

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IGE ISIJOLA,

Plaintiff;

v.

PHARMACEUTICAL RESEARCH
ASSOCIATES, INC. d/b/a PRA HEALTH
SCIENCES,

Defendant.

JURY DEMANDED

Civil Action

No. _____

COMPLAINT

Plaintiff, Ige Isijola, by and through his undersigned counsel, files this Complaint and avers as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Ige Isijola (“Plaintiff”), is an adult individual residing in Feasterville, Bucks County, Pennsylvania.
2. Upon information and belief, Defendant Pharmaceutical Research Associates, Inc., d/b/a PRA Health Sciences is headquartered in Raleigh, North Carolina, at 4130 Parklake Avenue, Suite 400, Raleigh, North Carolina 27612.
3. At all times material hereto, Plaintiff was employed by Defendant.
4. At all times material hereto, Defendants acted by and through their agents, servants, and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for Defendants.

5. Plaintiff has exhausted his administrative remedies pursuant to the Equal Employment Opportunity Act and the Pennsylvania Human Relations Act. (See Exhibit “A”, a true and correct copy of the “Notice of Rights” issued by the Equal Employment Opportunity Commission.)

6. This action is instituted pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, et seq., (“Title VII”); the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101, et seq.; and the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq. (the “PHRA”).

7. Jurisdiction is conferred by 28 U.S.C. § 1331 and § 1343.

8. Supplemental jurisdiction over Plaintiff’s state law claims is conferred pursuant to 28 U.S.C. § 1367.

9. The venue is properly laid in this district because Defendant conducts business in this district and because a substantial part of the acts and omissions giving rise to the claims set forth herein occurred in this judicial district. 28 U.S.C. §§ 1391(b)(1) and (b)(2).

GENERAL ALLEGATIONS

10. Plaintiff is Nigerian.

11. At all times material hereto, Plaintiff suffered from a medical condition that caused him to bleed when he sits and required a colonoscopy.

12. In or around February 2013, Defendant hired Plaintiff as a Senior Clinical Researcher.

13. At the time of his termination, Plaintiff earned \$110,000 annually.

14. Plaintiff performed his job duties to Defendant’s satisfaction and without any complaint or issue.

15. Plaintiff’s supervisors included Emily Chambers and Kerri Cali.

16. Towards the end of 2018, Plaintiff began experiencing disparate treatment by Ms. Chambers and Ms. Cali, including, without limitation:

- a. Ms. Chambers and Ms. Cali complained to Plaintiff that two of his clients complained about his English, referring to his Nigerian accent;
 - b. Ms. Cali constantly nitpicked Plaintiff's writing. For example, Ms. Cali had already approved a report by a Caucasian co-worker but she had an issue with Plaintiff's identical report;
 - c. Ms. Cali had only negative feedback regarding Plaintiff; and
 - d. Plaintiff began receiving unwarranted write-ups from Ms. Chambers and Ms. Cali regarding his work.
17. Ms. Chambers and Ms. Cali did not treat non-Nigerian and/or non-African-American employees similarly.
18. In the six years leading up to the write-ups, Plaintiff was never told there was an issue with his work and he never received a write-up until there were complaints about his Nigerian accent.
19. Ms. Chambers and Ms. Cali were micromanaging Plaintiff's work because they had a problem with his Nigerian accent and wanted to get rid of him.
20. In or around August of 2019, Plaintiff spoke to Megan Jung, his manager, about needing time off for medical reasons.
21. Plaintiff constantly asked Ms. Jung if she would approve one day off for him to have a medical procedure done.
22. Ms. Jung continuously delayed approving Plaintiff a day off for his medical procedure.
23. On or about November 07, 2019, Defendant terminated Plaintiff.

CAUSES OF ACTION

Count I

Discrimination and Wrongful Termination Based on National Origin in Violation of Title VII

24. By way of reference, Plaintiff repeats and incorporates each and every foregoing paragraph as if fully set forth herein.

25. Plaintiff is Nigerian and, as such, is a member of a class protected by Title VII, i.e. national origin.

26. Plaintiff suffered disparate treatment by his supervisors, which was motivated by Plaintiff's national origin.

27. Plaintiff suffered adverse employment action by way of termination of employment.

28. Defendant's decision to terminate Plaintiff was motivated by his national origin.

29. As such, Defendant's actions are unlawful employment practices under Title VII.

30. As a proximate result of Defendant's conduct, Plaintiff sustained significant damages, including, but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages, and Plaintiff has also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

31. As a result of Defendant's malicious or reckless indifference to Plaintiff's rights, Plaintiff demands punitive damages.

32. Pursuant to Title VII, Plaintiff demands attorneys' fees and costs.

Count II
**Discrimination and Wrongful Termination Based on Disability
in Violation of the ADA**

33. By way of reference, Plaintiff repeats and incorporates each and every foregoing paragraph as if fully set forth herein.

34. At all times material hereto, Plaintiff suffered from a medical condition that caused him to bleed when he sits and required a colonoscopy and, as such, is a member of a class protected by the ADA, i.e. having a disability.

35. Plaintiff suffered adverse employment action by way of termination of employment.

36. Defendant's decision to terminate Plaintiff was motivated by his disability.

37. As such, Defendant's actions are unlawful employment practices under the ADA.

38. As a proximate result of Defendant's conduct, Plaintiff sustained significant damages, including, but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages, and Plaintiff has also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

39. As a result of Defendant's malicious or reckless indifference to Plaintiff's rights, Plaintiff demands liquidated damages.

40. Pursuant to the ADA, Plaintiff demands attorneys' fees and costs.

Count III
**Discrimination and Wrongful Termination Based on National
Origin in Violation of the PHRA**

41. By way of reference, Plaintiff repeats and incorporates each and every foregoing paragraph as if fully set forth herein.

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