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Electronically
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By /s/ Owen Tapang
Deputy Clerk

ATTORNEYS FOR PLAINTIFF
OFA TAIMANI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN MATEO
UNLIMITED JURISDICTION

OFA TAIMANI,

Plaintiff,

v.

SEQUOIA UNION HIGH SCHOOL
DISTRICT; CRYSTAL LEACH; TODD BEAL;
BONNIE HANSEN; EMILY RIGOTTI; KARL
LOSEKOOT; and DOES 1-100 inclusive,

Defendants.

CASE NO. 26-CIV-03191

COMPLAINT FOR DAMAGES

**1st Cause of Action: Race Discrimination (Gov.
Code §12940(a))**

**2nd Cause of Action: Retaliation (Gov. Code
§12940(h))**

JURY TRIAL DEMANDED

Plaintiff OFA TAIMANI, hereby alleges against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100 inclusive, and each of them as follows:

SUMMARY OF COMPLAINT

1. Plaintiff OFA TAIMANI was discriminated against by Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100 inclusive, (“Defendants”) and each of them, due to her national origin and in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

1 SUHSD; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL
2 LOSEKOOT; and DOES 1-100 inclusive, and each of them, were the proximate cause of the injuries and
3 losses suffered by Plaintiff.

4 9. Defendant CRYSTAL LEACH is an individual who, upon information and belief, is and
5 was a resident of the state of California at all times relevant to this Complaint. Defendant CRYSTAL
6 LEACH is the Superintendent at SUHSD and served in this capacity during the time of the incidents
7 giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant
8 CRYSTAL LEACH is, and at all times relevant to this action has been an employee of SUHSD.

9 10. Defendant TODD BEAL is an individual who, upon information and belief, is and was a
10 resident of the state of California at all times relevant to this Complaint. Defendant TODD BEAL was the
11 Assistant Superintendent at SUHSD and served in this capacity during the time of the incidents giving rise
12 to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant TODD BEAL
13 is, and at all times relevant to this action has been an employee of SUHSD. Plaintiff OFA TAIMANI is
14 informed and believes that Defendant TODD BEAL has since resigned from his position at SUHSD.

15 11. Defendant BONNIE HANSEN is an individual who, upon information and belief, is and
16 was a resident of the state of California at all times relevant to this Complaint. Defendant BONNIE
17 HANSEN is now the Assistant Superintendent at SUHSD and served in this capacity during the time of
18 the incidents giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that
19 Defendant BONNIE HANSEN is, and at all times relevant to this action has been an employee of
20 SUHSD.

21 12. Defendant EMILY RIGOTTI is an individual who, upon information and belief, is and
22 was a resident of the state of California at all times relevant to this Complaint. Defendant EMILY
23 RIGOTTI is now the Instructional Vice-Principal at SUHSD and served in this capacity during the time of
24 the incidents giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that
25 Defendant EMILY RIGOTTI is, and at all times relevant to this action has been an employee of SUHSD.

26 13. Defendant KARL LOSEKOOT is an individual who, upon information and belief, is and
27 was a resident of the state of California at all times relevant to this Complaint. Defendant KARL
28 LOSEKOOT is now the Principal at SUHSD and served in this capacity during the time of the incidents

1 giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant
2 KARL LOSEKOOT is, and at all times relevant to this action has been an employee of SUHSD.

3 14. This Complaint encompasses a series of events wherein Defendants SUHSD; CRYSTAL
4 LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-
5 100 inclusive, and each of them, acted or failed to act, in a retaliatory and discriminatory manner towards
6 Plaintiff OFA TAIMANI causing injuries and losses suffered by Plaintiff.

7 15. The true names and capacities, whether individual, corporate, partnership, joint venture,
8 franchisee or otherwise of Defendants DOES 1-100, inclusive, are unknown to Plaintiff who sues these
9 Defendants by fictitious names.

10 16. Each of the Defendants named in this Complaint as a DOE is legally responsible in some
11 manner for the events and happenings alleged in this Complaint, and legally caused injury and damage to
12 Plaintiff as alleged in this Complaint.

13 17. At all times mentioned in this Complaint, Defendants, and each of them, were the agents
14 and employees of the remaining Defendants and were at all times acting within the course and scope of
15 that agency and employment.

16 18. Plaintiff is informed, believes and therefore alleges that at all times mentioned herein,
17 certain of the Defendant DOES are the successors in interest to each of the remaining Defendants and on
18 that basis, are liable for any act or omission of Defendants alleged in this Complaint.

19 19. Venue is proper in this County because the incident giving rise to this Complaint occurred
20 in this County.

21 **EVENTS GIVING RISE TO THIS COMPLAINT**

22 20. Defendant SUHSD has unlawfully discriminated and retaliated against Plaintiff OFA
23 TAIMANI's, an employee of Defendant SUHSD, protected conduct based upon the investigation of
24 vague, purported allegations of misconduct, in violation of the Educational Employment Relations Act,
25 Government Code section 3540 et seq., ("the Act").

26 21. In the Spring of 2023, it became public that a Menlo-Atherton administrator(s) had
27 released a student's special education file to the Atherton Police Department without parental consent.

28 22. During the time period of the alleged release, Plaintiff OFA TAIMANI was on maternity

1 leave that was both medically required and approved by SUHSD. Also, during this time period, numerous
2 minority teachers and employees made Sequoia Union High School District administrators aware of
3 discriminatory practices and retaliatory acts by the named defendants. All complaints against Caucasian
4 administrators were submitted as a uniform complaint. None were fairly investigated, nor were any white
5 Caucasian administrators given any discipline.

6 23. In or around November 2023 and upon Plaintiff OFA TAIMANI's return to work from
7 maternity leave, Defendant TODD BEAL requested a meeting with Plaintiff OFA TAIMANI. At the
8 time, Plaintiff OFA TAIMANI was unaware of any complaint filed against her. Plaintiff OFA TAIMANI
9 understandably requested information as to the purpose of the meeting and Defendant TODD BEAL
10 would not provide any information. Defendant TODD BEAL threatened Plaintiff OFA TAIMANI with
11 disciplinary action if she did not attend.

12 24. Plaintiff OFA TAIMANI requested that the meeting be rescheduled to allow her time to
13 prepare and obtain union representation. This request was denied, effectively depriving her of union
14 representation and due process rights under the Act.

15 25. Defendant TODD BEAL compelled Plaintiff OFA TAIMANI to meet with him and she
16 was, for the first-time, put-on notice that she was being accused of the following:

- 17 • Failing to follow school procedures for allowing a visitor onto campus and into to the
18 assistant principals' office where the visitor illegally took pictures of the office area;
- 19 • Providing confidential special education student information to an individual(s) without
20 parent or school administration consent;

21 26. Following this meeting, Plaintiff OFA TAIMANI believed she was having a heart attack at
22 her desk. Defendant EMILY RIGOTTI walked into the administration office and saw that Plaintiff OFA
23 TAIMANI was not well. Plaintiff OFA TAIMANI explained to Defendant EMILY RIGOTTI that she
24 was having difficulty breathing and that Defendant TODD BEAL caused her emotional distress due to
25 him compelling her to meet with him and accusing her of mishandling students' special educational files.
26 Defendant EMILY RIGOTTI attempted to engage Plaintiff OFA TAIMANI about the investigation, but
27 Plaintiff OFA TAIMANI's condition started to deteriorate and she was forced to leave work. Plaintiff
28 OFA TAIMANI filed a Workers' Compensation claim and sought treatment.

1 27. Due to the harassing, discriminatory and retaliatory actions of the Defendants, Plaintiff
2 OFA TAIMANI went out on medical leave due to a stress claim. The Workers' Compensation claim filed
3 by Plaintiff OFA TAIMANI is still pending, but a Qualified Medical Evaluator opined that her medical
4 condition is industrially related. In other words, her medical condition was caused by the Defendants'
5 harassing, retaliatory and discriminatory conduct toward Plaintiff OFA TAIMANI.

6 28. In or around December 2023, Plaintiff OFA TAIMANI filed a complaint of retaliation,
7 discrimination, and harassment against Defendant TODD BEAL.

8 29. It should be noted that SUHSD Regulation/Policy 1312.1 indicates that if a complainant is
9 unable to prepare a uniform complaint in writing, administrative staff shall provide assistance in the
10 preparation of the complaint. Despite Plaintiff OFA TAIMANI's request for assistance, Defendant
11 TODD BEAL did not provide assistance in preparation of the complaint and therefore was in violation of
12 SUHSD Regulation/Policy 1312.1.

13 30. In or around April 2024, upon Plaintiff OFA TAIMANI returning to work from medical
14 leave, Defendant KARL LOSEKOOT sent Plaintiff OFA TAIMANI an email stating there would be
15 changes in the administration office and she would be assigned new duties. Plaintiff OFA TAIMANI
16 discovered her job duties had been significantly altered and she was being forced to work in that new role
17 without any requisite training. Plaintiff OFA TAIMANI was also evicted from her workstation by another
18 employee, who had been assigned the job duties in which Plaintiff OFA TAIMANI had done for the last
19 four years and had the same job title as Plaintiff OFA TAIMANI.

20 31. On or around May 1, 2024, Plaintiff OFA TAIMANI attended a meeting with Mr. Abdul
21 Johnson (Union Business Agent), Mr. Mike Molieri, Defendant KARL LOSEKOOT and Defendant
22 EMILY RIGOTTI regarding Plaintiff OFA TAIMANI's altered position and job duties. During this
23 meeting, which was audio-recorded, Defendant KARL LOSEKOOT alleged that he had not ignored any
24 of the complaints of discrimination, retaliation or harassment filed against other Caucasian SUHSD staff
25 and administrators. Plaintiff OFA TAIMANI inquired about her own complaint and identified other
26 situations where staff minorities submitted written complaints against Caucasian staff and administrators,
27 but those complaints were never investigated.

28 32. Soon thereafter, in or around May of 2024, Plaintiff OFA TAIMANI's supervisor,

1 Defendant EMILY RIGOTTI completed an employee evaluation accusing Plaintiff OFA TAIMANI of
2 two incidents during the 2023-2024 school year. Plaintiff OFA TAIMANI contends these accusations
3 were false and unsupported by evidence, and Defendant EMILY RIGOTTI refused to amend the
4 evaluation.

5 33. In or around the Spring of 2024, Plaintiff OFA TAIMANI's complaint, dated November
6 of 2023, was assigned to Human Resources Director Freedom Siyam ("Siyam"), who reports directly to
7 Defendant TODD BEAL. Plaintiff OFA TAIMANI raised concerns of bias in writing to Superintendent
8 Defendant CRYSTAL LEACH, who took no action.

9 34. In or around of May 2024, Siyam's investigative findings related to Plaintiff OFA
10 TAIMANI's November 28, 2023 complaint did not include the fact that Defendant TODD BEAL had
11 violated regulation 1312.1 and that no written complaint was ever received or written out, nor any
12 documentary evidence was ever gathered.

13 35. On June 6, 2024 Defendant TODD BEAL sent Plaintiff OFA TAIMANI his investigation
14 findings into Plaintiff OFA TAIMANI for (1) Failing to follow school procedures for allowing a visitor
15 onto campus and into to the assistant principals' office where the visitor illegally took pictures of the office
16 area; and (2) Providing confidential special education student information to an individual(s) without
17 parent or school administration consent. Defendant TODD BEAL did not sustain the first allegation and
18 partially sustained the second allegation. He concluded, in corroboration with Defendant EMILY
19 RIGOTTI and based on no documentary evidence, that she improperly asked Defendant EMILY
20 RIGOTTI for the confidential information. A disputed conclusion. However, Defendant TODD BEAL
21 did not sustain the allegation that she provided the confidential special education student information to
22 an individual(s) without parent or school administration consent.

23 36. In conjunction with Defendant TODD BEAL's June 6, 2024 written investigation
24 findings, he also provided Plaintiff OFA TAIMANI with a copy of the SUHSD Regulation/Policy 1312.1.
25 Plaintiff OFA OFA TAIMANI attempted to exercise her rights under SUHSD Regulation/Policy 1312.1
26 by demanding copies of the complaint that was filed against her. These requests were repeatedly ignored.

27 37. Plaintiff OFA TAIMANI sent numerous emails to Defendant CRYSTAL LEACH and the
28 SUHSD Board of Trustees asking for a copy of the complaint in which Defendant TODD BEAL

1 produced an investigation finding that Plaintiff OFA TAIMANI had not received the written complaint.
2 Plaintiff OFA TAIMANI also requested to appeal the investigation findings of Defendant TODD BEAL.
3 It was not until August 12, 2024, that it was confirmed by Ms. Laura Lauese, assistant to superintendent
4 and board of trustees, that no written complaint was filed or produced.

5 38. In or around June 2024, Defendant EMILY RIGOTTI and Plaintiff OFA TAIMANI met
6 and went on a walk around the Menlo-Atherton High School campus. Defendant EMILY RIGOTTI
7 admitted to Plaintiff OFA TAIMANI that the verbal complaint was false and that subsequent changes in
8 Plaintiff OFA TAIMANI's job duties were retaliatory.

9 39. In or around July 2024, Plaintiff OFA TAIMANI received an email from Ms. Rebecca
10 Hays to sign a "Classified Evaluation." Plaintiff OFA TAIMANI responded in email to Ms. Hays and
11 copied Defendant EMILY RIGOTTI about updating the evaluation. Defendant EMILY RIGOTTI
12 confirmed, responded, and asked Plaintiff OFA TAIMANI to send the form back to her. The evaluation
13 form was never updated. This was the first time ever that Plaintiff OFA TAIMANI was subjected to this
14 type of treatment.

15 40. In or around August 2024, after summer break, Defendants continued to harass, retaliate
16 and discriminate against Plaintiff OFA TAIMANI, increasing her duties without training. Despite repeated
17 requests, neither Defendant EMILY RIGOTTI nor Defendant SUHSD provided training to Plaintiff
18 OFA TAIMANI.

19 41. These actions were to harass and retaliate against Plaintiff OFA TAIMANI for filing a
20 uniform complaint of discrimination and retaliation. Throughout this time frame, Plaintiff OFA
21 TAIMANI, as well as other individuals in SUHSD, have consistently complained and reported
22 discriminatory practices within the SUHSD.

23 42. It is alleged and believed that Caucasian(s) SUHSD administrators and/or instructors were
24 responsible for providing confidential special education student information to an individual(s) without
25 parent or school administration consent. However, none of those individuals, including possibly the
26 Defendants, were investigated.

27 43. In September 2024, Plaintiff OFA TAIMANI was forced to again take medical leave from
28 work due to the stress caused by the ongoing harassment, retaliation and discrimination.

1 44. In or around September 2024, Plaintiff OFA TAIMANI also filed a complaint of
2 retaliation and harassment against Defendant CRYSTAL LEACH, Defendant TODD BEAL, Defendant
3 BONNIE HANSEN, and Defendant KARL LOSEKOOT. Defendant SUHSD failed to address her
4 complaint.

5 45. In or around March 2025, Defendant SUHSD constructively terminated Plaintiff OFA
6 TAIMANI's employment while still on medical leave.

7 46. Defendant SUHSD's adverse action was unlawfully motivated as demonstrated by, but not
8 limited to, the following:

- 9 • Defendants' refusal to reschedule the meeting with Defendant TODD BEAL and
10 threatening Plaintiff with disciplinary action;
- 11 • Depriving Plaintiff of her afforded union representation at the meeting with Defendant
12 TODD BEAL;
- 13 • The close temporal proximity between the time when Plaintiff OFA TAIMANI made her
14 complaint in December 2023 and the subsequent actions taken by Defendants;
- 15 • In April 2024, Defendant SUHSD increased Plaintiff's job duties significantly, and without
16 training, while she was on approved medical leave after Plaintiff had filed her complaint;
- 17 • 2023-2024 school year Employee evaluations containing false accusations unsupported by
18 evidence;
- 19 • Assigning Human Resources Director Freedom Siyam, who reports directly to Defendant
20 TODD BEAL, to investigate the complaint made by Plaintiff against Defendant TODD
21 BEAL;
- 22 • Failing to take any action when Plaintiff raised concerns of bias in writing to
23 Superintendent Defendant CRYSTAL LEACH regarding the investigation being
24 conducted by Human Resources Director Freedom Siyam who reports to Defendant
25 TODD BEAL which created a conflict of interest;
- 26 • In August 2024, Defendant SUHSD again increased Plaintiff OFA TAIMANI's job duties
27 significantly, and without training;
- 28 • Continually refusing to provide training requested by Plaintiff OFA TAIMANI for her
29 increased job duties;
- 30 • Caucasian(s) SUHSD administrators and/or instructors who were potentially responsible
31 for providing confidential special education student information to an individual(s) without
32 parent or school administration consent were never investigated.

33 47. It is clear that the actions of Defendant SUHSD were done in retaliation for Plaintiff OFA
34 TAIMANI filing complaints against Defendants and are discriminatory based on the differential treatment

1 of other employees of Defendant SUHSD that are not of the same ethnic descent.

2 48. Defendants' acts and omissions alleged above constitute unlawful discrimination and
3 retaliation in violation of the Act.

4 49. The discriminatory and retaliatory conduct by Defendants SUHSD; CRYSTAL LEACH;
5 TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100 toward
6 Plaintiff OFA TAIMANI has caused significant damage to Plaintiff OFA TAIMANI's reputation and has
7 destroyed her credibility.

8 50. As a result of the discriminatory and retaliatory actions of Defendants SUHSD; CRYSTAL
9 LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-
10 100 inclusive, and each of them, Plaintiff OFA TAIMANI suffered economic and non-economic damages
11 in an amount to be proven at trial.

12 **COMPLIANCE WITH CLAIMS PRESENTATION REQUIREMENTS**

13 51. Plaintiff OFA TAIMANI has satisfied all claims presentation requirements of the
14 Government Claims Act prior to filing this complaint. Plaintiff presented her claims to the government
15 entity named in this complaint on September 2, 2025. Plaintiff's claims were rejected on October 27, 2025
16 by the government entity named herein by operation of law and were not rejected on the grounds that the
17 claims were untimely. Plaintiff has filed this complaint within less than six months since the date of
18 rejection.

19 **FIRST CAUSE OF ACTION – RACE DISCRIMINATION**

20 **(Violation of FEHA, Gov. Code §12940(a))**

21 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
22 TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100
23 inclusive)**

24 52. Plaintiff OFA TAIMANI incorporates by reference paragraphs 1-51 above as though fully
25 set forth herein.

26 53. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT is an employer subject to
27 suit under the FEHA which provides, in pertinent part, that it is unlawful for “an employer, because of
28 the... race... of any person, to... discriminate against the person... in terms, conditions, or privileges of
employment.” (Gov. Code §12940(a))

54. Plaintiff OFA TAIMANI, who is Pacific Islander and her national origin is Tongan, was

1 an employee of Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT as a School Secretary and
2 assistant Menlo-Atheron High School Basketball Coach, and was a permanent, tenured employee.

3 55. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
4 TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100
5 inclusive, and each of them, made numerous decisions referenced herein which subjected Plaintiff OFA
6 TAIMANI to adverse employment actions and altered her terms and conditions of employment. Plaintiff
7 OFA TAIMANI's race was a substantial motivating reason for these decisions, evidenced by numerous
8 other complaints of discrimination, retaliation or harassment that were filed against Caucasian SUHSD
9 staff and administrators which were ignored or never investigated by Defendants.

10 56. As a direct and legal result of Defendants' actions as aforesaid, Plaintiff OFA TAIMANI
11 has suffered and will suffer economic and non-economic damages in an unascertained amount that
12 exceed the minimum jurisdiction of this Court.

13 57. As a further direct and legal result of Defendants' actions as aforesaid, Plaintiff OFA
14 TAIMANI has been, and may continue to be, unable to work due to the events described in this
15 Complaint and, accordingly, has suffered lost wages and will continue to suffer loss of earnings in an
16 amount presently unknown, but with special damages exceeding the minimum jurisdiction of this Court.

17 Wherefore, Plaintiff OFA TAIMANI prays for judgment against Defendants SEQUOIA
18 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN;
19 EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100 inclusive, as set forth below.

20 **SECOND CAUSE OF ACTION – RETALIATION**

21 **(Violation of FEHA, Gov. Code §12940(h))**

22 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100
inclusive)**

23 58. Plaintiff OFA TAIMANI incorporates by reference paragraphs 1-57 above as though fully
24 set forth herein.

25 59. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT is an employer subject to
26 suit under the FEHA which provides, in pertinent part, that it is unlawful for an employer to retaliate
27 against its employees for engaging in protected conduct. (Gov. Code §12940(h))

28 60. Plaintiff OFA TAIMANI was an employee of Defendant SEQUOIA UNION HIGH

1 SCHOOL DISTRICT as a School Secretary who engaged in protected activities which include, but are not
2 limited to, filing official complaints against employees of Defendant SEQUOIA UNION HIGH
3 SCHOOL DISTRICT due to their actions.

4 61. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
5 TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-100
6 inclusive, and each of them, made numerous decisions referenced herein which subjected Plaintiff OFA
7 TAIMANI to adverse employment actions and altered her terms and conditions of employment. Plaintiff
8 OFA TAIMANI's engagement in protected conduct, was a substantial motivating reason for these
9 decisions.

10 62. As a direct and legal result of Defendants' actions as aforesaid, Plaintiff OFA TAIMANI
11 has suffered and will suffer economic and non-economic damages in an unascertained amount that
12 exceed the minimum jurisdiction of this Court.

13 63. As a further direct and legal result of Defendants' actions as aforesaid, Plaintiff OFA
14 TAIMANI has been, and may continue to be, unable to work due to the events described in this
15 Complaint and, accordingly, has suffered lost wages and will continue to suffer loss of earnings in an
16 amount presently unknown, but with special damages exceeding the minimum jurisdiction of this Court.

17 Wherefore, Plaintiff OFA TAIMANI prays for judgment against Defendants SEQUOIA UNION
18 HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; EMILY
19 RIGOTTI; KARL LOSEKOOT; and DOES 1-100 inclusive, as set forth below.

20 **PRAYER**

21 WHEREFORE, with respect to each cause of action listed above, Plaintiff OFA TAIMANI
22 prays for damages against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL
23 LEACH; TODD BEAL; BONNIE HANSEN; EMILY RIGOTTI; KARL LOSEKOOT; and DOES 1-
24 100 inclusive, and each of them, as follows:

- 25 1. General Damages in an amount to be determined by proof at trial;
- 26 2. Special damages in an amount to be determined by proof at trial;
- 27 3. Reasonable attorneys' fees and costs as permitted by law;
- 28 4. Interest as permitted by law;

