

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Ronnie E. Williams, Sr. }
704 Birch Tree Lane }
Smyrna, DE 19977 }

Ransford Acquaye }
921 E 180th Street, #2E }
Bronx, NY 10460 }

Christopher Adams }
11350 Narrowleaf Drive }
Indianapolis, IN 46235 }

Harold Adams }
10042 S. Forest }
Chicago, IL 60628 }

Roland Anderson }
113 Lloyd Street }
Wilmington, DE 19803 }

Andre Andrews }
6478 Woodcrest Avenue }
Philadelphia, PA 19151 }

Lachaun Armstead }
950 Carnegie Street, Unit 1421 }
Henderson, NV 89052 }

Sherryl Aubry }
27740 Via De La Real }
Moreno Valley, CA 92555 }

Jonalida Aubry }
16250 Homecoming Drive, #1417 }
Chino, CA 91708 }

Sharon Avington-Key }
PO Box 2915 }
Richmond, CA 94902 }

Thomas Ayers }
1600 Leeds Chapel Road }

CASE NO. 21-1122

Greensboro, NC 27405 }
 }
 Christina Bailey }
 14 Courtwood Drive }
 Pikesville, DE 21208 }
 }
 Elonrah Barbour }
 5363 Hayes Street, N.E. }
 Washington, D.C. 20019 }
 }
 Gwen Baringer }
 7442 Prince George Road }
 Pikesville, MD 21208 }
 }
 Elaine Barnett }
 210 Stoney Brook Way, Apt. 108 }
 Fultondale, AL 35068 }
 }
 Ulysses Barton }
 1283 Grenada St. }
 Vallejo, CA 94591 }
 }
 Jimmie Batts }
 25228 Corte Oranada }
 Murrieta, CA 92563 }
 }
 Patricia Baylor }
 820 Gallatin Street NW }
 Washington, DC 20011 }
 }
 Sean Bickerton }
 DP0581-801 Butler Pike }
 Mercer, PA 16137 }
 }
 Talfourd Berry }
 4807 Pistachio Lane }
 Capitol Heights, MD 20743 }
 }
 Roger Boston }
 3410 Manis Road }
 Clinton, MD 20735 }
 }
 Greg Bowen }
 6510 Midra Drive }
 Lanham, MD 20706 }
 }

Phillip Boykin }
2911 27th Street }
Meridian, MS 39305 }
}
Alphonso Braddy }
15 Day Street }
Pawtucket, RI 02860 }
}
Odell Bradley }
161 Hazerhurst Avenue }
Lawrenceville, N.J. 08648 }
}
Avis Bracey }
15516 Chicacoan Drive }
Woodbridge, VA 22191 }
}
Roy Brown }
605 Etna Drive }
Upper Marlboro, MD 20774 }
}
Earl Brown }
9501 Piscataway Road }
Clinton, MD 20735 }
}
Marcus Brunswick }
1112 Windom Drive }
Wilmington, DE 19803 }
}
Carl Bunn }
5632 Bowcraft Street }
Los Angeles, CA 90016 }
}
Aundria Burcy }
{Address to be provided} }
}
Harold Burke }
1215 W. 8th Street }
Wilmington, DE 19806 }
}
Ralph Burnley }
7649 Front Street }
Cheltenham, PA 19012 }
}
Willie Butler }
821 Portsmouth Avenue }
Westchester, IL 60154 }

1879 NW 68th Terrace }
Miami, FL 33147 }
 }
Tamia Coleman }
1424 West 225th Street, Apt. 2 }
Torrance, CA 90501 }
 }
Kirk Collins }
3511 Byron Place }
Augusta, GA 30906 }
 }
Janice Comeaux }
23535 Palomino Drive # 258 }
Diamond Bar, CA 91765 }
 }
Catrina Cooley-Flagg }
27 C Slayton Way }
Roxbury, MA 02119 }
 }
Shirley Connell }
2156 West 51st Avenue }
Gary, IN 46408 }
 }
Charlese Cosby }
1617 East Mayland Street }
Philadelphia, PA 19138-1121 }
 }
Samuel Cox }
3802 Cedar Drive }
Suitland, MD 20747 }
 }
Henry Crawford }
4 Louis D. Brown Way }
Dorchester, MA 02124 }
 }
Doris Crenshaw, Personal Representative }
of the Estate of Roosevelt Crenshaw }
1419 North Priscilla Avenue }
Indianapolis, IN 46219 }
 }
Calvin Crisp }
560 Prospect Street, #117 }
Pawtucket, RI 02860 }
 }
Alvin Cunningham }
10413 Parapet Court }

Fort Washington, MD 20744	}
	}
Yvette Cunningham	}
PO Box 56292	}
Los Angeles, CA 90056	}
	}
Davy Dauchan	}
301 Joan Vista	}
El Sobrante, CA 94803	}
	}
James E. Davis	}
6017 Willow Oaks Drive, Apt. C	}
Richmond, VA 23225	}
	}
Thomas L. Dawkins	}
#8 Riverwood Circle	}
Greenville, SC 29617-1549	}
	}
Frederick Day	}
4517 South Prairie Avenue, Apt. 2-S	}
Chicago, IL 60653	}
	}
Keith Dean	}
469 Dogwood Park	}
Forest, IL 60466	}
	}
Anna Desper	}
76 Twin Hill Drive	}
Willingboro, NJ 08046	}
	}
Yvonne Dixon	}
15 Swan Sea Lane	}
Newark, DE 19702	}
	}
Towanna Dossett	}
3731 South Wilton Place	}
Los Angeles, CA 90018	}
	}
Everett Dubois	}
5320 Channing Road	}
Indianapolis, IN 46226	}
	}
Julius Dubois	}
4303 Josephine Avenue	}
Bettersville, MD 20705	}
	}

Sinclair Duboise, Estate of }
{*Personal Representative* }
{*name and address to be provided*} }
} }
Ralph Dunbar }
3420 S. Ravello Drive }
St. Augustine, FL 32092 }
} }
Lawrence Dye }
PO Box 122 }
Hamlet, NC 28345 }
} }
Gertrude Ellison }
71 Medford Lane }
Willingboro, NJ 08046 }
} }
William Ellison }
71 Medford Lane }
Willingboro, NJ 08046 }
} }
James Epps, Jr. }
2116 Albany }
Beach Grove, IN 46107 }
} }
Charles Evans }
12901 Clarion Road }
Ft. Washington, MD 20744 }
} }
Loretta Evans }
3823 Woodlawn Court }
Alexandria, VA 22304 }
} }
Connie Everett }
7833 Harshawa Drive }
Indianapolis, IN 46239 }
} }
George Everett }
7833 Harshawa Drive }
Indianapolis, IN 46239 }
} }
Paul Fields }
{*Address to be provided*} }
} }
Devern Fleming, Jr. }
464 Michigan Boulevard }
Pasadena, California 91107 }

Michael Green }
5916 N. 19th Street }
Philadelphia, PA 19141 }
}
Stephanie Green }
{Address to be provided} }
}
Reginald Grigsby }
1436 West Farwell Avenue,Unit 3-C }
Chicago, IL 60626 }
}
Beverly Hall }
27711 Fairmont Drive }
Moreno Valley, CA 92555 }
}
Lauren Ashley Hall }
27711 Fairmont Drive }
Moreno Valley, CA 92555 }
}
Carolyn Hamilton }
P.O. Box 38885 }
Philadelphia, PA 19104 }
}
Leslee Hamilton }
{Address to be provided} }
}
Jacklyn Handy }
PO Box 1176 }
Umatilla FL 32784 }
}
David Hardimon }
4780 Rosewood Cove }
Southaven, MS 38672 }
}
Otis Hargrove }
211 Hargrove Drive }
Rose Hill, NC 28458 }
}
Joel Harper }
{Address to be provided} }
}
Steven Harris }
204 Fenwick Avenue }
Wilmington, DE 19804 }
}
Reginald Hawkins }

{Address to be provided} }
 }
 }
 Betty Haymer }
 1406 South 11th Avenue }
 Maywood, IL 60153 }
 }
 }
 Betty Haymer }
 573 Ash Street }
 Brockton, MA 02301 }
 }
 }
 Janice Hence }
 250 Davis Avenue }
 Williamstown, NJ 08094 }
 }
 }
 Carl Hendricks }
 2111 Bodenger Boulevard }
 New Orleans, LA 70114 }
 }
 }
 Susan Henriques-Payne }
 1232 Fourth Street SW }
 Washington, DC 20024-2302 }
 }
 }
 DeWayne Hill }
 212 Spry Island Road }
 Joppa, MD 21085 }
 }
 }
 Ryan Hill }
 3443 Broad Street, Apt. D }
 Hamilton, NJ 08610 }
 }
 }
 Kevin Holbert }
{Address to be provided} }
 }
 }
 Billy Hollis }
 509 N. Fillmore Avenue }
 Rialto, CA 92376 }
 }
 }
 }
 Johnny Holmes }
 6342 Robinsrock Drive }
 Indianapolis, IN 46268 }
 }
 }
 }
 Christopher Holloman }
 7112 Branchwood Drive }
 Clinton, MD 20735 }
 }
 }
 }
 Dorothy Holman }

{Address to be provided} }
 }
Arlene Hood }
2555 Hampton Road, #3209 }
Henderson, NV 89052 }
 }
Shawn Horton }
8551 S. Bishop }
Chicago, IL 60620 }
 }
Lawrence Howard }
{Address to be provided} }
 }
Betty Howard }
1000 New Gate Road, Apt. 201 }
Peachtree City, GA 30269 }
 }
Lewis Howard }
8140 South Racine, Apt 310 }
Chicago, IL 60620 }
 }
James Hudson }
981 Gentle Flow Street }
Henderson, NV 89052 }
 }
Marcia Hutchinson }
1919 Sunset Village Drive }
Charlotte, NC 28216 }
 }
Akanke Isoke }
8110 MacArthur Boulevard, Apt. #1 }
Oakland, CA 94605 }
 }
James Ivey }
3520 Edenborn Avenue, Apt. 213 B }
Metairie, LA 70002 }
 }
Anthony Jace }
3130 Stocker Street }
Los Angeles, CA 90008 }
 }
Donna Jackson }
10028 Monterrey Road Apt B }
Indianapolis, IN 46235 }
 }
Leroy Jackson }

2010 Northwest 185th Terrace }
Opalocka, FL 33056 }
 }
David Jefferson }
4238 6th Avenue }
Los Angeles, CA 90008 }
 }
Judy Jefferson }
{Address to be provided} }
 }
Aaron Jenkins }
2001 North Rochester Avenue }
Indianapolis, IN 46222 }
 }
Joel Jenkins }
2807 South Dietz Street }
Indianapolis, IN 46203 }
 }
Wendy Rowlett Jennings }
4611 Hardscrabble Road 245 }
Columbia, SC 29229 }
 }
Frank Johnson }
22 Jackson Circle }
Trenton, TN 38382 }
 }
James Johnson }
1014 Wood Branch Court }
Upper Marlboro, MD 20774 }
 }
Lena Faye Johnson }
5640 Naylor Ct. }
Dale City, VA 22193 }
 }
Robert Johnson }
3143 Cluster Pine Drive }
Indianapolis, IN 46235 }
 }
Helen Johnson-Gardiner }
8224 Michener Avenue }
Philadelphia, PA 19150 }
 }
Alfred Jones }
1154 Route 9, PO Box 276 }
Columbiaville, NY 12050 }
 }

Diane Jones	}
4211 Illinois Avenue, NW	}
Washington, DC 20011	}
	}
Douglas Jones	}
256 East Dominguez Street	}
Carson, CA 90745	}
	}
Henry Jones	}
6507 Coffman Road	}
Indianapolis, IN 46268	}
	}
Joseph Jones	}
9903 Iroquois Lane	}
Bakersville, CA 93312	}
	}
Patricia Jones	}
<i>{Address to be provided}</i>	}
	}
Anthony Jordan	}
4702 Mary Beth Boulevard	}
Clinton, MD 20735	}
	}
Rubin Keys	}
1806 North Merrimac Street	}
Chicago, IL 60639	}
	}
Linda Kirkwood	}
233 Cambridge Street	}
Long Beach, CA 90805	}
	}
Cheryl Kyler	}
534 West 152nd Street, #62	}
New York, NY 10031	}
	}
Alvia Lacy	}
1306 Jervis Square	}
Belcamp. MD 21017	}
	}
Jacquelyn Landry	}
<i>{Address to be provided}</i>	}
	}
John Laners	}
7414 Avalon Trail Road	}
Indianapolis, IN 46250	}
	}

Christopher Larkett }
35988 Woodridge Circle }
Bldg. 36, Apt. 304 }
Farmington Hills, MI 48335 }
}
Donna Lock }
{Address to be provided} }
}
Arthur Logan }
2104 Harwood Road }
District Heights, MD 20747 }
}
Joseph Lorick }
4033 Briarhill Drive }
Charlotte, NC 28215 }
}
Cato Lewis }
{Address to be provided} }
}
Sylvia Lyons }
12197 Tuscola Street }
Marino Valley, CA 92257 }
}
Juanita Macomson, }
aka Thelma Macomson }
2438 Frances Street, Unit 6 }
Oakland, CA 94601 }
}
Winston MacIntosh }
{Address to be provided} }
}
Darrell Macon }
2929 Ponce de Leon Way South }
St. Petersburg, FL 33712 }
}
Jacqueline Renee Martin }
2901 Barton Avenue, Apt. B }
Richmond, VA 23222 }
}
Vergia Mason }
PO Box 538 }
Hodge, LA 71247 }
}
Angela Mathews }
629 NW 170 Terrace }
Pembroke Pines, FL 33028 }

Jacksonville, FL 32207	}
	}
Timothy Murphy, Estate of	}
6519 Elmhearst Street	}
District Heights, MD 20747	}
	}
Donald Murray	}
2701 Box Tree Drive	}
Upper Marlboro, MD 20774	}
	}
Michael Neal	}
1000 Broward Road, Apt 1505	}
Jacksonville, FL 33218	}
	}
James Overton	}
327 157th Street	}
Calumet City, IL 60409	}
	}
William Parker	}
9025 NW 12th Court	}
Miami, FL 33147	}
	}
Robert Parris	}
2915 Cruger Avenue	}
Bronx, NY 10467	}
	}
Joseph Peden	}
1424 South Cloverdale Avenue	}
Los Angeles, CA 90019	}
	}
James Peoples	}
11149 Millington Court	}
Jacksonville, FL 32246	}
	}
Frances Person	}
<i>{Address to be provided}</i>	}
	}
Gilbert Pete	}
3469 Margarita Avenue	}
Oakland, CA 94605	}
	}
Roy Phillips	}
5118 Valdez Road	}
Memphis, TN 38109	}
	}
Keith Pinder	}

{Address to be provided} }
 }
Emory Pinkney }
9350 NW Littler River Boulevard }
Miami, FL 33147 }
 }
Daphne Pinkey-Clark }
4913 Dockweiler }
Los Angeles, 90019 }
 }
Gloria Plummer }
{Address to be provided} }
 }
Howard Plummer }
{Address to be provided} }
 }
Jeffrey Plummer }
1225 East Johnson Street }
Philadelphia, PA 19138 }
 }
Janet Ponder }
1929 West 43rd St }
Los Angeles, CA 90062 }
 }
Roslyn Poston, *aka* Roslyn Lavera Jenkins }
9703 Summit Circle #2C }
Largo, MD 20774 }
 }
Jesse Timothy Potter }
14 Hovey Terrace }
Lynn, MA 01902-0859 }
 }
Joseph Presha }
2809 Peyton Crossing Drive, SW }
Atlanta, GA 30311 }
 }
Larry Prince }
6706 Della St }
Houston, TX; 77093 }
 }
Lynette Purcell }
451 NE 88th Street }
El Portal, FL 33138 }
 }
Edward Purnell }
2871 North Highland Place }

Indianapolis, IN 46208	}
	}
Bonita Quinn	}
28751 Olympia Way	}
Sun City, CA 92586-3130	}
	}
Dottie Reed	}
<i>{Address to be provided}</i>	}
	}
Faye Reed, by Sharon Denise Allmond	}
(holding power of attorney)	}
16509 Landmark Drive	}
Fontana, CA 92336	}
	}
Robert Redd	}
3332 N. Gerrard	}
Indianapolis, IN 46224	}
	}
Kurt Rent	}
5317 Radnor Road	}
Indianapolis, IN 46226	}
	}
Derek Reuben	}
5649 Bowcroft Street	}
Los Angeles, CA 90016	}
	}
Carmalita Rhymes-Drane	}
<i>{Address to be provided}</i>	}
	}
Brian Richards	}
118 Presidential Drive	}
Sicklerville, NJ 08081	}
	}
Tim Richardson	}
4635 N. Lesley Avenue	}
Indianapolis, IN 46226	}
	}
Louis Ricks III	}
P.O. Box 43	}
Suitland, MD 20752-0043	}
	}
LaSonya Rivers	}
5143 Westford Road	}
Philadelphia, PA 19120	}
	}
Frederic Roane	}

1361 Michigan NE }
Washington, DC 20017 }
 }
Sharon Montgomery Robinson, }
aka Sharon Hicks, }
aka Sharon Montgomery-Hicks }
6608 Saginaw Drive }
Rex, GA 30273 }
 }
Roy Rodriguez }
1648 Harvey Avenue }
Berwyn, Illinois 60402 }
 }
Romona Ross }
805 Bradley Street }
Fort Pierce, FL 34982 }
 }
Howard Rowley }
{*Address to be provided*} }
 }
Moses Rothchild }
3223 2nd Street }
New Orleans, LA 70125 }
 }
Shelly Samuels }
3019 W 13 Mile Rd Apt. 319 }
Royal Oak, MI 48073 }
 }
Rashell Sanders }
{*Address to be provided*} }
 }
Cynthia Sargent }
945 Keystone Avenue, Apt. 302 }
Indianapolis, IN 46206 }
 }
John Scott }
5203 Daventry Terrace }
District Heights, MD 20747 }
 }
Shanetta Scott }
4321 Telsair Boulevard, Apt. D-219 }
Camp Springs, MD 20746 }
 }
Tavio Scott }
2625 Lanecrest Drive, Unit 1 }
Charlotte, NC 28215 }

Leonard Seamon	}
3915 36th Ave N	}
Robinsdale MN 54422	}
	}
Lillie King Shepard	}
P.O. Box 3446	}
Ontario, CA 91761	}
	}
Elaine Simmonds	}
<i>{Address to be provided}</i>	}
	}
Jeanne Simmons	}
28051 Winthrop Court	}
Sun City, CA 92586	}
	}
Rudy Singeltary	}
2 Kingbird Road, Apt. 206	}
Dorchester, MA 02124	}
	}
Mathew Skidmore, Jr.	}
<i>{Address to be provided}</i>	}
	}
Kimberly Diane Slaughter	}
13629 Behrens Avenue	}
Norwalk, CA 90650	}
	}
Deborah Smallwood	}
<i>{Address to be provided}</i>	}
	}
Louis Smith	}
<i>{Address to be provided}</i>	}
	}
Janet Smith-Cook	}
109 Somerset Drive	}
Willingsboro, NJ 08046	}
	}
Darrell Soloman	}
<i>{Address to be provided}</i>	}
	}
Linda Stafford	}
P.O. Box 501491	}
Indianapolis, IN 46250	}
	}
James Standifer	}
<i>{Address to be provided}</i>	}

Cheryl Tyler
{
{Address to be provided}

Kathy Virdure
{
85 Pike Street, Apt. #55
{
Seattle, WA 98101
{

Eileen Vyhuis
{
1805 Primrose Rd, NW
{
Washington, DC 20012
{

Everett Wair, Sr.
{
44644 11th Street East
{
Lancaster, CA 93535
{

Valerie Walker
{
8526 Providence Street
{
Philadelphia, PA 19150
{

Frederick Wall
{
2207 Pewter Drive
{
Knoxville, TN 37909-1086
{

Lee Flora Wayne
{
2933 Stevenson Road
{
Brooksville, MS 39739
{

William Waytes
{
10 U Winslow Drive
{
Taunton, MA 02780
{

Angela Weaver
{
P.O. Box 4482
{
Riverside, CA 92514
{

Patricia Wellington
{
4306 Miller Road, Apt. 102
{
Wilmington, DE 19802
{

Garolyn Wells
{
2530 South 63rd Street
{
Philadelphia, PA 19142
{

Ronald Wells
{
215 Second Street
{

Elizabeth, NJ 07206 }
 }
Jimmy Lee Whitley }
5303 Old Lake Jeanette Road }
Greensboro, NC 27455 }
 }
Evelyn Whitlow }
4314 Edmondson Avenue }
Indianapolis, IN 46226 }
 }
Carolyn Williams }
1231 Sutler Terrace }
Oxon Hill, MD 20745 }
 }
Frank Williams }
5840 Highway 92 }
Fairburn, GA 30213 }
 }
Johnny Williams, Jr. }
{Address to be provided} }
 }
Leticia Williams }
4737 Hailey Circle }
Riverside, CA 92509 }
 }
Portia Williams }
7741 South Morgan Street, Apt. 2 }
Chicago, IL 60620 }
 }
Rene Williams }
3459 Morrison Avenue }
Oakland, CA 94602 }
 }
Robert Williams }
2628 N. Stuart Street }
Indianapolis, IN 46218 }
 }
Terrence Williams }
4475 Jurupa Avenue, Apt. H }
Riverside, CA 92506 }
 }
Theresa Williams }
5535 Ridgewood Street }
Philadelphia, PA 19143 }
 }
Garner Willis, Jr. }

5 Atwood Avenue, Apt. 3	}
Norwood, MA 02062	}
	}
Eric Woodruff	}
PO Box 2100-45	}
Brooklyn, NY 11221	}
	}
Curtis Yates	}
9548 Kimberly Lynn Circle	}
Glen Allen, VA 23060	}
	}
and	}
	}
Geary Young	}
<i>{Address to be provided}</i>	}
	}
PLAINTIFFS,	}
v.	}
	}
National Railroad Passenger Corporation,	}
400 North Capitol Street, N.W.	}
Washington, D.C. 20001	}
	}
DEFENDANT.	}
_____	}

COMPLAINT

I. NATURE OF THIS ACTION

1. The Plaintiffs bring this action against the National Railway Passenger Corporation, *aka* Amtrak, to redress race discrimination in employment. Specifically, the named Plaintiffs, all of whom are present or former employees of Amtrak or applicants for employment with Amtrak, bring this action against Amtrak pursuant to the Civil Rights Act of 1866, 42 U.S.C. § 1981.
2. The named Plaintiffs are seeking declaratory and injunctive relief, back pay, front pay, compensatory and punitive damages, and attorneys’ fees, costs, and expenses to redress Amtrak’s racially discriminatory employment policies, practices, procedures, and employment-related decisions.

II. JURISDICTION, VENUE, AND RELATED CASES

3. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343(4), 2201, 2202, and 42 U.S.C. § 1981.
4. Venue is proper in the District of Columbia because Amtrak resides here, maintains its corporate headquarters here, maintains its personnel records here, determines and implements here its company-wide policies, practices and procedures which have affected the named Plaintiffs, engages in and/or ratifies here illegal conduct which has adversely affected the named Plaintiffs, and engages in corporate activities, such as the implementation of discriminatory employment policies, practices, procedures, and decisions which are conceived and carried out here.
5. This case is related to two cases pending in this Court. The first, *Campbell, et al. v. National Railroad Passenger Corporation*, 1:99-cv-02979-EGS, has been pending since 1998. *Campbell* contained class action allegations regarding race discrimination in employment in violation of Title VII of the Civil Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.*, and the Civil Rights Act of 1866, 42 U.S.C. § 1981. Class certification in *Campbell* was denied by the Court on April 26, 2018. The second related case is a single-plaintiff case, *Bethea v. Amtrak Police Department*, 1:01CV01513 (EGS), which has been a companion case to *Campbell* for two decades.
6. The Plaintiffs' claims arising under 42 U.S.C. § 1981 do not require administrative exhaustion.

III. PARTIES

7. The Plaintiffs are all African-American citizens of the United States and were either employed, or applied to be hired for employment, at Amtrak during the former class liability period alleged in *Campbell, et al. v. National Railroad Passenger Corporation*, 1:99-cv-02979-EGS (hereinafter, "*Campbell*").

8. Defendant National Railroad Passenger Corporation, *aka* Amtrak (hereinafter “Amtrak”) is a corporation incorporated under the laws of, and with its principal place of business in, the District of Columbia. It provides passenger rail service to more than five hundred (500) stations in forty-four (44) states. From its corporate office in the District of Columbia, located at 400 North Capitol Street, N.W., Amtrak maintains actual and/or constructive control, oversight, and/or direction over all of its operations at all of its various locations, including the employment policies, practices and procedures to be utilized and adhered to at all of its locations. The acts set forth in this Complaint were authorized, ordered and/or done by Amtrak’s officers, agents, employees, and/ or representatives while actively engaged in the management of Amtrak’s business.

IV. THE PLAINTIFFS’ CLAIMS

9. During such employment, Plaintiff Ronnie Williams, Sr. was represented by a labor union for purposes of collective bargaining with Amtrak.
10. Plaintiff Ronnie Williams, Sr. experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
11. Plaintiff Ronnie Williams, Sr. was subjected to racial harassment and a racially hostile work environment during Plaintiff’s employment at Amtrak.
12. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ronnie Williams, Sr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

13. Plaintiff Ransford Acquaye is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
14. During such employment, Plaintiff Ransford Acquaye was represented by a labor union for purposes of collective bargaining with Amtrak.
15. Plaintiff Ransford Acquaye experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
16. Plaintiff Ransford Acquaye was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
17. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ransford Acquaye has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
18. Plaintiff Christopher Adams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
19. During such employment, Plaintiff Christopher Adams was represented by a labor union for purposes of collective bargaining with Amtrak.

20. Plaintiff Christopher Adams experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
21. Plaintiff Christopher Adams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
22. By reason of such racial discrimination in employment by Amtrak, Plaintiff Christopher Adams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
23. Plaintiff Harold Adams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
24. During such employment, Plaintiff Harold Adams was represented by a labor union for purposes of collective bargaining with Amtrak.
25. Plaintiff Harold Adams experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
26. Plaintiff Harold Adams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

27. By reason of such racial discrimination in employment by Amtrak, Plaintiff Harold Adams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
28. Plaintiff Roland Anderson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
29. During such employment, Plaintiff Roland Anderson was represented by a labor union for purposes of collective bargaining with Amtrak.
30. Plaintiff Roland Anderson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
31. Plaintiff Roland Anderson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
32. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roland Anderson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
33. Plaintiff Andre Andrews is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

34. During such employment, Plaintiff Andre Andrews was represented by a labor union for purposes of collective bargaining with Amtrak.
35. Plaintiff Andre Andrews experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
36. Plaintiff Andre Andrews was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
37. By reason of such racial discrimination in employment by Amtrak, Plaintiff Andre Andrews has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
38. Plaintiff Lachaun Armstead is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
39. During such employment, Plaintiff Lachaun Armstead was represented by a labor union for purposes of collective bargaining with Amtrak.
40. Plaintiff Lachaun Armstead experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

41. Plaintiff Lachaun Armstead was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
42. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lachaun Armstead has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
43. Plaintiff Sherryl Aubry is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
44. During such employment, Plaintiff Sherryl Aubry was represented by a labor union for purposes of collective bargaining with Amtrak.
45. Plaintiff Sherryl Aubry experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
46. Plaintiff Sherryl Aubry was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
47. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sherryl Aubry has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

48. Plaintiff Jonalida Aubry is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
49. During such employment, Plaintiff Jonalida Aubry was represented by a labor union for purposes of collective bargaining with Amtrak.
50. Plaintiff Jonalida Aubry experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
51. Plaintiff Jonalida Aubry was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
52. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jonalida Aubry has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
53. Plaintiff Sharon Avington-Key is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
54. During such employment, Plaintiff Sharon Avington-Key was represented by a labor union for purposes of collective bargaining with Amtrak.
55. Plaintiff Sharon Avington-Key experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

56. Plaintiff Sharon Avington-Key was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

57. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sharon Avington-Key has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

58. Plaintiff Thomas Ayers is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

59. During such employment, Plaintiff Thomas Ayers was represented by a labor union for purposes of collective bargaining with Amtrak.

60. Plaintiff Thomas Ayers experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

61. Plaintiff Thomas Ayers was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

62. By reason of such racial discrimination in employment by Amtrak, Plaintiff Thomas Ayers has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited

to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

63. Plaintiff Christina Bailey is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

64. During such employment, Plaintiff Christina Bailey was represented by a labor union for purposes of collective bargaining with Amtrak.

65. Plaintiff Christina Bailey experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

66. Plaintiff Christina Bailey was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

67. By reason of such racial discrimination in employment by Amtrak, Plaintiff Christina Bailey has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

68. Plaintiff Elonrah Barbour is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

69. During such employment, Plaintiff Elonrah Barbour was represented by a labor union for purposes of collective bargaining with Amtrak.

70. Plaintiff Elonrah Barbour experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
71. Plaintiff Elonrah Barbour was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
72. By reason of such racial discrimination in employment by Amtrak, Plaintiff Elonrah Barbour has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
73. Plaintiff Gwen Baringer is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
74. During such employment, Plaintiff Gwen Baringer was represented by a labor union for purposes of collective bargaining with Amtrak.
75. Plaintiff Gwen Baringer experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
76. Plaintiff Gwen Baringer was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

77. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gwen Baringer has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
78. Plaintiff Elaine Barnett is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
79. During such employment, Plaintiff Elaine Barnett was represented by a labor union for purposes of collective bargaining with Amtrak.
80. Plaintiff Elaine Barnett experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
81. Plaintiff Elaine Barnett was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
82. By reason of such racial discrimination in employment by Amtrak, Plaintiff Elaine Barnett has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
83. Plaintiff Ulysses Barton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

84. During such employment, Plaintiff Ulysses Barton was represented by a labor union for purposes of collective bargaining with Amtrak.
85. Plaintiff Ulysses Barton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
86. Plaintiff Ulysses Barton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
87. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ulysses Barton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
88. Plaintiff Jimmie Batts is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
89. During such employment, Plaintiff Jimmie Batts was represented by a labor union for purposes of collective bargaining with Amtrak.
90. Plaintiff Jimmie Batts experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

91. Plaintiff Jimmie Batts was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
92. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jimmie Batts has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
93. Plaintiff Patricia Baylor is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
94. During such employment, Plaintiff Patricia Baylor was represented by a labor union for purposes of collective bargaining with Amtrak.
95. Plaintiff Patricia Baylor experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
96. Plaintiff Patricia Baylor was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
97. By reason of such racial discrimination in employment by Amtrak, Plaintiff Patricia Baylor has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

98. Plaintiff Sean Bickerton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
99. During such employment, Plaintiff Sean Bickerton was represented by a labor union for purposes of collective bargaining with Amtrak.
100. Plaintiff Sean Bickerton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
101. Plaintiff Sean Bickerton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
102. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sean Bickerton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
103. Plaintiff Talfourd Berry is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
104. During such employment, Plaintiff Talfourd Berry was represented by a labor union for purposes of collective bargaining with Amtrak.
105. Plaintiff Talfourd Berry experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

106. Plaintiff Talfourd Berry was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

107. By reason of such racial discrimination in employment by Amtrak, Plaintiff Talfourd Berry has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

108. Plaintiff Roger Boston is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

109. During such employment, Plaintiff Roger Boston was represented by a labor union for purposes of collective bargaining with Amtrak.

110. Plaintiff Roger Boston experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

111. Plaintiff Roger Boston was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

112. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roger Boston has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

113. Plaintiff Greg Bowen is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

114. During such employment, Plaintiff Greg Bowen was represented by a labor union for purposes of collective bargaining with Amtrak.

115. Plaintiff Greg Bowen experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

116. Plaintiff Greg Bowen was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

117. By reason of such racial discrimination in employment by Amtrak, Plaintiff Greg Bowen has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

118. Plaintiff Phillip Boykin is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

119. During such employment, Plaintiff Phillip Boykin was represented by a labor union for purposes of collective bargaining with Amtrak.

120. Plaintiff Phillip Boykin experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
121. Plaintiff Phillip Boykin was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
122. By reason of such racial discrimination in employment by Amtrak, Plaintiff Phillip Boykin has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
123. Plaintiff Alphonso Braddy is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
124. During such employment, Plaintiff Alphonso Braddy was represented by a labor union for purposes of collective bargaining with Amtrak.
125. Plaintiff Alphonso Braddy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
126. Plaintiff Alphonso Braddy was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

127. By reason of such racial discrimination in employment by Amtrak, Plaintiff Alphonso Braddy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
128. Plaintiff Odell Bradley is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
129. During such employment, Plaintiff Odell Bradley was represented by a labor union for purposes of collective bargaining with Amtrak.
130. Plaintiff Odell Bradley experienced intentional racial discrimination by Amtrak in regard to some or all of the following: some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
131. Plaintiff Odell Bradley was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
132. By reason of such racial discrimination in employment by Amtrak, Plaintiff Odell Bradley has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
133. Plaintiff Avis Bracey is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

134. During such employment, Plaintiff Avis Bracey was represented by a labor union for purposes of collective bargaining with Amtrak.
135. Plaintiff Avis Bracey experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
136. Plaintiff Avis Bracey was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
137. By reason of such racial discrimination in employment by Amtrak, Plaintiff Avis Bracey has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
138. Plaintiff Roy Brown is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
139. During such employment, Plaintiff Roy Brown was represented by a labor union for purposes of collective bargaining with Amtrak.
140. Plaintiff Roy Brown experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

141. Plaintiff Roy Brown was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
142. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roy Brown has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
143. Plaintiff Earl Brown is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
144. During such employment, Plaintiff Earl Brown was represented by a labor union for purposes of collective bargaining with Amtrak.
145. Plaintiff Earl Brown experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
146. Plaintiff Earl Brown was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
147. By reason of such racial discrimination in employment by Amtrak, Plaintiff Earl Brown has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

148. Plaintiff Marcus Brunswick is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

149. During such employment, Plaintiff Marcus Brunswick was represented by a labor union for purposes of collective bargaining with Amtrak.

150. Plaintiff Marcus Brunswick experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

151. Plaintiff Marcus Brunswick was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

152. By reason of such racial discrimination in employment by Amtrak, Plaintiff Marcus Brunswick has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

153. Plaintiff Carl Bunn is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

154. During such employment, Plaintiff Carl Bunn was represented by a labor union for purposes of collective bargaining with Amtrak.

155. Plaintiff Carl Bunn experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

156. Plaintiff Carl Bunn was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
157. By reason of such racial discrimination in employment by Amtrak, Plaintiff Carl Bunn has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
158. Plaintiff Aundria Burcy is an African-American citizen of the United States and applied for employment at Amtrak during the former class liability period alleged in *Campbell*.
159. The position or positions for which Plaintiff Aundria Burcy applied were represented by a labor union for purposes of collective bargaining with Amtrak.
160. Plaintiff Aundria Burcy experienced intentional racial discrimination by Amtrak in the denial of her application or applications and refusal to hire her and/or with regard testing and/or denial of testing opportunities.
161. By reason of such racial discrimination in employment by Amtrak, Plaintiff Aundria Burcy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
162. Plaintiff Harold Burke is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

163. During such employment, Plaintiff Harold Burke was represented by a labor union for purposes of collective bargaining with Amtrak.
164. Plaintiff Harold Burke experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
165. Plaintiff Harold Burke was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
166. By reason of such racial discrimination in employment by Amtrak, Plaintiff Harold Burke has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
167. Plaintiff Ralph Burnley is an African-American citizen of the United States and applied for employment at Amtrak during the former class liability period alleged in *Campbell*.
168. The position or positions for which Plaintiff Ralph Burnley applied were represented by a labor union for purposes of collective bargaining with Amtrak.
169. Plaintiff Ralph Burnley experienced intentional racial discrimination by Amtrak in the denial of her application or applications and refusal to hire him and/or with regard testing and/or denial of testing opportunities.
170. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ralph Burnley has suffered the loss of compensation, wages, back pay and front pay, other employment

benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

171. Plaintiff Willie Butler is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

172. During such employment, Plaintiff Willie Butler was represented by a labor union for purposes of collective bargaining with Amtrak.

173. Plaintiff Willie Butler experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

174. Plaintiff Willie Butler was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

175. By reason of such racial discrimination in employment by Amtrak, Plaintiff Willie Butler has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

176. Plaintiff Beatrice Caffee-Earle is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

177. During such employment, Plaintiff Beatrice Caffee-Earle was represented by a labor union for purposes of collective bargaining with Amtrak.

178. Plaintiff Beatrice Caffee-Earle experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

179. Plaintiff Beatrice Caffee-Earle was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

180. By reason of such racial discrimination in employment by Amtrak, Plaintiff Beatrice Caffee-Earle has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

181. Plaintiff Michael Caldwell is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

182. During such employment, Plaintiff Michael Caldwell was represented by a labor union for purposes of collective bargaining with Amtrak.

183. Plaintiff Michael Caldwell experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

184. Plaintiff Michael Caldwell was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

185. By reason of such racial discrimination in employment by Amtrak, Plaintiff Michael Caldwell has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
186. Plaintiff Otis Canadiate is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
187. During such employment, Plaintiff Otis Canadiate was represented by a labor union for purposes of collective bargaining with Amtrak.
188. Plaintiff Otis Canadiate experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
189. Plaintiff Otis Canadiate was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
190. By reason of such racial discrimination in employment by Amtrak, Plaintiff Otis Canadiate has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
191. Plaintiff Thomas Carter is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

192. During such employment, Plaintiff Thomas Carter was represented by a labor union for purposes of collective bargaining with Amtrak.
193. Plaintiff Thomas Carter experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
194. Plaintiff Thomas Carter was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
195. By reason of such racial discrimination in employment by Amtrak, Plaintiff Thomas Carter has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
196. Plaintiff Vernon Carter is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
197. During such employment, Plaintiff Vernon Carter was represented by a labor union for purposes of collective bargaining with Amtrak.
198. Plaintiff Vernon Carter experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

199. Plaintiff Vernon Carter was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

200. By reason of such racial discrimination in employment by Amtrak, Plaintiff Vernon Carter has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

201. Plaintiff Priscilla Cathey is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

202. During such employment, Plaintiff Priscilla Cathey was represented by a labor union for purposes of collective bargaining with Amtrak.

203. Plaintiff Priscilla Cathey experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

204. Plaintiff Priscilla Cathey was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

205. By reason of such racial discrimination in employment by Amtrak, Plaintiff Priscilla Cathey has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

206. Plaintiff Kevin Chase is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
207. During such employment, Plaintiff Kevin Chase was represented by a labor union for purposes of collective bargaining with Amtrak.
208. Plaintiff Kevin Chase experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
209. Plaintiff Kevin Chase was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
210. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kevin Chase has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
211. Plaintiff Hardin Cheatham is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
212. During such employment, Plaintiff Hardin Cheatham was represented by a labor union for purposes of collective bargaining with Amtrak.
213. Plaintiff Hardin Cheatham experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

214. Plaintiff Hardin Cheatham was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

215. By reason of such racial discrimination in employment by Amtrak, Plaintiff Hardin Cheatham has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

216. Plaintiff Gary Christian is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

217. During such employment, Plaintiff Gary Christian was represented by a labor union for purposes of collective bargaining with Amtrak.

218. Plaintiff Gary Christian experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

219. Plaintiff Gary Christian was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

220. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gary Christian has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

221. Plaintiff Edward Clarke is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

222. During such employment, Plaintiff Edward Clarke was represented by a labor union for purposes of collective bargaining with Amtrak.

223. Plaintiff Edward Clarke experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

224. Plaintiff Edward Clarke was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

225. By reason of such racial discrimination in employment by Amtrak, Plaintiff Edward Clarke has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

226. Plaintiff Calvin Cole is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

227. During such employment, Plaintiff Calvin Cole was represented by a labor union for purposes of collective bargaining with Amtrak.

228. Plaintiff Calvin Cole experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
229. Plaintiff Calvin Cole was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
230. By reason of such racial discrimination in employment by Amtrak, Plaintiff Calvin Cole has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
231. Plaintiff Raymond Lee Coleman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
232. During such employment, Plaintiff Raymond Lee Coleman was represented by a labor union for purposes of collective bargaining with Amtrak.
233. Plaintiff Raymond Lee Coleman experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
234. Plaintiff Raymond Lee Coleman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

235. By reason of such racial discrimination in employment by Amtrak, Plaintiff Raymond Lee Coleman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
236. Plaintiff Tamia Coleman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
237. During such employment, Plaintiff Tamia Coleman was represented by a labor union for purposes of collective bargaining with Amtrak.
238. Plaintiff Tamia Coleman experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
239. Plaintiff Tamia Coleman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
240. By reason of such racial discrimination in employment by Amtrak, Plaintiff Tamia Coleman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
241. Plaintiff Kirk Collins is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

242. During such employment, Plaintiff Kirk Collins was represented by a labor union for purposes of collective bargaining with Amtrak.
243. Plaintiff Kirk Collins experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
244. Plaintiff Kirk Collins was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
245. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kirk Collins has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
246. Plaintiff Janice Comeaux is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
247. During such employment, Plaintiff Janice Comeaux was represented by a labor union for purposes of collective bargaining with Amtrak.
248. Plaintiff Janice Comeaux experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

249. Plaintiff Janice Comeaux was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

250. By reason of such racial discrimination in employment by Amtrak, Plaintiff Janice Comeaux has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

251. Plaintiff Catrina Cooley-Flagg is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

252. During such employment, Plaintiff Catrina Cooley-Flagg was represented by a labor union for purposes of collective bargaining with Amtrak.

253. Plaintiff Catrina Cooley-Flagg experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

254. Plaintiff Catrina Cooley-Flagg was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

255. By reason of such racial discrimination in employment by Amtrak, Plaintiff Catrina Cooley-Flagg has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

256. Plaintiff Shirley Connell is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
257. During such employment, Plaintiff Shirley Connell was represented by a labor union for purposes of collective bargaining with Amtrak.
258. Plaintiff Shirley Connell experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
259. Plaintiff Shirley Connell was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
260. By reason of such racial discrimination in employment by Amtrak, Plaintiff Shirley Connell has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
261. Plaintiff Charlese Cosby is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
262. During such employment, Plaintiff Charlese Cosby was represented by a labor union for purposes of collective bargaining with Amtrak.
263. Plaintiff Charlese Cosby experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

264. Plaintiff Charlese Cosby was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

265. By reason of such racial discrimination in employment by Amtrak, Plaintiff Charlese Cosby has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

266. Plaintiff Samuel Cox is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

267. During such employment, Plaintiff Samuel Cox was represented by a labor union for purposes of collective bargaining with Amtrak.

268. Plaintiff Samuel Cox experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

269. Plaintiff Samuel Cox was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

270. By reason of such racial discrimination in employment by Amtrak, Plaintiff Samuel Cox has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

271. Plaintiff Henry Crawford is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

272. During such employment, Plaintiff Henry Crawford was represented by a labor union for purposes of collective bargaining with Amtrak.

273. Plaintiff Henry Crawford experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

274. Plaintiff Henry Crawford was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

275. By reason of such racial discrimination in employment by Amtrak, Plaintiff Henry Crawford has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

276. Plaintiff Doris Crenshaw is the Personal Representative of the Estate of Roosevelt Crenshaw and herein asserts employment discrimination claims of Roosevelt Crenshaw, deceased, against Amtrak. Roosevelt Crenshaw was an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

277. During such employment, Roosevelt Crenshaw was represented by a labor union for purposes of collective bargaining with Amtrak.
278. Roosevelt Crenshaw experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
279. Roosevelt Crenshaw was subjected to racial harassment and a racially hostile work environment during his employment at Amtrak.
280. By reason of such racial discrimination in employment by Amtrak, Roosevelt Crenshaw suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
281. Plaintiff Calvin Crisp is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
282. During such employment, Plaintiff Calvin Crisp was represented by a labor union for purposes of collective bargaining with Amtrak.
283. Plaintiff Calvin Crisp experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

284. Plaintiff Calvin Crisp was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
285. By reason of such racial discrimination in employment by Amtrak, Plaintiff Calvin Crisp has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
286. Plaintiff Alvin Cunningham is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
287. During such employment, Plaintiff Alvin Cunningham was represented by a labor union for purposes of collective bargaining with Amtrak.
288. Plaintiff Alvin Cunningham experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
289. Plaintiff Alvin Cunningham was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
290. By reason of such racial discrimination in employment by Amtrak, Plaintiff Alvin Cunningham has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

291. Plaintiff Yvette Cunningham is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

292. During such employment, Plaintiff Yvette Cunningham was represented by a labor union for purposes of collective bargaining with Amtrak.

293. Plaintiff Yvette Cunningham experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

294. Plaintiff Yvette Cunningham was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

295. By reason of such racial discrimination in employment by Amtrak, Plaintiff Yvette Cunningham has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

296. Plaintiff Davy Dauchan is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

297. During such employment, Plaintiff Davy Dauchan was represented by a labor union for purposes of collective bargaining with Amtrak.

298. Plaintiff Davy Dauchan experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

299. Plaintiff Davy Dauchan was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

300. By reason of such racial discrimination in employment by Amtrak, Plaintiff Davy Dauchan has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

301. Plaintiff James E. Davis is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

302. During such employment, Plaintiff James E. Davis was represented by a labor union for purposes of collective bargaining with Amtrak.

303. Plaintiff James E. Davis experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

304. Plaintiff James E. Davis was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

305. By reason of such racial discrimination in employment by Amtrak, Plaintiff James E. Davis has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

306. Plaintiff Thomas L. Dawkins is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

307. During such employment, Plaintiff Thomas L. Dawkins was represented by a labor union for purposes of collective bargaining with Amtrak.

308. Plaintiff Thomas L. Dawkins experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

309. Plaintiff Thomas L. Dawkins was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

310. By reason of such racial discrimination in employment by Amtrak, Plaintiff Thomas L. Dawkins has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

311. Plaintiff Frederick Day is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

312. During such employment, Plaintiff Frederick Day was represented by a labor union for purposes of collective bargaining with Amtrak.

313. Plaintiff Frederick Day experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
314. Plaintiff Frederick Day was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
315. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frederick Day has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
316. Plaintiff Keith Dean is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
317. During such employment, Plaintiff Keith Dean was represented by a labor union for purposes of collective bargaining with Amtrak.
318. Plaintiff Keith Dean experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
319. Plaintiff Keith Dean was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

320. By reason of such racial discrimination in employment by Amtrak, Plaintiff Keith Dean has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

321. Plaintiff Anna Desper is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

322. During such employment, Plaintiff Anna Desper was represented by a labor union for purposes of collective bargaining with Amtrak.

323. Plaintiff Anna Desper experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

324. Plaintiff Anna Desper was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

325. By reason of such racial discrimination in employment by Amtrak, Plaintiff Anna Desper has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

326. Plaintiff Yvonne Dixon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

327. During such employment, Plaintiff Yvonne Dixon was represented by a labor union for purposes of collective bargaining with Amtrak.
328. Plaintiff Yvonne Dixon experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
329. Plaintiff Yvonne Dixon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
330. By reason of such racial discrimination in employment by Amtrak, Plaintiff Yvonne Dixon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
331. Plaintiff Towanna Dossett is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
332. During such employment, Plaintiff Towanna Dossett was represented by a labor union for purposes of collective bargaining with Amtrak.
333. Plaintiff Towanna Dossett experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

334. Plaintiff Towanna Dossett was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

335. By reason of such racial discrimination in employment by Amtrak, Plaintiff Towanna Dossett has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

336. Plaintiff Everett Dubois is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

337. During such employment, Plaintiff Everett Dubois was represented by a labor union for purposes of collective bargaining with Amtrak.

338. Plaintiff Everett Dubois experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

339. Plaintiff Everett Dubois was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

340. By reason of such racial discrimination in employment by Amtrak, Plaintiff Everett Dubois has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

341. Plaintiff Julius Dubois is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
342. During such employment, Plaintiff Julius Dubois was represented by a labor union for purposes of collective bargaining with Amtrak.
343. Plaintiff Julius Dubois experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
344. Plaintiff Julius Dubois was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
345. By reason of such racial discrimination in employment by Amtrak, Plaintiff Julius Dubois has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
346. Plaintiff Estate of Sinclair Duboise is the estate of Sinclair Duboise, deceased, who was an African-American citizen of the United States and herein asserts employment discrimination claims of Sinclair Duboise against Amtrak. Sinclair Duboise was employed at Amtrak during the former class liability period alleged in *Campbell*.
347. During such employment, Sinclair Duboise was represented by a labor union for purposes of collective bargaining with Amtrak.

348. Sinclair Duboise experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
349. Sinclair Duboise was subjected to racial harassment and a racially hostile work environment during his employment at Amtrak.
350. By reason of such racial discrimination in employment by Amtrak, Sinclair Duboise suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
351. Plaintiff Ralph Dunbar is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
352. During such employment, Plaintiff Ralph Dunbar was represented by a labor union for purposes of collective bargaining with Amtrak.
353. Plaintiff Ralph Dunbar experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
354. Plaintiff Ralph Dunbar was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

355. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ralph Dunbar has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

356. Plaintiff Lawrence Dye is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

357. During such employment, Plaintiff Lawrence Dye was represented by a labor union for purposes of collective bargaining with Amtrak.

358. Plaintiff Lawrence Dye experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

359. Plaintiff Lawrence Dye was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

360. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lawrence Dye has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

361. Plaintiff Gertrude Ellison is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

362. During such employment, Plaintiff Gertrude Ellison was represented by a labor union for purposes of collective bargaining with Amtrak.

363. Plaintiff Gertrude Ellison experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

364. Plaintiff Gertrude Ellison was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

365. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gertrude Ellison has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

366. Plaintiff William Ellison is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

367. During such employment, Plaintiff William Ellison was represented by a labor union for purposes of collective bargaining with Amtrak.

368. Plaintiff William Ellison experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

369. Plaintiff William Ellison was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

370. By reason of such racial discrimination in employment by Amtrak, Plaintiff William Ellison has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

371. Plaintiff James Epps, Jr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

372. During such employment, Plaintiff James Epps, Jr. was represented by a labor union for purposes of collective bargaining with Amtrak.

373. Plaintiff James Epps, Jr. experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

374. Plaintiff James Epps, Jr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

375. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Epps, Jr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

376. Plaintiff Charles Evans is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

377. During such employment, Plaintiff Charles Evans was represented by a labor union for purposes of collective bargaining with Amtrak.

378. Plaintiff Charles Evans experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

379. Plaintiff Charles Evans was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

380. By reason of such racial discrimination in employment by Amtrak, Plaintiff Charles Evans has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

381. Plaintiff Loretta Evans is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

382. During such employment, Plaintiff Loretta Evans was represented by a labor union for purposes of collective bargaining with Amtrak.

383. Plaintiff Loretta Evans experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

384. Plaintiff Loretta Evans was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

385. By reason of such racial discrimination in employment by Amtrak, Plaintiff Loretta Evans has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

386. Plaintiff Connie Everett is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

387. During such employment, Plaintiff Connie Everett was represented by a labor union for purposes of collective bargaining with Amtrak.

388. Plaintiff Connie Everett experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

389. Plaintiff Connie Everett was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

390. By reason of such racial discrimination in employment by Amtrak, Plaintiff Connie Everett has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

391. Plaintiff George Everett is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

392. During such employment, Plaintiff George Everett was represented by a labor union for purposes of collective bargaining with Amtrak.

393. Plaintiff George Everett experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

394. Plaintiff George Everett was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

395. By reason of such racial discrimination in employment by Amtrak, Plaintiff George Everett has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

396. Plaintiff Paul Fields is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

397. During such employment, Plaintiff Paul Fields was represented by a labor union for purposes of collective bargaining with Amtrak.

398. Plaintiff Paul Fields experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

399. Plaintiff Paul Fields was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

400. By reason of such racial discrimination in employment by Amtrak, Plaintiff Paul Fields has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

401. Plaintiff Devern Fleming, Jr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

402. During such employment, Plaintiff Devern Fleming, Jr. was represented by a labor union for purposes of collective bargaining with Amtrak.

403. Plaintiff Devern Fleming, Jr. experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

404. Plaintiff Devern Fleming, Jr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

405. By reason of such racial discrimination in employment by Amtrak, Plaintiff Devern Fleming, Jr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
406. Plaintiff Brandi Ford is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
407. During such employment, Plaintiff Brandi Ford was represented by a labor union for purposes of collective bargaining with Amtrak.
408. Plaintiff Brandi Ford experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
409. Plaintiff Brandi Ford was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
410. By reason of such racial discrimination in employment by Amtrak, Plaintiff Brandi Ford has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
411. Plaintiff Riley Freeman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

412. During such employment, Plaintiff Riley Freeman was represented by a labor union for purposes of collective bargaining with Amtrak.
413. Plaintiff Riley Freeman experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
414. Plaintiff Riley Freeman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
415. By reason of such racial discrimination in employment by Amtrak, Plaintiff Riley Freeman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
416. Plaintiff Owen Funderburke III is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
417. During such employment, Plaintiff Owen Funderburke III was represented by a labor union for purposes of collective bargaining with Amtrak.
418. Plaintiff Owen Funderburke III experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

419. Plaintiff Owen Funderburke III was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

420. By reason of such racial discrimination in employment by Amtrak, Plaintiff Owen Funderburke III has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

421. Plaintiff Berwick Gabriel is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

422. During such employment, Plaintiff Berwick Gabriel was represented by a labor union for purposes of collective bargaining with Amtrak.

423. Plaintiff Berwick Gabriel experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

424. Plaintiff Berwick Gabriel was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

425. By reason of such racial discrimination in employment by Amtrak, Plaintiff Berwick Gabriel has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

426. Plaintiff Lynn Garland-Solomon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

427. During such employment, Plaintiff Lynn Garland-Solomon was represented by a labor union for purposes of collective bargaining with Amtrak.

428. Plaintiff Lynn Garland-Solomon experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

429. Plaintiff Lynn Garland-Solomon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

430. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lynn Garland-Solomon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

431. Plaintiff Gail H. George is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

432. During such employment, Plaintiff Gail H. George was represented by a labor union for purposes of collective bargaining with Amtrak.

433. Plaintiff Gail H. George experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

434. Plaintiff Gail H. George was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

435. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gail H. George has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

436. Plaintiff Reuben Gill is the Personal Representative of the Estate of James Gill and herein asserts employment discrimination claims of James Gill against Amtrak. James Gill was an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

437. During such employment, James Gill was represented by a labor union for purposes of collective bargaining with Amtrak.

438. James Gill experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

439. James Gill was subjected to racial harassment and a racially hostile work environment during his employment at Amtrak.

440. By reason of such racial discrimination in employment by Amtrak, James Gill suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

441. Plaintiff Olivia Gillis is the Personal Representative of the Estate of Kenneth Gillis and herein asserts employment discrimination claims of Kenneth Gillis against Amtrak. Kenneth Gillis was an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

442. During such employment, Kenneth Gillis was represented by a labor union for purposes of collective bargaining with Amtrak.

443. Kenneth Gillis experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

444. Kenneth Gillis was subjected to racial harassment and a racially hostile work environment during his employment at Amtrak.

445. By reason of such racial discrimination in employment by Amtrak, Kenneth Gillis suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

446. Plaintiff Lamar Grant is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

447. During such employment, Plaintiff Lamar Grant was represented by a labor union for purposes of collective bargaining with Amtrak.

448. Plaintiff Lamar Grant experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

449. Plaintiff Lamar Grant was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

450. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lamar Grant has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

451. Plaintiff Beverly Green is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

452. During such employment, Plaintiff Beverly Green was represented by a labor union for purposes of collective bargaining with Amtrak.

453. Plaintiff Beverly Green experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

454. Plaintiff Beverly Green was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

455. By reason of such racial discrimination in employment by Amtrak, Plaintiff Beverly Green has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

456. Plaintiff Clifton Green is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

457. During such employment, Plaintiff Clifton Green was represented by a labor union for purposes of collective bargaining with Amtrak.

458. Plaintiff Clifton Green experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

459. Plaintiff Clifton Green was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

460. By reason of such racial discrimination in employment by Amtrak, Plaintiff Clifton Green has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

461. Plaintiff Michael Green is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

462. During such employment, Plaintiff Michael Green was represented by a labor union for purposes of collective bargaining with Amtrak.

463. Plaintiff Michael Green experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

464. Plaintiff Michael Green was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

465. By reason of such racial discrimination in employment by Amtrak, Plaintiff Michael Green has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

466. Plaintiff Stephanie Green is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

467. During such employment, Plaintiff Stephanie Green was represented by a labor union for purposes of collective bargaining with Amtrak.

468. Plaintiff Stephanie Green experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
469. Plaintiff Stephanie Green was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
470. By reason of such racial discrimination in employment by Amtrak, Plaintiff Stephanie Green has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
471. Plaintiff Reginald Grigsby is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
472. During such employment, Plaintiff Reginald Grigsby was represented by a labor union for purposes of collective bargaining with Amtrak.
473. Plaintiff Reginald Grigsby experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
474. Plaintiff Reginald Grigsby was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

475. By reason of such racial discrimination in employment by Amtrak, Plaintiff Reginald Grigsby has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

476. Plaintiff Beverly Hall is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

477. During such employment, Plaintiff Beverly Hall was represented by a labor union for purposes of collective bargaining with Amtrak.

478. Plaintiff Beverly Hall experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

479. Plaintiff Beverly Hall was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

480. By reason of such racial discrimination in employment by Amtrak, Plaintiff Beverly Hall has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

481. Plaintiff Lauren Ashley Hall is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

482. During such employment, Plaintiff Lauren Ashley Hall was represented by a labor union for purposes of collective bargaining with Amtrak.

483. Plaintiff Lauren Ashley Hall experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

484. Plaintiff Lauren Ashley Hall was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

485. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lauren Ashley Hall has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

486. Plaintiff Carolyn Hamilton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

487. During such employment, Plaintiff Carolyn Hamilton was represented by a labor union for purposes of collective bargaining with Amtrak.

488. Plaintiff Carolyn Hamilton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

489. Plaintiff Carolyn Hamilton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

490. By reason of such racial discrimination in employment by Amtrak, Plaintiff Carolyn Hamilton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

491. Plaintiff Leslee Hamilton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

492. During such employment, Plaintiff Leslee Hamilton was represented by a labor union for purposes of collective bargaining with Amtrak.

493. Plaintiff Leslee Hamilton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

494. Plaintiff Leslee Hamilton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

495. By reason of such racial discrimination in employment by Amtrak, Plaintiff Leslee Hamilton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

496. Plaintiff Jacklyn Handy is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

497. During such employment, Plaintiff Jacklyn Handy was represented by a labor union for purposes of collective bargaining with Amtrak.

498. Plaintiff Jacklyn Handy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

499. Plaintiff Jacklyn Handy was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

500. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jacklyn Handy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

501. Plaintiff David Hardimon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

502. During such employment, Plaintiff David Hardimon was represented by a labor union for purposes of collective bargaining with Amtrak.

503. Plaintiff David Hardimon experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

504. Plaintiff David Hardimon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

505. By reason of such racial discrimination in employment by Amtrak, Plaintiff David Hardimon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

506. Plaintiff Otis Hargrove is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

507. During such employment, Plaintiff Otis Hargrove was represented by a labor union for purposes of collective bargaining with Amtrak.

508. Plaintiff Otis Hargrove experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

509. Plaintiff Otis Hargrove was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

510. By reason of such racial discrimination in employment by Amtrak, Plaintiff Otis Hargrove has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

511. Plaintiff Joel Harper is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

512. During such employment, Plaintiff Joel Harper was represented by a labor union for purposes of collective bargaining with Amtrak.

513. Plaintiff Joel Harper experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

514. Plaintiff Joel Harper was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

515. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joel Harper has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

516. Plaintiff Steven Harris is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

517. During such employment, Plaintiff Steven Harris was represented by a labor union for purposes of collective bargaining with Amtrak.

518. Plaintiff Steven Harris experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
519. Plaintiff Steven Harris was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
520. By reason of such racial discrimination in employment by Amtrak, Plaintiff Steven Harris has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
521. Plaintiff Reginald Hawkins is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
522. During such employment, Plaintiff Reginald Hawkins was represented by a labor union for purposes of collective bargaining with Amtrak.
523. Plaintiff Reginald Hawkins experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
524. Plaintiff Reginald Hawkins was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

525. By reason of such racial discrimination in employment by Amtrak, Plaintiff Reginald Hawkins has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
526. Plaintiff Betty Haymer of Maywood, IL, is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
527. During such employment, Plaintiff Betty Haymer of Maywood, IL, was represented by a labor union for purposes of collective bargaining with Amtrak.
528. Plaintiff Betty Haymer of Maywood, IL, experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
529. Plaintiff Betty Haymer of Maywood, IL, was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
530. By reason of such racial discrimination in employment by Amtrak, Plaintiff Betty Haymer of Maywood, IL, has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
531. Plaintiff Betty Haymer of Brockton, MA, is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

532. During such employment, Plaintiff Betty Haymer of Brockton, MA, was represented by a labor union for purposes of collective bargaining with Amtrak.

533. Plaintiff Betty Haymer of Brockton, MA, experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

534. Plaintiff Betty Haymer of Brockton, MA, was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

535. By reason of such racial discrimination in employment by Amtrak, Plaintiff Betty Haymer of Brockton, MA, has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

536. Plaintiff Janice Hence is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

537. During such employment, Plaintiff Janice Hence was represented by a labor union for purposes of collective bargaining with Amtrak.

538. Plaintiff Janice Hence experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

539. Plaintiff Janice Hence was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

540. By reason of such racial discrimination in employment by Amtrak, Plaintiff Janice Hence has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

541. Plaintiff Carl Hendricks is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

542. During such employment, Plaintiff Carl Hendricks was represented by a labor union for purposes of collective bargaining with Amtrak.

543. Plaintiff Carl Hendricks experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

544. Plaintiff Carl Hendricks was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

545. By reason of such racial discrimination in employment by Amtrak, Plaintiff Carl Hendricks has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

546. Plaintiff Susan Henriques-Payne is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

547. During such employment, Plaintiff Susan Henriques-Payne was represented by a labor union for purposes of collective bargaining with Amtrak.

548. Plaintiff Susan Henriques-Payne experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

549. Plaintiff Susan Henriques-Payne was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

550. By reason of such racial discrimination in employment by Amtrak, Plaintiff Susan Henriques-Payne has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

551. Plaintiff DeWayne Hill is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

552. During such employment, Plaintiff DeWayne Hill was represented by a labor union for purposes of collective bargaining with Amtrak.

553. Plaintiff DeWayne Hill experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

554. Plaintiff DeWayne Hill was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

555. By reason of such racial discrimination in employment by Amtrak, Plaintiff DeWayne Hill has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

556. Plaintiff Ryan Hill is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

557. During such employment, Plaintiff Ryan Hill was represented by a labor union for purposes of collective bargaining with Amtrak.

558. Plaintiff Ryan Hill experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

559. Plaintiff Ryan Hill was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

560. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ryan Hill has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

561. Plaintiff Kevin Holbert is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

562. During such employment, Plaintiff Kevin Holbert was represented by a labor union for purposes of collective bargaining with Amtrak.

563. Plaintiff Kevin Holbert experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

564. Plaintiff Kevin Holbert was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

565. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kevin Holbert has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

566. Plaintiff Billy Hollis is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

567. During such employment, Plaintiff Billy Hollis was represented by a labor union for purposes of collective bargaining with Amtrak.

568. Plaintiff Billy Hollis experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

569. Plaintiff Billy Hollis was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

570. By reason of such racial discrimination in employment by Amtrak, Plaintiff Billy Hollis has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

571. Plaintiff Johnny Holmes is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

572. During such employment, Plaintiff Johnny Holmes was represented by a labor union for purposes of collective bargaining with Amtrak.

573. Plaintiff Johnny Holmes experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

574. Plaintiff Johnny Holmes was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

575. By reason of such racial discrimination in employment by Amtrak, Plaintiff Johnny Holmes has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

576. Plaintiff Christopher Holloman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

577. During such employment, Plaintiff Christopher Holloman was represented by a labor union for purposes of collective bargaining with Amtrak.

578. Plaintiff Christopher Holloman experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

579. Plaintiff Christopher Holloman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

580. By reason of such racial discrimination in employment by Amtrak, Plaintiff Christopher Holloman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

581. Plaintiff Dorothy Holman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

582. During such employment, Plaintiff Dorothy Holman was represented by a labor union for purposes of collective bargaining with Amtrak.

583. Plaintiff Dorothy Holman experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

584. Plaintiff Dorothy Holman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

585. By reason of such racial discrimination in employment by Amtrak, Plaintiff Dorothy Holman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

586. Plaintiff Arlene Hood is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

587. During such employment, Plaintiff Arlene Hood was represented by a labor union for purposes of collective bargaining with Amtrak.

588. Plaintiff Arlene Hood experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

589. Plaintiff Arlene Hood was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

590. By reason of such racial discrimination in employment by Amtrak, Plaintiff Arlene Hood has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

591. Plaintiff Shawn Horton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

592. During such employment, Plaintiff Shawn Horton was represented by a labor union for purposes of collective bargaining with Amtrak.

593. Plaintiff Shawn Horton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

594. Plaintiff Shawn Horton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

595. By reason of such racial discrimination in employment by Amtrak, Plaintiff Shawn Horton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

596. Plaintiff Lawrence Howard is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

597. During such employment, Plaintiff Lawrence Howard was represented by a labor union for purposes of collective bargaining with Amtrak.

598. Plaintiff Lawrence Howard experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

599. Plaintiff Lawrence Howard was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

600. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lawrence Howard has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

601. Plaintiff Betty Howard is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

602. During such employment, Plaintiff Betty Howard was represented by a labor union for purposes of collective bargaining with Amtrak.

603. Plaintiff Betty Howard experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

604. Plaintiff Betty Howard was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

605. By reason of such racial discrimination in employment by Amtrak, Plaintiff Betty Howard has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

606. Plaintiff Lewis Howard is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

607. During such employment, Plaintiff Lewis Howard was represented by a labor union for purposes of collective bargaining with Amtrak.

608. Plaintiff Lewis Howard experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

609. Plaintiff Lewis Howard was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

610. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lewis Howard has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

611. Plaintiff James Hudson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
612. During such employment, Plaintiff James Hudson was represented by a labor union for purposes of collective bargaining with Amtrak.
613. Plaintiff James Hudson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
614. Plaintiff James Hudson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
615. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Hudson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
616. Plaintiff Marcia Hutchinson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
617. During such employment, Plaintiff Marcia Hutchinson was represented by a labor union for purposes of collective bargaining with Amtrak.

618. Plaintiff Marcia Hutchinson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

619. Plaintiff Marcia Hutchinson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

620. By reason of such racial discrimination in employment by Amtrak, Plaintiff Marcia Hutchinson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

621. Plaintiff Akanke Isoke is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

622. During such employment, Plaintiff Akanke Isoke was represented by a labor union for purposes of collective bargaining with Amtrak.

623. Plaintiff Akanke Isoke experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

624. Plaintiff Akanke Isoke was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

625. By reason of such racial discrimination in employment by Amtrak, Plaintiff Akanke Isoke has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

626. Plaintiff James Ivey is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

627. During such employment, Plaintiff James Ivey was represented by a labor union for purposes of collective bargaining with Amtrak.

628. Plaintiff James Ivey experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

629. Plaintiff James Ivey was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

630. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Ivey has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

631. Plaintiff Anthony Jace is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

632. During such employment, Plaintiff Anthony Jace was represented by a labor union for purposes of collective bargaining with Amtrak.

633. Plaintiff Anthony Jace experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

634. Plaintiff Anthony Jace was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

635. By reason of such racial discrimination in employment by Amtrak, Plaintiff Anthony Jace has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

636. Plaintiff Donna Jackson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

637. During such employment, Plaintiff Donna Jackson was represented by a labor union for purposes of collective bargaining with Amtrak.

638. Plaintiff Donna Jackson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

639. Plaintiff Donna Jackson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

640. By reason of such racial discrimination in employment by Amtrak, Plaintiff Donna Jackson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

641. Plaintiff Leroy Jackson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

642. During such employment, Plaintiff Leroy Jackson was represented by a labor union for purposes of collective bargaining with Amtrak.

643. Plaintiff Leroy Jackson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

644. Plaintiff Leroy Jackson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

645. By reason of such racial discrimination in employment by Amtrak, Plaintiff Leroy Jackson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

646. Plaintiff David Jefferson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

647. During such employment, Plaintiff David Jefferson was represented by a labor union for purposes of collective bargaining with Amtrak.

648. Plaintiff David Jefferson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

649. Plaintiff David Jefferson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

650. By reason of such racial discrimination in employment by Amtrak, Plaintiff David Jefferson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

651. Plaintiff Judy Jefferson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

652. During such employment, Plaintiff Judy Jefferson was represented by a labor union for purposes of collective bargaining with Amtrak.

653. Plaintiff Judy Jefferson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

654. Plaintiff Judy Jefferson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

655. By reason of such racial discrimination in employment by Amtrak, Plaintiff Judy Jefferson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

656. Plaintiff Aaron Jenkins is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

657. During such employment, Plaintiff Aaron Jenkins was represented by a labor union for purposes of collective bargaining with Amtrak.

658. Plaintiff Aaron Jenkins experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

659. Plaintiff Aaron Jenkins was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

660. By reason of such racial discrimination in employment by Amtrak, Plaintiff Aaron Jenkins has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

661. Plaintiff Joel Jenkins is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

662. During such employment, Plaintiff Joel Jenkins was represented by a labor union for purposes of collective bargaining with Amtrak.

663. Plaintiff Joel Jenkins experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

664. Plaintiff Joel Jenkins was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

665. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joel Jenkins has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

666. Plaintiff Wendy Rowlett Jennings is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

667. During such employment, Plaintiff Wendy Rowlett Jennings was represented by a labor union for purposes of collective bargaining with Amtrak.

668. Plaintiff Wendy Rowlett Jennings experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

669. Plaintiff Wendy Rowlett Jennings was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

670. By reason of such racial discrimination in employment by Amtrak, Plaintiff Wendy Rowlett Jennings has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

671. Plaintiff Frank Johnson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

672. During such employment, Plaintiff Frank Johnson was represented by a labor union for purposes of collective bargaining with Amtrak.

673. Plaintiff Frank Johnson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

674. Plaintiff Frank Johnson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

675. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frank Johnson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

676. Plaintiff James Johnson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

677. During such employment, Plaintiff James Johnson was represented by a labor union for purposes of collective bargaining with Amtrak.

678. Plaintiff James Johnson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

679. Plaintiff James Johnson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

680. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Johnson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

681. Plaintiff Lena Faye Johnson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

682. During such employment, Plaintiff Lena Faye Johnson was represented by a labor union for purposes of collective bargaining with Amtrak.

683. Plaintiff Lena Faye Johnson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

684. Plaintiff Lena Faye Johnson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

685. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lena Faye Johnson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

686. Plaintiff Robert Johnson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

687. During such employment, Plaintiff Robert Johnson was represented by a labor union for purposes of collective bargaining with Amtrak.

688. Plaintiff Robert Johnson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

689. Plaintiff Robert Johnson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

690. By reason of such racial discrimination in employment by Amtrak, Plaintiff Robert Johnson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

691. Plaintiff Helen Johnson-Gardiner is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

692. During such employment, Plaintiff Helen Johnson-Gardiner was represented by a labor union for purposes of collective bargaining with Amtrak.

693. Plaintiff Helen Johnson-Gardiner experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

694. Plaintiff Helen Johnson-Gardiner was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

695. By reason of such racial discrimination in employment by Amtrak, Plaintiff Helen Johnson-Gardiner has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

696. Plaintiff Alfred Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

697. During such employment, Plaintiff Alfred Jones was represented by a labor union for purposes of collective bargaining with Amtrak.

698. Plaintiff Alfred Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

699. Plaintiff Alfred Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

700. By reason of such racial discrimination in employment by Amtrak, Plaintiff Alfred Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

701. Plaintiff Diane Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

702. During such employment, Plaintiff Diane Jones was represented by a labor union for purposes of collective bargaining with Amtrak.

703. Plaintiff Diane Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

704. Plaintiff Diane Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

705. By reason of such racial discrimination in employment by Amtrak, Plaintiff Diane Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

706. Plaintiff Douglas Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

707. During such employment, Plaintiff Douglas Jones was represented by a labor union for purposes of collective bargaining with Amtrak.

708. Plaintiff Douglas Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

709. Plaintiff Douglas Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

710. By reason of such racial discrimination in employment by Amtrak, Plaintiff Douglas Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

711. Plaintiff Henry Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

712. During such employment, Plaintiff Henry Jones was represented by a labor union for purposes of collective bargaining with Amtrak.

713. Plaintiff Henry Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

714. Plaintiff Henry Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

715. By reason of such racial discrimination in employment by Amtrak, Plaintiff Henry Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

716. Plaintiff Joseph Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

717. During such employment, Plaintiff Joseph Jones was represented by a labor union for purposes of collective bargaining with Amtrak.

718. Plaintiff Joseph Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
719. Plaintiff Joseph Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
720. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joseph Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
721. Plaintiff Patricia Jones is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
722. During such employment, Plaintiff Patricia Jones was represented by a labor union for purposes of collective bargaining with Amtrak.
723. Plaintiff Patricia Jones experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
724. Plaintiff Patricia Jones was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

725. By reason of such racial discrimination in employment by Amtrak, Plaintiff Patricia Jones has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

726. Plaintiff Anthony Jordan is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

727. During such employment, Plaintiff Anthony Jordan was represented by a labor union for purposes of collective bargaining with Amtrak.

728. Plaintiff Anthony Jordan experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

729. Plaintiff Anthony Jordan was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

730. By reason of such racial discrimination in employment by Amtrak, Plaintiff Anthony Jordan has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

731. Plaintiff Rubin Keys is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

732. During such employment, Plaintiff Rubin Keys was represented by a labor union for purposes of collective bargaining with Amtrak.
733. Plaintiff Rubin Keys experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
734. Plaintiff Rubin Keys was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
735. By reason of such racial discrimination in employment by Amtrak, Plaintiff Rubin Keys has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
736. Plaintiff Linda Kirkwood is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
737. During such employment, Plaintiff Linda Kirkwood was represented by a labor union for purposes of collective bargaining with Amtrak.
738. Plaintiff Linda Kirkwood experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

739. Plaintiff Linda Kirkwood was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

740. By reason of such racial discrimination in employment by Amtrak, Plaintiff Linda Kirkwood has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

741. Plaintiff Cheryl Kyler is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

742. During such employment, Plaintiff Cheryl Kyler was represented by a labor union for purposes of collective bargaining with Amtrak.

743. Plaintiff Cheryl Kyler experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

744. Plaintiff Cheryl Kyler was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

745. By reason of such racial discrimination in employment by Amtrak, Plaintiff Cheryl Kyler has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

746. Plaintiff Alvia Lacy is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

747. During such employment, Plaintiff Alvia Lacy was represented by a labor union for purposes of collective bargaining with Amtrak.

748. Plaintiff Alvia Lacy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

749. Plaintiff Alvia Lacy was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

750. By reason of such racial discrimination in employment by Amtrak, Plaintiff Alvia Lacy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

751. Plaintiff Jacquelyn Landry is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

752. During such employment, Plaintiff Jacquelyn Landry was represented by a labor union for purposes of collective bargaining with Amtrak.

753. Plaintiff Jacquelyn Landry experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

754. Plaintiff Jacquelyn Landry was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

755. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jacquelyn Landry has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

756. Plaintiff John Laners is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

757. During such employment, Plaintiff John Laners was represented by a labor union for purposes of collective bargaining with Amtrak.

758. Plaintiff John Laners experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

759. Plaintiff John Laners was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

760. By reason of such racial discrimination in employment by Amtrak, Plaintiff John Laners has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

761. Plaintiff Christopher Larkett is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

762. During such employment, Plaintiff Christopher Larkett was represented by a labor union for purposes of collective bargaining with Amtrak.

763. Plaintiff Christopher Larkett experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

764. Plaintiff Christopher Larkett was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

765. By reason of such racial discrimination in employment by Amtrak, Plaintiff Christopher Larkett has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

766. Plaintiff Donna Lock is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

767. During such employment, Plaintiff Donna Lock was represented by a labor union for purposes of collective bargaining with Amtrak.

768. Plaintiff Donna Lock experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
769. Plaintiff Donna Lock was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
770. By reason of such racial discrimination in employment by Amtrak, Plaintiff Donna Lock has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
771. Plaintiff Arthur Logan is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
772. During such employment, Plaintiff Arthur Logan was represented by a labor union for purposes of collective bargaining with Amtrak.
773. Plaintiff Arthur Logan experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
774. Plaintiff Arthur Logan was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

775. By reason of such racial discrimination in employment by Amtrak, Plaintiff Arthur Logan has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

776. Plaintiff Joseph Lorick is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

777. During such employment, Plaintiff Joseph Lorick was represented by a labor union for purposes of collective bargaining with Amtrak.

778. Plaintiff Joseph Lorick experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

779. Plaintiff Joseph Lorick was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

780. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joseph Lorick has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

781. Plaintiff Cato Lewis is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

782. During such employment, Plaintiff Cato Lewis was represented by a labor union for purposes of collective bargaining with Amtrak.
783. Plaintiff Cato Lewis experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
784. Plaintiff Cato Lewis was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
785. By reason of such racial discrimination in employment by Amtrak, Plaintiff Cato Lewis has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
786. Plaintiff Sylvia Lyons is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
787. During such employment, Plaintiff Sylvia Lyons was represented by a labor union for purposes of collective bargaining with Amtrak.
788. Plaintiff Sylvia Lyons experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

789. Plaintiff Sylvia Lyons was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

790. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sylvia Lyons has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

791. Plaintiff Juanita Macomson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

792. During such employment, Plaintiff Juanita Macomson was represented by a labor union for purposes of collective bargaining with Amtrak.

793. Plaintiff Juanita Macomson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

794. Plaintiff Juanita Macomson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

795. By reason of such racial discrimination in employment by Amtrak, Plaintiff Juanita Macomson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

796. Plaintiff Winston MacIntosh is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

797. During such employment, Plaintiff Winston MacIntosh was represented by a labor union for purposes of collective bargaining with Amtrak.

798. Plaintiff Winston MacIntosh experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

799. Plaintiff Winston MacIntosh was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

800. By reason of such racial discrimination in employment by Amtrak, Plaintiff Winston MacIntosh has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

801. Plaintiff Darrell Macon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

802. During such employment, Plaintiff Darrell Macon was represented by a labor union for purposes of collective bargaining with Amtrak.

803. Plaintiff Darrell Macon experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

804. Plaintiff Darrell Macon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

805. By reason of such racial discrimination in employment by Amtrak, Plaintiff Darrell Macon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

806. Plaintiff Jacqueline Renee Martin is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

807. During such employment, Plaintiff Jacqueline Renee Martin was represented by a labor union for purposes of collective bargaining with Amtrak.

808. Plaintiff Jacqueline Renee Martin experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

809. Plaintiff Jacqueline Renee Martin was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

810. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jacqueline Renee Martin has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

811. Plaintiff Vergia Mason is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

812. During such employment, Plaintiff Vergia Mason was represented by a labor union for purposes of collective bargaining with Amtrak.

813. Plaintiff Vergia Mason experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

814. Plaintiff Vergia Mason was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

815. By reason of such racial discrimination in employment by Amtrak, Plaintiff Vergia Mason has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

816. Plaintiff Angela Mathews is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

817. During such employment, Plaintiff Angela Mathews was represented by a labor union for purposes of collective bargaining with Amtrak.

818. Plaintiff Angela Mathews experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
819. Plaintiff Angela Mathews was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
820. By reason of such racial discrimination in employment by Amtrak, Plaintiff Angela Mathews has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
821. Plaintiff Moses McCoy is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
822. During such employment, Plaintiff Moses McCoy was represented by a labor union for purposes of collective bargaining with Amtrak.
823. Plaintiff Moses McCoy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
824. Plaintiff Moses McCoy was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

825. By reason of such racial discrimination in employment by Amtrak, Plaintiff Moses McCoy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

826. Plaintiff Robin McCoy is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

827. During such employment, Plaintiff Robin McCoy was represented by a labor union for purposes of collective bargaining with Amtrak.

828. Plaintiff Robin McCoy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

829. Plaintiff Robin McCoy was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

830. By reason of such racial discrimination in employment by Amtrak, Plaintiff Robin McCoy has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

831. Plaintiff Hilry McNealey is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

832. During such employment, Plaintiff Hilry McNealey was represented by a labor union for purposes of collective bargaining with Amtrak.

833. Plaintiff Hilry McNealey experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

834. Plaintiff Hilry McNealey was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

835. By reason of such racial discrimination in employment by Amtrak, Plaintiff Hilry McNealey has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

836. Plaintiff Sabrina McCrae is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

837. During such employment, Plaintiff Sabrina McCrae was represented by a labor union for purposes of collective bargaining with Amtrak.

838. Plaintiff Sabrina McCrae experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

839. Plaintiff Sabrina McCrae was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

840. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sabrina McCrae has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

841. Plaintiff Sheila McGowan is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

842. During such employment, Plaintiff Sheila McGowan was represented by a labor union for purposes of collective bargaining with Amtrak.

843. Plaintiff Sheila McGowan experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

844. Plaintiff Sheila McGowan was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

845. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sheila McGowan has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

846. Plaintiff DeQuincy McRae is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

847. During such employment, Plaintiff DeQuincy McRae was represented by a labor union for purposes of collective bargaining with Amtrak.

848. Plaintiff DeQuincy McRae experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

849. Plaintiff DeQuincy McRae was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

850. By reason of such racial discrimination in employment by Amtrak, Plaintiff DeQuincy McRae has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

851. Plaintiff Anthony Mellerson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

852. During such employment, Plaintiff Anthony Mellerson was represented by a labor union for purposes of collective bargaining with Amtrak.

853. Plaintiff Anthony Mellerson experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

854. Plaintiff Anthony Mellerson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

855. By reason of such racial discrimination in employment by Amtrak, Plaintiff Anthony Mellerson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

856. Plaintiff Pamela Michaux is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

857. During such employment, Plaintiff Pamela Michaux was represented by a labor union for purposes of collective bargaining with Amtrak.

858. Plaintiff Pamela Michaux experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

859. Plaintiff Pamela Michaux was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

860. By reason of such racial discrimination in employment by Amtrak, Plaintiff Pamela Michaux has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

861. Plaintiff Tyre Miles is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

862. During such employment, Plaintiff Tyre Miles was represented by a labor union for purposes of collective bargaining with Amtrak.

863. Plaintiff Tyre Miles experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

864. Plaintiff Tyre Miles was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

865. By reason of such racial discrimination in employment by Amtrak, Plaintiff Tyre Miles has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

866. Plaintiff Marlon Miller is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

867. During such employment, Plaintiff Marlon Miller was represented by a labor union for purposes of collective bargaining with Amtrak.

868. Plaintiff Marlon Miller experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

869. Plaintiff Marlon Miller was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

870. By reason of such racial discrimination in employment by Amtrak, Plaintiff Marlon Miller has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

871. Plaintiff Larry Moore is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

872. During such employment, Plaintiff Larry Moore was represented by a labor union for purposes of collective bargaining with Amtrak.

873. Plaintiff Larry Moore experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

874. Plaintiff Larry Moore was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

875. By reason of such racial discrimination in employment by Amtrak, Plaintiff Larry Moore has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

876. Plaintiff Beverly Morris is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

877. During such employment, Plaintiff Beverly Morris was represented by a labor union for purposes of collective bargaining with Amtrak.

878. Plaintiff Beverly Morris experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

879. Plaintiff Beverly Morris was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

880. By reason of such racial discrimination in employment by Amtrak, Plaintiff Beverly Morris has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

881. Plaintiff Livingston Mixon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

882. During such employment, Plaintiff Livingston Mixon was represented by a labor union for purposes of collective bargaining with Amtrak.

883. Plaintiff Livingston Mixon experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

884. Plaintiff Livingston Mixon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

885. By reason of such racial discrimination in employment by Amtrak, Plaintiff Livingston Mixon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

886. Plaintiff Estate of Timothy Murphy is the estate of Timothy Murphy, deceased, who was an African-American citizen of the United States and herein asserts employment discrimination claims of Timothy Murphy against Amtrak. Timothy Murphy was employed at Amtrak during the former class liability period alleged in *Campbell*.

887. During such employment, Timothy Murphy was represented by a labor union for purposes of collective bargaining with Amtrak.

888. Timothy Murphy experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

889. Timothy Murphy was subjected to racial harassment and a racially hostile work environment during his employment at Amtrak.

890. By reason of such racial discrimination in employment by Amtrak, Timothy Murphy suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

891. Plaintiff Donald Murray is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

892. During such employment, Plaintiff Donald Murray was represented by a labor union for purposes of collective bargaining with Amtrak.

893. Plaintiff Donald Murray experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

894. Plaintiff Donald Murray was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

895. By reason of such racial discrimination in employment by Amtrak, Plaintiff Donald Murray has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

896. Plaintiff Michael Neal is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

897. During such employment, Plaintiff Michael Neal was represented by a labor union for purposes of collective bargaining with Amtrak.

898. Plaintiff Michael Neal experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

899. Plaintiff Michael Neal was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

900. By reason of such racial discrimination in employment by Amtrak, Plaintiff Michael Neal has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

901. Plaintiff James Overton is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

902. During such employment, Plaintiff James Overton was represented by a labor union for purposes of collective bargaining with Amtrak.

903. Plaintiff James Overton experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

904. Plaintiff James Overton was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

905. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Overton has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

906. Plaintiff William Parker is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

907. During such employment, Plaintiff William Parker was represented by a labor union for purposes of collective bargaining with Amtrak.

908. Plaintiff William Parker experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

909. Plaintiff William Parker was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

910. By reason of such racial discrimination in employment by Amtrak, Plaintiff William Parker has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

911. Plaintiff Robert Parris is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

912. During such employment, Plaintiff Robert Parris was represented by a labor union for purposes of collective bargaining with Amtrak.

913. Plaintiff Robert Parris experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

914. Plaintiff Robert Parris was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

915. By reason of such racial discrimination in employment by Amtrak, Plaintiff Robert Parris has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

916. Plaintiff Joseph Peden is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

917. During such employment, Plaintiff Joseph Peden was represented by a labor union for purposes of collective bargaining with Amtrak.
918. Plaintiff Joseph Peden experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
919. Plaintiff Joseph Peden was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
920. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joseph Peden has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
921. Plaintiff James Peoples is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
922. During such employment, Plaintiff James Peoples was represented by a labor union for purposes of collective bargaining with Amtrak.
923. Plaintiff James Peoples experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

924. Plaintiff James Peoples was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

925. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Peoples has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

926. Plaintiff Frances Person is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

927. During such employment, Plaintiff Frances Person was represented by a labor union for purposes of collective bargaining with Amtrak.

928. Plaintiff Frances Person experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

929. Plaintiff Frances Person was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

930. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frances Person has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

931. Plaintiff Gilbert Pete is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
932. During such employment, Plaintiff Gilbert Pete was represented by a labor union for purposes of collective bargaining with Amtrak.
933. Plaintiff Gilbert Pete experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
934. Plaintiff Gilbert Pete was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
935. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gilbert Pete has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
936. Plaintiff Roy Phillips is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
937. During such employment, Plaintiff Roy Phillips was represented by a labor union for purposes of collective bargaining with Amtrak.
938. Plaintiff Roy Phillips experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

939. Plaintiff Roy Phillips was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

940. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roy Phillips has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

941. Plaintiff Keith Pinder is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

942. During such employment, Plaintiff Keith Pinder was represented by a labor union for purposes of collective bargaining with Amtrak.

943. Plaintiff Keith Pinder experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

944. Plaintiff Keith Pinder was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

945. By reason of such racial discrimination in employment by Amtrak, Plaintiff Keith Pinder has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

946. Plaintiff Emory Pinkney is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

947. During such employment, Plaintiff Emory Pinkney was represented by a labor union for purposes of collective bargaining with Amtrak.

948. Plaintiff Emory Pinkney experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

949. Plaintiff Emory Pinkney was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

950. By reason of such racial discrimination in employment by Amtrak, Plaintiff Emory Pinkney has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

951. Plaintiff Daphne Pinkey-Clark is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

952. During such employment, Plaintiff Daphne Pinkey-Clark was represented by a labor union for purposes of collective bargaining with Amtrak.

953. Plaintiff Daphne Pinkey-Clark experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
954. Plaintiff Daphne Pinkey-Clark was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
955. By reason of such racial discrimination in employment by Amtrak, Plaintiff Daphne Pinkey-Clark has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
956. Plaintiff Gloria Plummer is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
957. During such employment, Plaintiff Gloria Plummer was represented by a labor union for purposes of collective bargaining with Amtrak.
958. Plaintiff Gloria Plummer experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
959. Plaintiff Gloria Plummer was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

960. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gloria Plummer has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
961. Plaintiff Howard Plummer is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
962. During such employment, Plaintiff Howard Plummer was represented by a labor union for purposes of collective bargaining with Amtrak.
963. Plaintiff Howard Plummer experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
964. Plaintiff Howard Plummer was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
965. By reason of such racial discrimination in employment by Amtrak, Plaintiff Howard Plummer has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
966. Plaintiff Jeffrey Plummer is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

967. During such employment, Plaintiff Jeffrey Plummer was represented by a labor union for purposes of collective bargaining with Amtrak.

968. Plaintiff Jeffrey Plummer experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

969. Plaintiff Jeffrey Plummer was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

970. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jeffrey Plummer has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

971. Plaintiff Janet Ponder is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

972. During such employment, Plaintiff Janet Ponder was represented by a labor union for purposes of collective bargaining with Amtrak.

973. Plaintiff Janet Ponder experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

974. Plaintiff Janet Ponder was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
975. By reason of such racial discrimination in employment by Amtrak, Plaintiff Janet Ponder has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
976. Plaintiff Roslyn Poston is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
977. During such employment, Plaintiff Roslyn Poston was represented by a labor union for purposes of collective bargaining with Amtrak.
978. Plaintiff Roslyn Poston experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
979. Plaintiff Roslyn Poston was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
980. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roslyn Poston has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

981. Plaintiff Jesse Timothy Potter is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

982. During such employment, Plaintiff Jesse Timothy Potter was represented by a labor union for purposes of collective bargaining with Amtrak.

983. Plaintiff Jesse Timothy Potter experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

984. Plaintiff Jesse Timothy Potter was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

985. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jesse Timothy Potter has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

986. Plaintiff Joseph Presha is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

987. During such employment, Plaintiff Joseph Presha was represented by a labor union for purposes of collective bargaining with Amtrak.

988. Plaintiff Joseph Presha experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work

assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

989. Plaintiff Joseph Presha was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

990. By reason of such racial discrimination in employment by Amtrak, Plaintiff Joseph Presha has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

991. Plaintiff Larry Prince is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

992. During such employment, Plaintiff Larry Prince was represented by a labor union for purposes of collective bargaining with Amtrak.

993. Plaintiff Larry Prince experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

994. Plaintiff Larry Prince was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

995. By reason of such racial discrimination in employment by Amtrak, Plaintiff Larry Prince has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

996. Plaintiff Lynette Purcell is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

997. During such employment, Plaintiff Lynette Purcell was represented by a labor union for purposes of collective bargaining with Amtrak.

998. Plaintiff Lynette Purcell experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

999. Plaintiff Lynette Purcell was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1000. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lynette Purcell has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1001. Plaintiff Edward Purnell is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1002. During such employment, Plaintiff Edward Purnell was represented by a labor union for purposes of collective bargaining with Amtrak.

1003. Plaintiff Edward Purnell experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1004. Plaintiff Edward Purnell was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1005. By reason of such racial discrimination in employment by Amtrak, Plaintiff Edward Purnell has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1006. Plaintiff Bonita Quinn is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1007. During such employment, Plaintiff Bonita Quinn was represented by a labor union for purposes of collective bargaining with Amtrak.
1008. Plaintiff Bonita Quinn experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1009. Plaintiff Bonita Quinn was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1010. By reason of such racial discrimination in employment by Amtrak, Plaintiff Bonita Quinn has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1011. Plaintiff Dottie Reed is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1012. During such employment, Plaintiff Dottie Reed was represented by a labor union for purposes of collective bargaining with Amtrak.

1013. Plaintiff Dottie Reed experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1014. Plaintiff Dottie Reed was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1015. By reason of such racial discrimination in employment by Amtrak, Plaintiff Dottie Reed has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1016. Plaintiff Faye Reed is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1017. Power of attorney over the affairs of Plaintiff Faye Reed is held and, in this case, exercised by Sharon Denise Allmond.
1018. During such employment, Plaintiff Faye Reed was represented by a labor union for purposes of collective bargaining with Amtrak.
1019. Plaintiff Faye Reed experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1020. Plaintiff Faye Reed was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1021. By reason of such racial discrimination in employment by Amtrak, Plaintiff Faye Reed has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1022. Plaintiff Robert Redd is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1023. During such employment, Plaintiff Robert Redd was represented by a labor union for purposes of collective bargaining with Amtrak.
1024. Plaintiff Robert Redd experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours

and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1025. Plaintiff Robert Redd was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1026. By reason of such racial discrimination in employment by Amtrak, Plaintiff Robert Redd has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1027. Plaintiff Kurt Rent is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1028. During such employment, Plaintiff Kurt Rent was represented by a labor union for purposes of collective bargaining with Amtrak.

1029. Plaintiff Kurt Rent experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1030. Plaintiff Kurt Rent was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1031. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kurt Rent has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1032. Plaintiff Derek Reuben is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1033. During such employment, Plaintiff Derek Reuben was represented by a labor union for purposes of collective bargaining with Amtrak.

1034. Plaintiff Derek Reuben experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1035. Plaintiff Derek Reuben was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1036. By reason of such racial discrimination in employment by Amtrak, Plaintiff Derek Reuben has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1037. Plaintiff Carmalita Rhymes-Drane is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1038. During such employment, Plaintiff Carmalita Rhymes-Drane was represented by a labor union for purposes of collective bargaining with Amtrak.

1039. Plaintiff Carmalita Rhymes-Drane experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1040. Plaintiff Carmalita Rhymes-Drane was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1041. By reason of such racial discrimination in employment by Amtrak, Plaintiff Carmalita Rhymes-Drane has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1042. Plaintiff Brian Richards is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1043. During such employment, Plaintiff Brian Richards was represented by a labor union for purposes of collective bargaining with Amtrak.
1044. Plaintiff Brian Richards experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1045. Plaintiff Brian Richards was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1046. By reason of such racial discrimination in employment by Amtrak, Plaintiff Brian Richards has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1047. Plaintiff Tim Richardson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1048. During such employment, Plaintiff Tim Richardson was represented by a labor union for purposes of collective bargaining with Amtrak.
1049. Plaintiff Tim Richardson experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1050. Plaintiff Tim Richardson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1051. By reason of such racial discrimination in employment by Amtrak, Plaintiff Tim Richardson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1052. Plaintiff Louis Ricks III is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1053. During such employment, Plaintiff Louis Ricks III was represented by a labor union for purposes of collective bargaining with Amtrak.

1054. Plaintiff Louis Ricks III experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1055. Plaintiff Louis Ricks III was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1056. By reason of such racial discrimination in employment by Amtrak, Plaintiff Louis Ricks III has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1057. Plaintiff LaSonya Rivers is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1058. During such employment, Plaintiff LaSonya Rivers was represented by a labor union for purposes of collective bargaining with Amtrak.

1059. Plaintiff LaSonya Rivers experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1060. Plaintiff LaSonya Rivers was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1061. By reason of such racial discrimination in employment by Amtrak, Plaintiff LaSonya Rivers has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1062. Plaintiff Frederic Roane is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1063. During such employment, Plaintiff Frederic Roane was represented by a labor union for purposes of collective bargaining with Amtrak.

1064. Plaintiff Frederic Roane experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1065. Plaintiff Frederic Roane was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1066. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frederic Roane has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1067. Plaintiff Sharon Montgomery Robinson is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1068. During such employment, Plaintiff Sharon Montgomery Robinson was represented by a labor union for purposes of collective bargaining with Amtrak.
1069. Plaintiff Sharon Montgomery Robinson experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1070. Plaintiff Sharon Montgomery Robinson was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1071. By reason of such racial discrimination in employment by Amtrak, Plaintiff Sharon Montgomery Robinson has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1072. Plaintiff Roy Rodriguez is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1073. During such employment, Plaintiff Roy Rodriguez was represented by a labor union for purposes of collective bargaining with Amtrak.
1074. Plaintiff Roy Rodriguez experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1075. Plaintiff Roy Rodriguez was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1076. By reason of such racial discrimination in employment by Amtrak, Plaintiff Roy Rodriguez has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1077. Plaintiff Romona Ross is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1078. During such employment, Plaintiff Romona Ross was represented by a labor union for purposes of collective bargaining with Amtrak.

1079. Plaintiff Romona Ross experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1080. Plaintiff Romona Ross was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1081. By reason of such racial discrimination in employment by Amtrak, Plaintiff Romona Ross has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1082. Plaintiff Howard Rowley is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1083. During such employment, Plaintiff Howard Rowley was represented by a labor union for purposes of collective bargaining with Amtrak.

1084. Plaintiff Howard Rowley experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1085. Plaintiff Howard Rowley was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1086. By reason of such racial discrimination in employment by Amtrak, Plaintiff Howard Rowley has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1087. Plaintiff Moses Rothchild is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1088. During such employment, Plaintiff Moses Rothchild was represented by a labor union for purposes of collective bargaining with Amtrak.

1089. Plaintiff Moses Rothchild experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1090. Plaintiff Moses Rothchild was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1091. By reason of such racial discrimination in employment by Amtrak, Plaintiff Moses Rothchild has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1092. Plaintiff Shelly Samuels is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1093. During such employment, Plaintiff Shelly Samuels was represented by a labor union for purposes of collective bargaining with Amtrak.

1094. Plaintiff Shelly Samuels experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1095. Plaintiff Shelly Samuels was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1096. By reason of such racial discrimination in employment by Amtrak, Plaintiff Shelly Samuels has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1097. Plaintiff Rashell Sanders is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1098. During such employment, Plaintiff Rashell Sanders was represented by a labor union for purposes of collective bargaining with Amtrak.
1099. Plaintiff Rashell Sanders experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1100. Plaintiff Rashell Sanders was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1101. By reason of such racial discrimination in employment by Amtrak, Plaintiff Rashell Sanders has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1102. Plaintiff Cynthia Sargent is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1103. During such employment, Plaintiff Cynthia Sargent was represented by a labor union for purposes of collective bargaining with Amtrak.

1104. Plaintiff Cynthia Sargent experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1105. Plaintiff Cynthia Sargent was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1106. By reason of such racial discrimination in employment by Amtrak, Plaintiff Cynthia Sargent has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1107. Plaintiff John Scott is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1108. During such employment, Plaintiff John Scott was represented by a labor union for purposes of collective bargaining with Amtrak.

1109. Plaintiff John Scott experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1110. Plaintiff John Scott was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1111. By reason of such racial discrimination in employment by Amtrak, Plaintiff John Scott has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1112. Plaintiff Shanetta Scott is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1113. During such employment, Plaintiff Shanetta Scott was represented by a labor union for purposes of collective bargaining with Amtrak.

1114. Plaintiff Shanetta Scott experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1115. Plaintiff Shanetta Scott was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1116. By reason of such racial discrimination in employment by Amtrak, Plaintiff Shanetta Scott has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1117. Plaintiff Tavio Scott is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1118. During such employment, Plaintiff Tavio Scott was represented by a labor union for purposes of collective bargaining with Amtrak.
1119. Plaintiff Tavio Scott experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1120. Plaintiff Tavio Scott was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1121. By reason of such racial discrimination in employment by Amtrak, Plaintiff Tavio Scott has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1122. Plaintiff Leonard Seamon is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1123. During such employment, Plaintiff Leonard Seamon was represented by a labor union for purposes of collective bargaining with Amtrak.
1124. Plaintiff Leonard Seamon experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1125. Plaintiff Leonard Seamon was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1126. By reason of such racial discrimination in employment by Amtrak, Plaintiff Leonard Seamon has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1127. Plaintiff Lillie King Shepard is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1128. During such employment, Plaintiff Lillie King Shepard was represented by a labor union for purposes of collective bargaining with Amtrak.

1129. Plaintiff Lillie King Shepard experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1130. Plaintiff Lillie King Shepard was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1131. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lillie King Shepard has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1132. Plaintiff Elaine Simmonds is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1133. During such employment, Plaintiff Elaine Simmonds was represented by a labor union for purposes of collective bargaining with Amtrak.

1134. Plaintiff Elaine Simmonds experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1135. Plaintiff Elaine Simmonds was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1136. By reason of such racial discrimination in employment by Amtrak, Plaintiff Elaine Simmonds has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1137. Plaintiff Jeanne Simmons is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1138. During such employment, Plaintiff Jeanne Simmons was represented by a labor union for purposes of collective bargaining with Amtrak.

1139. Plaintiff Jeanne Simmons experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1140. Plaintiff Jeanne Simmons was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1141. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jeanne Simmons has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1142. Plaintiff Rudy Singeltary is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1143. During such employment, Plaintiff Rudy Singeltary was represented by a labor union for purposes of collective bargaining with Amtrak.

1144. Plaintiff Rudy Singeltary experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1145. Plaintiff Rudy Singeltary was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1146. By reason of such racial discrimination in employment by Amtrak, Plaintiff Rudy Singeltary has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1147. Plaintiff Mathew Skidmore, Jr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1148. During such employment, Plaintiff Mathew Skidmore, Jr. was represented by a labor union for purposes of collective bargaining with Amtrak.

1149. Plaintiff Mathew Skidmore, Jr. experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1150. Plaintiff Mathew Skidmore, Jr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1151. By reason of such racial discrimination in employment by Amtrak, Plaintiff Mathew Skidmore, Jr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1152. Plaintiff Kimberly Diane Slaughter is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1153. During such employment, Plaintiff Kimberly Diane Slaughter was represented by a labor union for purposes of collective bargaining with Amtrak.

1154. Plaintiff Kimberly Diane Slaughter experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1155. Plaintiff Kimberly Diane Slaughter was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1156. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kimberly Diane Slaughter has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1157. Plaintiff Deborah Smallwood is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1158. During such employment, Plaintiff Deborah Smallwood was represented by a labor union for purposes of collective bargaining with Amtrak.

1159. Plaintiff Deborah Smallwood experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1160. Plaintiff Deborah Smallwood was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1161. By reason of such racial discrimination in employment by Amtrak, Plaintiff Deborah Smallwood has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1162. Plaintiff Louis Smith is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1163. During such employment, Plaintiff Louis Smith was represented by a labor union for purposes of collective bargaining with Amtrak.

1164. Plaintiff Louis Smith experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1165. Plaintiff Louis Smith was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1166. By reason of such racial discrimination in employment by Amtrak, Plaintiff Louis Smith has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1167. Plaintiff Janet Smith-Cook is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1168. During such employment, Plaintiff Janet Smith-Cook was represented by a labor union for purposes of collective bargaining with Amtrak.
1169. Plaintiff Janet Smith-Cook experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1170. Plaintiff Janet Smith-Cook was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1171. By reason of such racial discrimination in employment by Amtrak, Plaintiff Janet Smith-Cook has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1172. Plaintiff Darrell Soloman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1173. During such employment, Plaintiff Darrell Soloman was represented by a labor union for purposes of collective bargaining with Amtrak.
1174. Plaintiff Darrell Soloman experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1175. Plaintiff Darrell Soloman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1176. By reason of such racial discrimination in employment by Amtrak, Plaintiff Darrell Soloman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1177. Plaintiff Linda Stafford is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1178. During such employment, Plaintiff Linda Stafford was represented by a labor union for purposes of collective bargaining with Amtrak.

1179. Plaintiff Linda Stafford experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1180. Plaintiff Linda Stafford was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1181. By reason of such racial discrimination in employment by Amtrak, Plaintiff Linda Stafford has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1182. Plaintiff James Standifer is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1183. During such employment, Plaintiff James Standifer was represented by a labor union for purposes of collective bargaining with Amtrak.

1184. Plaintiff James Standifer experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1185. Plaintiff James Standifer was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1186. By reason of such racial discrimination in employment by Amtrak, Plaintiff James Standifer has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1187. Plaintiff Gail Steward is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1188. During such employment, Plaintiff Gail Steward was represented by a labor union for purposes of collective bargaining with Amtrak.

1189. Plaintiff Gail Steward experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1190. Plaintiff Gail Steward was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1191. By reason of such racial discrimination in employment by Amtrak, Plaintiff Gail Steward has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1192. Plaintiff Danny Stewart is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1193. During such employment, Plaintiff Danny Stewart was represented by a labor union for purposes of collective bargaining with Amtrak.

1194. Plaintiff Danny Stewart experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1195. Plaintiff Danny Stewart was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1196. By reason of such racial discrimination in employment by Amtrak, Plaintiff Danny Stewart has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1197. Plaintiff Royal Stewart is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1198. During such employment, Plaintiff Royal Stewart was represented by a labor union for purposes of collective bargaining with Amtrak.

1199. Plaintiff Royal Stewart experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1200. Plaintiff Royal Stewart was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1201. By reason of such racial discrimination in employment by Amtrak, Plaintiff Royal Stewart has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1202. Plaintiff Lawrence Sumpter is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1203. During such employment, Plaintiff Lawrence Sumpter was represented by a labor union for purposes of collective bargaining with Amtrak.

1204. Plaintiff Lawrence Sumpter experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1205. Plaintiff Lawrence Sumpter was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1206. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lawrence Sumpter has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1207. Plaintiff Shirley K. Taliaferro is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1208. During such employment, Plaintiff Shirley K. Taliaferro was represented by a labor union for purposes of collective bargaining with Amtrak.

1209. Plaintiff Shirley K. Taliaferro experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1210. Plaintiff Shirley K. Taliaferro was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1211. By reason of such racial discrimination in employment by Amtrak, Plaintiff Shirley K. Taliaferro has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1212. Plaintiff Bryant Thelwel is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1213. During such employment, Plaintiff Bryant Thelwel was represented by a labor union for purposes of collective bargaining with Amtrak.

1214. Plaintiff Bryant Thelwel experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1215. Plaintiff Bryant Thelwel was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1216. By reason of such racial discrimination in employment by Amtrak, Plaintiff Bryant Thelwel has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1217. Plaintiff Ronald Thomas is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1218. During such employment, Plaintiff Ronald Thomas was represented by a labor union for purposes of collective bargaining with Amtrak.

1219. Plaintiff Ronald Thomas experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1220. Plaintiff Ronald Thomas was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1221. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ronald Thomas has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1222. Plaintiff William Thomas is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1223. During such employment, Plaintiff William Thomas was represented by a labor union for purposes of collective bargaining with Amtrak.

1224. Plaintiff William Thomas experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1225. Plaintiff William Thomas was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1226. By reason of such racial discrimination in employment by Amtrak, Plaintiff William Thomas has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1227. Plaintiff Valerie Thorpe is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1228. During such employment, Plaintiff Valerie Thorpe was represented by a labor union for purposes of collective bargaining with Amtrak.

1229. Plaintiff Valerie Thorpe experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1230. Plaintiff Valerie Thorpe was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1231. By reason of such racial discrimination in employment by Amtrak, Plaintiff Valerie Thorpe has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not

limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1232. Plaintiff Jewell Tilghman is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1233. During such employment, Plaintiff Jewell Tilghman was represented by a labor union for purposes of collective bargaining with Amtrak.

1234. Plaintiff Jewell Tilghman experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1235. Plaintiff Jewell Tilghman was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1236. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jewell Tilghman has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1237. Plaintiff Jarl Tobias is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1238. During such employment, Plaintiff Jarl Tobias was represented by a labor union for purposes of collective bargaining with Amtrak.

1239. Plaintiff Jarl Tobias experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1240. Plaintiff Jarl Tobias was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1241. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jarl Tobias has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1242. Plaintiff Dawn Turner is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1243. During such employment, Plaintiff Dawn Turner was represented by a labor union for purposes of collective bargaining with Amtrak.

1244. Plaintiff Dawn Turner experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1245. Plaintiff Dawn Turner was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1246. By reason of such racial discrimination in employment by Amtrak, Plaintiff Dawn Turner has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1247. Plaintiff Cheryl Tyler is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1248. During such employment, Plaintiff Cheryl Tyler was represented by a labor union for purposes of collective bargaining with Amtrak.

1249. Plaintiff Cheryl Tyler experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1250. Plaintiff Cheryl Tyler was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1251. By reason of such racial discrimination in employment by Amtrak, Plaintiff Cheryl Tyler has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1252. Plaintiff Kathy Virdure is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1253. During such employment, Plaintiff Kathy Virdure was represented by a labor union for purposes of collective bargaining with Amtrak.

1254. Plaintiff Kathy Virdure experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1255. Plaintiff Kathy Virdure was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1256. By reason of such racial discrimination in employment by Amtrak, Plaintiff Kathy Virdure has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1257. Plaintiff Eileen Vyhuis is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1258. During such employment, Plaintiff Eileen Vyhuis was represented by a labor union for purposes of collective bargaining with Amtrak.

1259. Plaintiff Eileen Vyhuis experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1260. Plaintiff Eileen Vyhuis was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1261. By reason of such racial discrimination in employment by Amtrak, Plaintiff Eileen Vyhuis has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1262. Plaintiff Everett Wair, Sr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1263. During such employment, Plaintiff Everett Wair, Sr. was represented by a labor union for purposes of collective bargaining with Amtrak.

1264. Plaintiff Everett Wair, Sr. experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1265. Plaintiff Everett Wair, Sr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1266. By reason of such racial discrimination in employment by Amtrak, Plaintiff Everett Wair, Sr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1267. Plaintiff Valerie Walker is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1268. During such employment, Plaintiff Valerie Walker was represented by a labor union for purposes of collective bargaining with Amtrak.
1269. Plaintiff Valerie Walker experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1270. Plaintiff Valerie Walker was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1271. By reason of such racial discrimination in employment by Amtrak, Plaintiff Valerie Walker has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1272. Plaintiff Frederick Wall is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1273. During such employment, Plaintiff Frederick Wall was represented by a labor union for purposes of collective bargaining with Amtrak.
1274. Plaintiff Frederick Wall experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1275. Plaintiff Frederick Wall was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1276. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frederick Wall has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1277. Plaintiff Lee Flora Wayne is an African-American citizen of the United States and applied for employment at Amtrak during the former class liability period alleged in *Campbell*.

1278. The position or positions for which Plaintiff Lee Flora Wayne applied were represented by a labor union for purposes of collective bargaining with Amtrak.

1279. Plaintiff Lee Flora Wayne experienced intentional racial discrimination by Amtrak in the denial of her application or applications and refusal to hire her and/or with regard testing and/or denial of testing opportunities.

1280. Plaintiff Lee Flora Wayne experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1281. By reason of such racial discrimination in employment by Amtrak, Plaintiff Lee Flora Wayne has suffered the loss of compensation, wages, back pay and front pay, other employment

benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1282. Plaintiff William Waytes is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1283. During such employment, Plaintiff William Waytes was represented by a labor union for purposes of collective bargaining with Amtrak.

1284. Plaintiff William Waytes experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1285. Plaintiff William Waytes was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1286. By reason of such racial discrimination in employment by Amtrak, Plaintiff William Waytes has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1287. Plaintiff Angela Weaver is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1288. During such employment, Plaintiff Angela Weaver was represented by a labor union for purposes of collective bargaining with Amtrak.

1289. Plaintiff Angela Weaver experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1290. Plaintiff Angela Weaver was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1291. By reason of such racial discrimination in employment by Amtrak, Plaintiff Angela Weaver has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1292. Plaintiff Patricia Wellington is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1293. During such employment, Plaintiff Patricia Wellington was represented by a labor union for purposes of collective bargaining with Amtrak.
1294. Plaintiff Patricia Wellington experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1295. Plaintiff Patricia Wellington was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1296. By reason of such racial discrimination in employment by Amtrak, Plaintiff Patricia Wellington has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1297. Plaintiff Garolyn Wells is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1298. During such employment, Plaintiff Garolyn Wells was represented by a labor union for purposes of collective bargaining with Amtrak.
1299. Plaintiff Garolyn Wells experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1300. Plaintiff Garolyn Wells was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1301. By reason of such racial discrimination in employment by Amtrak, Plaintiff Garolyn Wells has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1302. Plaintiff Ronald Wells is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1303. During such employment, Plaintiff Ronald Wells was represented by a labor union for purposes of collective bargaining with Amtrak.
1304. Plaintiff Ronald Wells experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1305. Plaintiff Ronald Wells was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1306. By reason of such racial discrimination in employment by Amtrak, Plaintiff Ronald Wells has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1307. Plaintiff Jimmy Lee Whitley is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1308. During such employment, Plaintiff Jimmy Lee Whitley was represented by a labor union for purposes of collective bargaining with Amtrak.
1309. Plaintiff Jimmy Lee Whitley experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1310. Plaintiff Jimmy Lee Whitley was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1311. By reason of such racial discrimination in employment by Amtrak, Plaintiff Jimmy Lee Whitley has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1312. Plaintiff Evelyn Whitlow is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1313. During such employment, Plaintiff Evelyn Whitlow was represented by a labor union for purposes of collective bargaining with Amtrak.

1314. Plaintiff Evelyn Whitlow experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1315. Plaintiff Evelyn Whitlow was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1316. By reason of such racial discrimination in employment by Amtrak, Plaintiff Evelyn Whitlow has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1317. Plaintiff Carolyn Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1318. During such employment, Plaintiff Carolyn Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1319. Plaintiff Carolyn Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1320. Plaintiff Carolyn Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1321. By reason of such racial discrimination in employment by Amtrak, Plaintiff Carolyn Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1322. Plaintiff Frank Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1323. During such employment, Plaintiff Frank Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1324. Plaintiff Frank Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1325. Plaintiff Frank Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1326. By reason of such racial discrimination in employment by Amtrak, Plaintiff Frank Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1327. Plaintiff Johnny Williams, Jr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1328. During such employment, Plaintiff Johnny Williams, Jr. was represented by a labor union for purposes of collective bargaining with Amtrak.

1329. Plaintiff Johnny Williams, Jr. experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1330. Plaintiff Johnny Williams, Jr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1331. By reason of such racial discrimination in employment by Amtrak, Plaintiff Johnny Williams, Jr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1332. Plaintiff Leticia Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1333. During such employment, Plaintiff Leticia Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1334. Plaintiff Leticia Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1335. Plaintiff Leticia Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1336. By reason of such racial discrimination in employment by Amtrak, Plaintiff Leticia Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1337. Plaintiff Portia Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1338. During such employment, Plaintiff Portia Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1339. Plaintiff Portia Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1340. Plaintiff Portia Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1341. By reason of such racial discrimination in employment by Amtrak, Plaintiff Portia Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1342. Plaintiff Rene Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1343. During such employment, Plaintiff Rene Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1344. Plaintiff Rene Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1345. Plaintiff Rene Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1346. By reason of such racial discrimination in employment by Amtrak, Plaintiff Rene Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1347. Plaintiff Robert Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.
1348. During such employment, Plaintiff Robert Williams was represented by a labor union for purposes of collective bargaining with Amtrak.
1349. Plaintiff Robert Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.
1350. Plaintiff Robert Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.
1351. By reason of such racial discrimination in employment by Amtrak, Plaintiff Robert Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.
1352. Plaintiff Ronnie Williams, Sr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1353. Plaintiff Terrence Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1354. During such employment, Plaintiff Terrence Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1355. Plaintiff Terrence Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1356. Plaintiff Terrence Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1357. By reason of such racial discrimination in employment by Amtrak, Plaintiff Terrence Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1358. Plaintiff Theresa Williams is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1359. During such employment, Plaintiff Theresa Williams was represented by a labor union for purposes of collective bargaining with Amtrak.

1360. Plaintiff Theresa Williams experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work

hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1361. Plaintiff Theresa Williams was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1362. By reason of such racial discrimination in employment by Amtrak, Plaintiff Theresa Williams has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1363. Plaintiff Garner Willis, Jr. is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1364. During such employment, Plaintiff Garner Willis, Jr. was represented by a labor union for purposes of collective bargaining with Amtrak.

1365. Plaintiff Garner Willis, Jr. experienced intentional racial discrimination by Amtrak in regard to some or all of the following: position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1366. Plaintiff Garner Willis, Jr. was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1367. By reason of such racial discrimination in employment by Amtrak, Plaintiff Garner Willis, Jr. has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm,

including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1368. Plaintiff Eric Woodruff is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1369. During such employment, Plaintiff Eric Woodruff was represented by a labor union for purposes of collective bargaining with Amtrak.

1370. Plaintiff Eric Woodruff experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1371. Plaintiff Eric Woodruff was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1372. By reason of such racial discrimination in employment by Amtrak, Plaintiff Eric Woodruff has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1373. Plaintiff Curtis Yates is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1374. During such employment, Plaintiff Curtis Yates was represented by a labor union for purposes of collective bargaining with Amtrak.

1375. Plaintiff Curtis Yates experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1376. Plaintiff Curtis Yates was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1377. By reason of such racial discrimination in employment by Amtrak, Plaintiff Curtis Yates has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

1378. Plaintiff Geary Young is an African-American citizen of the United States and was employed at Amtrak during the former class liability period alleged in *Campbell*.

1379. During such employment, Plaintiff Geary Young was represented by a labor union for purposes of collective bargaining with Amtrak.

1380. Plaintiff Geary Young experienced intentional racial discrimination by Amtrak in regard to position selection decisions and processes, including promotions, transfers, testing, and denial of testing opportunities, training, job assignments, work assignments, scheduling of work hours and vacation time, discipline, discharge, furlough and recall from furlough, and other terms and conditions of employment.

1381. Plaintiff Geary Young was subjected to racial harassment and a racially hostile work environment during Plaintiff's employment at Amtrak.

1382. By reason of such racial discrimination in employment by Amtrak, Plaintiff Geary Young has suffered the loss of compensation, wages, back pay and front pay, other employment benefits, and, further, has suffered great mental, emotional, and physical harm, including but not limited to embarrassment, emotional distress, humiliation, indignity, anxiety, and resulting injury and loss caused by such violations.

V. The Civil Rights Act of 1866, 42 U.S.C. §1981

1383. The Plaintiffs restate and reallege paragraphs 1 through 1382 as though set forth here in full.

1384. Amtrak has discriminated against the named Plaintiffs by denying them the same rights as are enjoyed by white non-exempt Amtrak employees and applicants for non-exempt employment at Amtrak in the making, performance, modification and termination of their employment relationship with Amtrak and to the enjoyment of all benefits, privileges, terms and conditions of that relationship, in violation of the Civil Rights Act of 1866, 42 U.S.C. §1981, as amended.

1385. Amtrak's conduct has been intentional, deliberate, willful, and conducted in callous disregard of the rights of the named Plaintiffs.

1386. By reason of the continuous nature of Amtrak's discriminatory conduct, persistent throughout the employment of the named Plaintiffs, the named Plaintiffs are entitled to application of the continuing violation doctrine to all of the violations alleged herein.

1387. By reason of Amtrak's discrimination, the named Plaintiffs are entitled to all legal and equitable remedies available under §1981, including, but not limited to, damages for mental anguish and punitive damages.

VI. PRAYER FOR RELIEF

1388. Wherefore, the named Plaintiffs request the following relief:

- A. A declaratory judgment that Amtrak's employment policies, practices and procedures challenged herein are illegal and in violation of 42 U.S.C. §1981;
- B. A permanent injunction against Amtrak and its partners, officers, owners, agents, successors, employees, and representatives and any and all persons acting in concert with them, from engaging in any further unlawful decisions, practices, policies, customs, usages, racial discrimination and retaliation by Amtrak as set forth herein;
- C. An Order placing or restoring the named Plaintiffs into those jobs they would now be occupying, but for Amtrak's discriminatory decisions, policies, practices, and procedures;
- D. An Order directing Amtrak to adjust the wage rates and benefits for the named Plaintiffs to the level that they would be enjoying but for Amtrak's discriminatory decisions, policies, practices and procedures;
- E. An award of back pay, front pay, compensatory damages, punitive damages, lost benefits, preferential rights to jobs, and other damages for lost compensation and job benefits suffered by the named Plaintiffs;
- F. Any other appropriate equitable relief to the named Plaintiffs;
- G. An award of litigation costs and expenses, including reasonable attorneys' fees, to the Plaintiffs;
- H. Pre-judgment interest;
- I. Such other and further relief as the Court may deem just and proper; and Retention of jurisdiction by the Court until such time as the Court is satisfied that Amtrak has remedied the practices complained of herein and is determined to be in full compliance with the law.

VII. JURY DEMAND

The Plaintiffs demand trial by jury of all issues triable of right to a jury.

April 26, 2021

Respectfully Submitted,

/s/ Timothy B. Fleming

Timothy B. Fleming (D.C. Bar No. 351114)

WIGGINS CHILDS PANTAZIS FISHER GOLDFARB, PLLC

1211 Connecticut Avenue, N.W., Suite 420

Washington, D.C. 20036

Tel. (202) 467-4489

Fax (202) 467-4489

tfleming@wigginschilds.com

Attorney for Plaintiffs