

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

PINTEREST, INC., DOES 1 through 20, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

FRANCOISE BROUGHER

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. ¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

San Francisco Superior Court, 400 McAllister Street, San Francisco, CA 94102

CASE NUMBER: (Número del Caso):
CGC-20-585888

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: (El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

David A. Lowe, Rudy, Exelrod, Zieff & Lowe, LLP, 351 California St., Suite 700, San Francisco, CA 94104; Tel: 415-434-9800

DATE:
(Fecha) **AUG 11 2020**

Clerk of the Court

Clerk, by
(Secretario)

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)

ANGELICA SUNGA



NOTICE TO THE PERSON SERVED: You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
- by personal delivery on (date)

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8 *Attorneys for Plaintiff*
FRANCOISE BROUGHNER
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF SAN FRANCISCO

12
13 FRANCOISE BROUGHNER,
14 Plaintiff,
15 vs.
16 PINTEREST, INC., DOES 1 through 20,
17 inclusive,
18 Defendants.
19
20 _____ /

FILED
Superior Court of California
County of San Francisco

AUG 11 2020

CLERK OF THE COURT

BY: ANGELICA SUNGA Deputy Clerk

CGC-20-585888
Case No. _____

COMPLAINT FOR DAMAGES
DEMAND FOR JURY TRIAL

BY

1 FRANCOISE BROUGHER, complains and alleges as follows:

2 **NATURE OF THE CASE**

3 1. Even at the very top ranks of a public company, female executives can be targeted
4 for sex discrimination and retaliation. Although Pinterest markets itself to women looking for
5 inspiration, the company brazenly fired its top female executive for pointing out gender bias
6 within Pinterest's male-dominated leadership team. For two years, Plaintiff Francoise Brougher
7 was Pinterest's high-performing Chief Operating Officer and helped take the company public.
8 However, whereas male executives were rewarded for strong leadership styles, Ms. Brougher
9 was criticized for not being compliant or collaborative enough. In addition, Ms. Brougher was
10 offered a less favorable compensation structure than her male peers and had to fight for equal
11 treatment. Finally, when Ms. Brougher complained to the head of Human Resources and to
12 Chief Executive Officer Ben Silbermann that Pinterest's Chief Financial Officer made
13 demeaning sexist comments to her, and she asked for help to remedy the hostile work
14 environment, Mr. Silbermann summarily fired her over a video call.

15 2. Instead of taking her complaint seriously, investigating it properly, and doing the
16 hard work to address her concerns about gender discrimination and hostility, Pinterest fired
17 Ms. Brougher to protect the comfort of her male peers. In an attempt to cover up Ms. Brougher's
18 complaints, Pinterest tried to create a fiction that her firing was a voluntary departure.
19 Ms. Brougher's termination solidified Pinterest's unwelcoming environment for women and
20 minorities by imposing a high cost to challenging the men at the top.

21 3. Although Pinterest publicly laments the lack of diversity in its leadership, in
22 practice, it turns a blind eye to the biased thinking that limit women's opportunities for success in
23 leadership roles. By terminating an outspoken leader with Ms. Brougher's impressive
24 credentials, Pinterest further entrenched its workplace inequities.

25 4. Ms. Brougher brings this lawsuit to change Pinterest's culture of gender bias and
26 to hold Pinterest accountable for discrimination, retaliation, and wrongful termination in violation
27 of the Fair Employment and Housing Act (FEHA), and the Labor Code.

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PARTIES

5. Plaintiff Francoise Brougher was employed by Defendant Pinterest, Inc. from March 2018 until her termination in April 2020. She is a resident of Los Altos Hills, California.

6. Upon information and belief, Defendant Pinterest, Inc. is a Delaware corporation, registered in the State of California, whose primary place of business is the City and County of San Francisco, California.

7. The true names and capacities of Defendants named herein as Does 1 through 20, whether individual, corporate, associate or otherwise, and the true involvement of Defendants sued herein as Does 1 through 20, are unknown to Plaintiff who therefore sues said Defendants by such fictitious names. Plaintiff will amend this Complaint to show the true names, capacities, and involvement of Does 1 through 20 when ascertained. Plaintiff is informed and believes and thereon alleges that each of the Defendants designated as a “Doe” is responsible in some manner for the events and happenings referred to herein, and that Plaintiff’s injuries and damages as hereinafter set forth were proximately caused by said Defendants.

8. Plaintiff is informed and believes and thereon alleges that each of the Defendants sued herein is or was the agent, employee, partner and/or representative of one or more of the remaining Defendants, and each of them was at all times acting within the purpose and scope of such agency and employment. Plaintiff is further informed and believes that each of the Defendants herein gave consent to, ratified, and authorized the acts alleged herein to each of the remaining Defendants.

JURISDICTION AND VENUE

9. Venue is proper in this judicial district pursuant to California Code of Civil Procedure § 395(a) and California Government Code § 12965. Defendant’s Principal Executive Office is in the City and County of San Francisco. Defendant transacts business in San Francisco. Defendant is within the jurisdiction of this Court for the purposes of service of process.

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1 10. Plaintiff was employed in, and significant events material to this case occurred
 2 within, San Francisco. The obligations and liability complained of herein arose in San Francisco,
 3 and Plaintiff suffered injury in San Francisco.

4 **PROCEDURAL ALLEGATIONS**

5 11. On August 7, 2020, Ms. Brougher filed a complaint with the Department of Fair
 6 Employment and Housing against Pinterest, alleging gender discrimination and retaliation, and
 7 obtained a Right-to-Sue notice the same day.

8 **FACTS COMMON TO ALL CAUSES OF ACTION**

9 12. Ms. Brougher has had an outstanding career in Silicon Valley. She arrived in the
 10 United States in her 20s on a student visa and with only a loan to support her, and has been a
 11 technology executive for the past twenty years, serving some of the Valley's most successful
 12 companies.

13 13. Before joining Pinterest, Ms. Brougher was an executive at Charles Schwab,
 14 Google, and Square. She led Google's Bizops group when the company was in a period of
 15 exponential growth. She worked on a breadth of issues, including Google's engineering
 16 organization model, large scale acquisitions and integrations, and Google's initial expansion into
 17 Africa. She later managed all of Ad Sales globally for the torso and tail advertisers and was
 18 responsible for a \$16 billion advertising business. During her four-and-a-half-year tenure, the
 19 revenue growth moved from high single digits to over 25 percent year over year growth for this
 20 segment of advertisers.

21 14. At Square, Ms. Brougher had the opportunity to help a smaller company scale and
 22 define its business strategy. Ms. Brougher worked on initiatives such as expanding Pinterest's
 23 customer base to include larger retailers, the creation of Square's partner ecosystem, and
 24 redefining its go-to-market strategy. She scaled across many functions, including Sales, Account
 25 Management, Customer Success, Business Development, and Marketing. And she was part of
 26 the leadership team that took the company public.

27 15. For over eight years, Ms. Brougher has been an engaged member of Sodexo's
 28 Board, a French multinational operating in over 70 countries.

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