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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

APRIL CURLEY, DESIREE MAYON,
RONIKA LEWIS, RAYNA REID, ANIM
AWEH, and EBONY THOMAS, individually
and behalf of all others similarly situated,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

CASE NO: 4:22-cv-01735-YGR

SECOND AMENDED COMPLAINT

Class Action

Jury Trial Demanded

SECOND AMENDED COMPLAINT

CLASS ACTION

1 Plaintiffs April Curley (“Curley”), Desiree Mayon (“Mayon”), Ronika Lewis (“Lewis”),
2 Rayna Reid (“Reid”), Anim Aweh (“Aweh”), and Ebony Thomas (“Thomas”) (collectively,
3 “Plaintiffs”), individually and on behalf of all others similarly situated, by and through their
4 attorneys, Ben Crump Law, PLLC, Stowell & Friedman, Ltd., and Sani Law, APC, hereby file
5 this Second Amended Complaint against Defendant Google, LLC (“Defendant” or “Google”) and
6 in support state as follows:
7

8 **NATURE OF THE ACTION**

9 1. Google famously adopted “don’t be evil” as a core value in its early days. Yet it
10 has grown into one of the world’s largest corporate behemoths, Google has practiced one of this
11 nation’s oldest evils—race discrimination.
12

13 2. Pursuant to its strong, racially biased corporate culture, Google is engaged in a
14 pattern and practice of systemic race discrimination against its African American and Black
15 employees and job applicants. Google’s centralized leadership, which is nearly devoid of Black
16 representation, holds biased and stereotypical views about the abilities and potential of Black
17 professionals. As a result, and pursuant to company-wide discriminatory policies and practices,
18 Google refuses to hire extraordinarily qualified Black job applicants, and subjects the few Black
19 employees it does hire to wildly differential treatment. Google assigns Black professionals to
20 lower-level roles, pays them less, unfairly rates their performance, and denies them advancement
21 and leadership roles because of their race. Black professionals at Google face a racially hostile
22 work environment and suffer retaliation if they dare to challenge or oppose the company’s
23 discriminatory practices. As a result, Black employees at Google earn and advance less than non-
24 Black employees and suffer higher rates of attrition.
25
26

SECOND AMENDED

1 3. Plaintiffs have been harmed by Google’s racially hostile work environment and
2 company-wide discriminatory practices. Due to its abysmal representation of Black professionals
3 since its founding and growing public awareness of its lack of commitment to genuine diversity
4 and inclusion, Google hired Plaintiff Curley in 2014 to expand its outreach to Black college
5 students. Like other Black professionals, including Plaintiffs Mayon, Lewis, and Reid, Google
6 placed Curley in a lower job grade and title than her work and responsibilities warranted and
7 denied her pay and promotion opportunities because of her race. Plaintiffs Curley, Mayon, Lewis,
8 Reid and other Black professionals were often pigeon-holed into dead-end jobs—with less
9 visibility, lower pay, and no advancement opportunities.
10

11 4. As Curley brought talented, qualified Black candidates to Google, she discovered
12 Google did not really care about diversity and equal employment opportunities but sought only to
13 burnish its public image for marketing purposes. Google wanted Curley, as an African American
14 woman, to quietly put on a good face for the company and toe the company line. But Curley was
15 unwilling to be used as a mere marketing ploy. Curley was a champion for Black employees and
16 Black students; she vocally opposed and called for reform of the barriers and double standards
17 Google imposed on Black employees and applicants. In response to her advocacy for herself and
18 other Black employees subjected to Google’s discriminatory practices, Google unlawfully
19 marginalized, undermined, and ultimately terminated Curley because of her race and her
20 protected activity. Consistent with Google’s retaliation against Curley for speaking out against
21 the company’s discrimination, Google similarly targeted Plaintiffs Mayon, Lewis and Reid for
22 reporting their own discriminatory treatment.
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SECOND AMENDED

1 5. Like many of the talented Black candidates Curley presented to Google, Plaintiffs
2 Aweh and Thomas experienced Google’s discriminatory hiring practices first-hand. Despite their
3 outstanding credentials and experience, Google refused them employment because of their race.
4 Indeed, after Plaintiff Thomas successfully completed a rigorous application and interview
5 process, she was rejected as not a “cultural fit” or “Googly” enough, a racial dog whistle that is
6 code for race discrimination. Aweh was similarly denied over 10 jobs for which she was well
7 qualified.
8

9 6. Plaintiffs bring this action on behalf of themselves and a class of current and
10 former Black Google employees and rejected applicants in order to hold Google accountable for
11 its systemic race discrimination, to redress Google’s discrimination against Black professionals
12 across the country, and to achieve necessary reforms and injunctive relief to end Google’s
13 discriminatory employment practices and provide equal opportunities for all Google employees.
14

15 **JURISDICTION AND VENUE**

16 7. Plaintiffs’ claims arise under 42 U.S.C. § 1981, Title VII of the Civil Rights Act of
17 1964, as amended, 42 U.S.C. § 2000e, et seq. (“Title VII”), and this Court has jurisdiction over
18 this matter pursuant to 28 U.S.C. §§ 1331, 1332, and 1343. This Court has supplemental
19 jurisdiction over Plaintiffs’ state-law claims under 28 U.S.C. § 1367 because they arise out of the
20 same nucleus of operative facts.
21

22 8. Venue is proper in the Northern District of California pursuant to 28 U.S.C.
23 § 1391(b) because Google resides and maintains its principal place of business and headquarters
24 in this District and the practices challenged by this lawsuit were issued in this District.
25
26

SECOND AMENDED

PARTIES

9. Google, LLC is one of the largest companies in the world. Google develops and sells technology products and services. Google services generated over \$257 billion in revenue in 2021.¹ Google was originally incorporated as Google Inc. but in a 2015 corporate restructuring converted to an LLC. Google is now a wholly-owned subsidiary of XXVI Holdings, Inc., which is incorporated in Delaware with a principal place of business in Mountain View, California. Google's publicly traded ultimate parent company, Alphabet Inc., has a market capitalization of over \$1.7 trillion as of this filing, placing it third among the most valuable companies in America and fourth globally.

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

11. Plaintiff April Curley is an African American woman and was employed by Google as a University Programs Specialist in New York City, New York from 2014 until she was unlawfully terminated in September 2020. Throughout her employment, Curley worked diligently and performed at a high level for Google. Nonetheless, pursuant to Defendant's nationwide pattern or practice of race discrimination and discriminatory employment practices, Google paid Curley lower wages and denied her advancement opportunities because of her race, and subjected her to a hostile work environment and retaliation.

¹ Alphabet Inc., Form 10-K at 32 (Feb. 2, 2022), <https://www.sec.gov/ix?doc=/Archives/edgar/data/1652044/000165204422000019/goog-20211231.htm>

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