

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARGARET CURTIN,

Plaintiff,

v.

CAMBRIDGE HEALTH ALLIANCE,

Defendant.

Civil Action No. 1:24-cv-10840-LTS

**DEFENDANT CAMBRIDGE HEALTH ALLIANCE’S ANSWER TO PLAINTIFF
MARGARET CURTIN’S FIRST AMENDED COMPLAINT**

For its answers and defenses to the Complaint and Jury Demand of plaintiff Margaret Curtin (“Plaintiff”), defendant Cambridge Health Alliance (“Defendant” or “CHA”) states as set forth herein. Answers to each paragraph of the Complaint are made without waiving, but expressly reserving, all rights that CHA may have to seek relief by appropriate motions directed to the allegations of the Complaint.

INTRODUCTION

1. Defendant is without sufficient information or knowledge to confirm or deny whether Plaintiff is a “practicing Christian” and whether she is a “Board Certified Family Medicine Nurse Practitioner.” Defendant admits that Plaintiff is seeking damages against CHA but denies that Plaintiff is entitled to any such relief.

I. PARTIES

2. Defendant is without sufficient information or knowledge to confirm or deny Plaintiff’s age at the time her employment with CHA ended. Defendant admits that Plaintiff was employed by CHA as a Family Nurse Practitioner for a little over twenty eight years. CHA is without

sufficient information or knowledge to confirm or deny whether Plaintiff is “board certified.” Defendant denies the remaining allegations in Paragraph 2.

3. Defendant admits that Plaintiff was employed by Cambridge Health Alliance and worked at CHA’s East Cambridge Health Center.

4. Defendant admits that one of CHA’s hospital campuses is located at 1493 Cambridge Street, Cambridge, MA 02139.

5. Admitted.

6. Defendant states that the allegations in Paragraph 6 are vague and ambiguous and are therefore not susceptible to a response. To the extent a response is required, Defendant denies the allegations in Paragraph 6 to the extent it characterizes a written document, the contents of which speak for itself.

7. Defendant states that the allegations in Paragraph 7 are vague and ambiguous and are therefore not susceptible to a response. To the extent a response is required, Defendant denies the allegations in Paragraph 7 to the extent it characterizes a written document, the contents of which speak for itself.

8. Denied.

9. Defendant states that Paragraph 9 states a legal conclusion to which no response is required. To the extent that a response is required, Defendant denies Plaintiff’s characterization of its corporate structure, but admits that CHA is an employer with more than 15 employees.

10. Denied.

11. Denied.

II. MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION

(“MCAD”) CHARGE

12. Defendant admits that Plaintiff filed a charge with the MCAD. Defendant is without sufficient information or knowledge to confirm or deny whether the MCAD “then notified” the EEOC.

13. Defendant is without sufficient information or knowledge to confirm or deny whether the EEOC issued Plaintiff with a “Right-to-Sue” notice.

14. Defendant states that Paragraph 14 states a legal conclusion to which no response is required. To the extent a response is required, Defendant is without sufficient information or knowledge to confirm or deny the precise timeframe in which Plaintiff brought her lawsuit or whether “all preconditions for filing this lawsuit have been performed or occurred.”

III. FACTS

15. Defendant is without sufficient information or knowledge to confirm or deny Plaintiff’s age at the time her employment with CHA ended. Defendant admits that Plaintiff was employed by CHA for approximately twenty-eight years. Defendant denies the remaining allegations in Paragraph 15.

16. Denied.

17. Defendant states that Paragraph 17 states a legal conclusion to which no response is required. To the extent a response is required, Defendant denies Plaintiff’s characterization of federal and Massachusetts law, the contents of which speak for itself.

18. Defendant denies Plaintiff's characterization of former Massachusetts Governor Charles Baker's decisions regarding the COVID-19 pandemic, and the results of such decisions.

19. Defendant admits that it implemented a COVID-19 vaccination policy that required employees to receive a COVID-19 vaccine. Defendant denies Plaintiff's characterization of this policy, the contents of which speak for itself.

20. Defendant states that the allegations in Paragraph 20 are not susceptible to admission or denial because they are vague and ambiguous as written. To the extent a response is required, Defendant denies Plaintiff's characterization of former Governor Baker's decisions regarding the COVID-19 pandemic and CHA's COVID-19 vaccination policy.

21. Defendant states that the allegations in Paragraph 21 are not susceptible to admission or denial because they are vague and ambiguous as to the meaning of "Religious Exemption and Accommodation." To the extent a response is required, Defendant admits that Plaintiff applied for a religious accommodation on September 20, 2021.

22. Defendant states that the allegations in Paragraph 22 are not susceptible to admission or denial because they are vague and ambiguous as to the meaning of "protocol" and "Religious Exemption and Accommodation." To the extent a response is required, Defendant admits that Plaintiff applied for a religious accommodation.

23. Defendant states that the allegations in Paragraph 23 are not susceptible to admission or denial because they are vague and ambiguous as to the meaning of "her request" and "Religious Exemption and Accommodation." To the extent a response is required, Defendant denies

Plaintiff's characterization of her religious accommodation request, the contents of which speaks for itself.

24. Defendant states that the allegations in Paragraph 24 are not susceptible to admission or denial because they are based on a quotation from an unidentified document that has not been made available by Plaintiff as an attachment to the First Amended Complaint. To the extent a response is required, Defendant denies Plaintiff's characterization of her religious accommodation request, the contents of which speaks for itself.

25. Defendant states that the allegations in Paragraph 25 are not susceptible to admission or denial because they are based on a quotation from an unidentified document that has not been made available by Plaintiff as an attachment to the First Amended Complaint. To the extent a response is required, Defendant denies Plaintiff's characterization of her religious accommodation request, the contents of which speaks for itself.

26. Defendant states that the allegations in Paragraph 26 are not susceptible to admission or denial because they are based on a quotation from an unidentified document that has not been made available by Plaintiff as an attachment to the First Amended Complaint. To the extent a response is required, Defendant denies Plaintiff's characterization of her religious accommodation request, the contents of which speaks for itself.

27. Defendant states that the allegations in Paragraph 27 are not susceptible to admission or denial because they are vague and ambiguous as to the meaning of "Religious Exemption and Accommodation" and are based on a quotation from an unidentified document that has not been made available by Plaintiff as an attachment to the First Amended Complaint. To the extent a

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