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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF ARIZONA

11 EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION,)

13 Plaintiff,)

14 vs.)

15 TEMPLE-INLAND INC., d/b/a INLAND)
16 PAPERBOARD & PACKAGING, a)
Delaware corporation,)

17 Defendant.)
_____)

CIV

COMPLAINT

(Jury Trial Demanded)

18
19 NATURE OF THE ACTION

20 This is an action under the Age Discrimination in Employment Act to correct
21 unlawful employment practices on the basis of age and to provide appropriate relief to
22 David C. Neal and a class of individuals, age 40 or older, whom Defendant terminated
23 because of their age. The Equal Employment Opportunity Commission (“Plaintiff” or
24 “Commission”) alleges that Defendant, Temple Inland Inc., d/b/a Inland Paperboard &
25 Packaging, (“Defendant”), terminated Mr. Neal, who was then age 56, from his job as
26 Plant Manager because of his age. The Commission also alleges Defendant terminated a
27 class of employees who are at least 40 years of age because of their age.
28

1 and which eradicate the effects of its past and present unlawful employment practices.

2 C. Grant a judgment requiring Defendant to pay appropriate back wages in an
3 amount to be determined at trial, an equal sum as liquidated damages, and prejudgment
4 interest to individuals whose wages are being unlawfully withheld as a result of the acts
5 complained of above, including but not limited to Mr. Neal and a class of individuals who
6 are 40 years old or older who were adversely affected by the unlawful practices described
7 above.

8 D. Order Defendant to make whole all individuals adversely affected by the
9 unlawful practices described above, by providing the affirmative relief necessary to
10 eradicate the effects of its unlawful practices, including but not limited to rightful - place
11 reinstatement of Mr. Neal and a class of protected age group employees or, alternatively,
12 front pay.

13 E. Grant such further relief as the Court deems necessary and proper in the public
14 interest.

15 F. Award the Commission its costs of this action.

16 JURY TRIAL DEMAND

17 The Commission requests a jury trial on all questions of fact raised by its
18 Complaint.

19 DATED this 2nd day of August, 2006.

20 Respectfully submitted,

21 JAMES L. LEE
22 Deputy General Counsel

23 GWENDOLYN YOUNG REAMS
24 Associate General Counsel

25 EQUAL EMPLOYMENT
26 OPPORTUNITY COMMISSION
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s/Mary Jo O'Neill
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