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Attorneys for Plaintiff April Curley and the Putative Class

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

APRIL CURLEY, individually and behalf of  
all others similarly situated,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

CASE NO:

**COMPLAINT**

Class Action

Jury Trial Demanded

**COMPLAINT**

**CLASS ACTION**

COMPLAINT

1 Plaintiff April Curley (“Curley”), individually and on behalf of all others similarly  
2 situated, by and through her attorneys, Ben Crump Law, PLLC, Stowell & Friedman, Ltd., and  
3 Sani Law, APC, hereby files this Complaint against Defendant Google, LLC (“Defendant” or  
4 “Google”) and in support states as follows:  
5

6 **NATURE OF THE ACTION**

7 1. Google famously adopted “don’t be evil” as a core value in its early days. Yet as it  
8 grew into one of the world’s largest corporate behemoths, Google practiced one of this nation’s  
9 oldest evils—race discrimination.

10 2. Pursuant to its strong, racially biased corporate culture, Google is engaged in a  
11 pattern and practice of race discrimination against its African American and Black employees.  
12 Google’s centralized leadership, which is nearly devoid of Black representation, holds biased and  
13 stereotypical views about the abilities and potential of Black professionals. As a result, and  
14 pursuant to company-wide discriminatory policies and practices, Google hires few Black  
15 employees and steers those few Black employees into lower-level roles, pays them less, and  
16 denies them advancement and leadership roles because of their race. Black Google employees  
17 face a hostile work environment and suffer retaliation if they dare to challenge or oppose the  
18 company’s discriminatory practices. As a result, Black employees at Google earn and advance  
19 less than non-Black employees and suffer higher rates of attrition.  
20

21 3. Plaintiff was harmed by Google’s racially hostile work environment and company-  
22 wide discriminatory practices. Due to its abysmal representation of Black professionals since its  
23 founding and growing public awareness of its lack of commitment to genuine diversity and  
24 inclusion, Google hired Plaintiff in 2014 to expand its outreach to Black college students. Like  
25  
26

1 other Black professionals, Google placed Plaintiff in a lower job grade and title than her work and  
2 responsibilities warranted and denied her pay and promotion opportunities because of her race.  
3 Plaintiff and other Black professionals were often pigeon-holed into dead-end jobs—with less  
4 visibility, lower pay, and no advancement opportunities. As Plaintiff's success in recruiting  
5 talented, well-qualified Black candidates grew, she discovered that Google was not genuinely  
6 interested in actual diversity and equal employment opportunities but wanted only to burnish its  
7 public image for marketing purposes. Google wanted Plaintiff, as an African American woman,  
8 to quietly put on a good face for the company and toe the company line. But Plaintiff was  
9 unwilling to be used as a mere marketing ploy. Plaintiff was a champion for Black employees and  
10 Black students; she vocally opposed and called for reform of the barriers and double standards  
11 Google imposed on Black employees and applicants. In response to her advocacy for herself and  
12 other Black employees subjected to Google's discriminatory practices, Google unlawfully  
13 marginalized, undermined, and ultimately terminated Plaintiff because of her race and her  
14 protected activity.

17 4. Plaintiff brings this action on behalf of herself and a class of current and former  
18 Black Google employees in order to hold Google accountable for its systemic race discrimination,  
19 to redress Google's discrimination against Black professionals across the country, and to achieve  
20 necessary reforms and injunctive relief to end Google's discriminatory employment practices and  
21 provide equal opportunities for all Google employees.

#### 22 **JURISDICTION AND VENUE**

24 5. Plaintiff's claims arise under 42 U.S.C. § 1981, and this Court has jurisdiction  
25 over this matter pursuant to 28 U.S.C. §§ 1331, 1332, and 1343. This Court has supplemental  
26

1 jurisdiction over Plaintiff's state-law claims under 28 U.S.C. § 1367 because they arise out of the  
2 same nucleus of operative facts.

3           6. Venue is proper in the Northern District of California pursuant to 28 U.S.C.  
4 § 1391(b) because Google resides and maintains its principal place of business and headquarters  
5 in this District and the practices challenged by this lawsuit were issued in this District. Venue is  
6 proper in the San Jose Division of the Northern District of California because a substantial part of  
7 the events or omissions giving rise to the claims occurred in the county of Santa Clara.  
8

9 **PARTIES**

10           7. Google, LLC is one of the largest companies in the world. Google develops and  
11 sells technology products and services. Google services generated over \$168 billion in revenue in  
12 2020. Google was originally incorporated as Google Inc. but in a 2015 corporate restructuring  
13 converted to an LLC. Google is now a wholly owned subsidiary of XXVI Holdings, Inc., which is  
14 incorporated in Delaware with a principal place of business in Mountain View, California.  
15 Google's publicly traded ultimate parent company, Alphabet Inc., has a market capitalization of  
16 over \$1.7 trillion as of this filing, placing it third among the most valuable companies in America  
17 and fourth globally.  
18

19           8. Google maintains its corporate headquarters at 1600 Amphitheatre Parkway,  
20 Mountain View, California 94043. Google employs over 21,000 employees at its corporate  
21 headquarters, and tens of thousands of employees across the United States.  
22

23           9. Plaintiff April Curley is an African American woman and was employed by  
24 Google as a University Programs Specialist in New York City, New York from 2014 until she  
25 was unlawfully terminated in September 2020. Throughout her employment, Curley worked  
26

1 diligently and performed at a high level for Google. Nonetheless, pursuant to Defendant's  
2 nationwide pattern or practice of race discrimination, Google paid Curley lower wages and denied  
3 her advancement opportunities because of her race, and subjected her to a hostile work  
4 environment and retaliation.

### 5 **FACTUAL ALLEGATIONS**

#### 6 **Google Systematically Discriminates Against Black Employees**

7  
8 10. Google is engaged in a nationwide pattern or practice of intentional race  
9 discrimination and retaliation and maintains employment policies and practices that have a  
10 disparate impact against Black employees throughout the United States.

11 11. Google's overwhelmingly non-Black executives hold racially biased, stereotypical,  
12 and harmful views of Black employees. Indeed, the California Department of Fair Employment  
13 and Housing is currently investigating Google for its treatment of Black female employees.<sup>1</sup>

14  
15 12. Google's racially biased corporate culture and discriminatory practices extend far  
16 beyond its California headquarters. Pursuant to discriminatory company-wide policies and  
17 practices, Google favors white men and hires few Black employees and assigns the few Black  
18 employees it hires into lower-paying, lower-prestige roles with fewer opportunities for  
19 advancement than Google's non-Black employees.

20 13. When Google hired Plaintiff in 2014, for instance, only 628 of its over 32,000  
21 employees—1.9%—identified as Black or African American. At that time, Google had only one  
22 Black or African American top-level executive out of 25. Over the next two years Google added 5  
23 White top-level executives, but the African American count remained at one. By 2020, despite  
24

25  
26 <sup>1</sup> <https://www.nbcnews.com/news/nbcblk/california-investigates-googles-treatment-black-women-workers-rcna9154>

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