

19<sup>TH</sup> JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE  
STATE OF LOUISIANA

NUMBER: 596,387 SECTION "22"

ELLEN WYDRA

V.

STATE OF LOUISIANA THROUGH LOUISIANA  
EDUCATIONAL TELEVISION AUTHORITY

\*\*\*\*\*  
PLAINTIFF'S SECOND SUPPLEMENTAL AND AMENDING PETITION

The Second Supplemental and Amending Petition of Plaintiff, Ellen Wydra, with amendments and supplements noted in bold print hereinafter, respectfully represents:

I.

Plaintiff supplements and amends her Petition, as supplemented and amended, by adding, as paragraph 13a, the following:

13a.

Since the filing of this lawsuit, Petitioner has continued to be subjected to harassment, discrimination and retaliation consisting of the following continuing and escalated acts constituting disability-based harassment and retaliation:

1. On or about October 31, 2016, Defendant, through Beth Courtney, openly and negatively discussed this pending lawsuit with Petitioner in the workplace. Courtney repeatedly harassed Petitioner about whether she was going to settle this lawsuit or retire. Courtney told Petitioner that she did not know what to put in the agency's budget, because she did not know whether Petitioner was going to "accept the state's settlement response or retire or what". Courtney further told Petitioner that Petitioner's salary would go a long way to cover the budget cuts, and if Petitioner did not leave her employment, Courtney would have to reorganize and possibly lay off people;

2. Defendant, through Beth Courtney, told Petitioner that she (Courtney) was not good with the trial being set in September, 2017 and that it was "unheard of for this to go on that long . . . usually people are fired and then they file a lawsuit . . . I don't want this to go longer";

3. Defendant, through Beth Courtney, repeatedly pressured Petitioner to make a decision on whether she was going to retire, resolve the lawsuit, and/or to file for Social

EBR3988024

Security retirement. Courtney further repeatedly told Petitioner that she needed to know if Petitioner was planning to settle, retire, or leave so that she could prepare the agency's budget;

4. Defendant, through Beth Courtney, refused to conduct Petitioner's performance evaluation or planning session for 2016;

5. Throughout November and December of 2016, Beth Courtney continued to repeatedly exclude Petitioner from meetings and withhold information involving the early childhood contract workers despite the fact that Petitioner is the designee to supervise and monitor the early childhood contract workers in Petitioner's department. Further, Courtney reduced and diminished Petitioner's responsibilities and supervision of the early childhood staff; and,

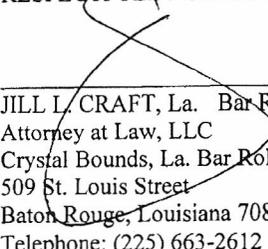
6. On January 19, 2017, Petitioner was notified that Courtney had replaced her as the contract monitor and supervisor for the early childhood educators in her department, thus reducing the staff supervised by Petitioner to only one person and substantially modifying and further restricting Petitioner's job duties because Petitioner did not settle, retire, or leave as Courtney had repeatedly ordered her to do and in retaliation for Petitioner's protected activities including the filing of this lawsuit and opposing unlawful discrimination, retaliation, and harassment in her working environment.

## II.

Petitioner reiterates and realleges all allegations contained her original Petition and her (First) Supplemental and Amending Petition as if quoted herein entirely and specifically including her request for trial by jury.

WHEREFORE, Plaintiff, Ellen Wydra, prays for trial by jury and after due proceedings are had that there be judgment herein in her favor and against defendant, State of Louisiana, through Louisiana Educational Television Authority, for all sums as are reasonable under the premises, attorney's fees, all costs of these proceedings, legal interest thereon from the date of judicial demand until paid, and all such other relief to which she is entitled at law or in equity.

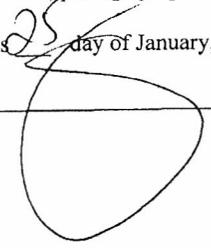
RESPECTFULLY SUBMITTED

  
 \_\_\_\_\_  
 JILL I. CRAFT, La. Bar Roll No. 20922  
 Attorney at Law, LLC  
 Crystal Bounds, La. Bar Roll No. 27490  
 509 St. Louis Street  
 Baton Rouge, Louisiana 70802  
 Telephone: (225) 663-2612  
 Fax: (225) 663-2613

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25 day of January, 2017, I have served a copy of the above and foregoing Second Supplemental and Amending Petition on all counsel of record via First Class United States Mail, postage prepaid.

Baton Rouge, Louisiana, this 25 day of January, 2017.

  
 \_\_\_\_\_

FILED  
EAST BATON ROUGE PARISH

2017 JAN 25 PM 2:36

  
 DEPUTY CLERK OF COURT