

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**MONA GRISWOLD, individually and on  
behalf of others similarly situated,**

**Plaintiff,**

**v.**

**WESTROCK COMPANY**

**Defendant.**

**Civil Action No:** \_\_\_\_\_

**CLASS ACTION AND INDIVIDUAL COMPLAINT**

COMES NOW Plaintiff Mona Griswold, by counsel, and states the following as her Complaint against Defendant WestRock Company:

**PRELIMINARY STATEMENT AND  
NATURE OF THE ACTION**

1. This action challenges a pattern of discriminatory employment practices by WestRock Company, and its predecessor organizations, which were intended to implement, and/or had the effect of implementing, a ‘glass ceiling’ for female employees and applicants in the terms, conditions and privileges of employment and prospective employment as compared to male employees and applicants.

2. Plaintiff, Mona Griswold, is a 63 year old female former employee of WestRock Company and its predecessor MeadWestvaco (“WestRock”). She is a forester with Masters Degrees in Forestry and Business Administration (MBA) and 40 years of industry experience in wood procurement, land management, related technology, certification, strategic planning,

sustainable forestry and sawmill operations. Prior to its merger with RockTenn, she worked with MeadWestvaco/WestRock for 9 years until notified of the termination of her WestRock employment on November 3, 2015, effective immediately. Lesser or no better qualified male foresters were retained in positions for which Plaintiff was qualified.

3. During Plaintiff's employment, she suffered selective gender-based treatment and the ongoing adverse gender based impact of policies and practices regarding compensation, employment opportunities, and other terms and conditions of her employment, including her selection for termination as ongoing gender discrimination and/or in retaliation for opposition to WestRock's practices with respect to advancement in position and pay.

4. After her termination, Plaintiff applied for a position as an external candidate for which she was qualified, but was not hired for the position. WestRock falsely stated that a better candidate had been selected who lived near the mill. On information and belief, this was a male candidate who rejected an offer of employment. The position remained posted for months. WestRock removed the posting after Plaintiff filed the EEOC Charge identifying the incongruence in WestRock's stated reason for the failure to interview or hire and the continued posting.

5. WestRock's stated reason for failing to consider Plaintiff for the position was a pretext for gender based hiring discrimination, which Plaintiff asserts is an on-going pattern and practice and continuing violation of federal employment laws.

6. The class claims stated in this Complaint arise out of the illegal pattern of gender based discrimination, pursuant to Rule 23 class claims for gender based hiring discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e *et seq.*, as amended, including the Lilly Ledbetter Fair Pay Act of 2009 ("Title VII"). The Complaint seeks

declaratory relief, injunctive relief and damages under Title VII. Plaintiff Griswold files this action as a class representative for female applicants for forestry positions who were not hired.

7. Plaintiff additionally states individual claims for violations of Title VII and for retaliation after she opposed her selective treatment.

### **JURISDICTION AND VENUE**

8. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343 and 42 U.S.C. § 2000(e)-(5)(f). The declaratory and injunctive relief sought is authorized by 28 U.S.C. §§ 2201 and 2202, 42 U.S.C. § 2000e, *et seq.* and Rule 57 of the Federal Rules of Civil Procedure.

9. Venue is proper in this District under 28 U.S.C. § 1391(b) and (e) and 42 U.S.C. § 2000(e)-(5)(f)(3) as the actions and unlawful employment practices alleged herein were committed in the Eastern District of Virginia.

10. Plaintiff has exhausted all required administrative procedures for the filing of her Title VII and ADEA actions, having filed a timely formal class based complaint with the Equal Employment Opportunity Commission on or about March 7, 2016, which was amended on or about April 7, 2017. The EEOC issued a Notice of Right to Sue on September 12, 2017. Suit has been brought within 90 days of plaintiff's receipt of the Notice of Right to Sue, consistent with Title VII.

### **PARTIES**

11. Plaintiff, Mona Griswold, is a citizen of the State of Washington, formerly of Charlottesville, Virginia.

12. Plaintiff is a proper class representative for the proposed Rule 23 applicant class.

13. Defendant, WestRock, is an employer within the definitions of Title VII to the 1964 Civil Rights Act. WestRock, and its predecessor entities, have employed in excess of 500 employees and have done so at all times pertinent to this action.

## **FACTS**

### **WestRock's History of Preferences to Male Applicants and Employees**

14. WestRock is an international packaging company with 42,000 employees in 30 countries, with operating offices in Norcross, Georgia and executive offices in Richmond, Virginia. During times pertinent hereto, it operated some 31 mills internationally and listed 16 mill operations (and an additional Canadian mill) in its Forest Resources division (denoted the Operations division under MeadWestvaco). Each mill had its own timber acquisition, management and certification operations – with attendant forester positions, whether titled “forester,” “fiber supply,” “fiber certification,” “acquisition,” “procurement,” “sustainability,” “harvest,” “fuel fiber,” “timber/wood” or various analyst position titles.

15. WestRock has maintained a heavily male workforce in its Forestry Resources division.

16. WestRock and its predecessors have hired males disproportionately to the available new graduate and general labor pool. By way of example, the U.S. Department of Labor Bureau of Labor Statistics reports that for 2016, of 58,000 forestry employees nationally (excluding logging), 21% were female. Census data reveals that 29.4% of graduating classes in Forestry majors are female.

17. Very few female foresters have been hired into WestRock's Forest Resources divisions (or MeadWestvaco's Operations divisions) to fill available positions. Indeed, of some

100 Forest Resources (Operation) employees, less than a handful of women were hired into forester or wood procurement positions.

18. On information and belief, WestRock has not provided female applicants or employees similar opportunities as have been provided male applicants and employees and, for the few females hired, has created artificial 'glass ceiling' bars to the level of advancement and compensation provided to male employees.

19. By way of example, Plaintiff is aware of a married couple who previously worked in the Community Development Land Management (CDLM) division of MeadWestvaco. The woman had two Masters Degrees but, in 35 years of employment, her salary grade was only increased once, to a grade 14. She believed that her male peer was paid more, but discussing salary was expressly forbidden by the company. Her peer was also provided a company truck she was not provided. The woman's husband, who also worked in the division, had a 2 year Associates degree. MeadWestvaco (and its predecessor Westvaco) assisted him to get his 4 year degree, after which he was promoted and left the company in 2013 when the division was sold.

20. Given the pattern of Defendant's pay practices, Plaintiff asserts that the husband's pay grade and position in pay grade were more than his wife's, based on gender. Until protected by this Court and legal process, witnesses have been reluctant to discuss salaries paid at MeadWestvaco and WestRock.

21. During Plaintiff's employment, she was repeatedly passed over for positions for which she was qualified, compared to male employees of like, or lesser, experience and qualification. Her salary was likewise depressed compared to her male Forest Resources peers, the result of a discriminatory system of compensation which negatively affected the compensation of female foresters.

**Plaintiff's Depressed Pay and Position Progression at WestRock Compared to Male Employees**

22. WestRock has engaged in both selective treatment and disparate impact discrimination for compensation determinations and promotional opportunities, selectively applying policies and practices favoring male employees/applicants in compensation determinations, posting of positions, pre-selecting male candidates for positions, self-selecting males for positions not subject to jeopardy in reorganization, circumventing position-posting policies, and employing subjective factors favoring male candidates over qualified female candidates.

23. Plaintiff was based in Charlottesville, Virginia as a CFM Forester from 2006 through 2012 and served as Certification Lead from 2012 until her November 3, 2015 termination. At all times up to and including the date of her termination, Griswold consistently performed within, or exceeded, WestRock's objective performance measures.

24. Plaintiff's qualifications should be unquestioned. She holds a Bachelor's Degree in Botany, a Masters' Degree in Forestry and an MBA. Her career experience includes 24 years of experience in forestry leadership roles (overseeing procurement and land management) with budget responsibilities up to \$40 million, 20 years in procurement roles, 13 years managing all aspects of company owned ("fee") land, 12 years as a forester developing management plans and collaborating with private landowners to achieve their desired land management and procurement objectives, 9 years of creating geographic information systems (GIS) maps (including 3 years working with a cloud based geospatial database) and 6 years of analytical and technical forestry roles (business analysis, strategic planning and capital planning).

25. As Forester/Certification Lead, she led efforts to increase fiber deliveries from certified sources to the paper mill, and was responsible for policies, training of Region personnel

in internal and external audit functions. She conceived of and executed an innovative method for streamlining group certification for private landowners that the company is still using.

26. The timber industry, generally, has not been welcoming to females in forestry field positions. Plaintiff has suffered numerous gender-based indignities as she gained experience in the field, before coming to MeadWestvaco. But she did not complain or seek legal relief. She put her head down, did her job to get by. She worked hard and was successful.

27. At MeadWestvaco/WestRock, Plaintiff was the only female forester in the Covington Mill region where she worked from 2006 to 2015. Being the only female, she often faced challenges beyond obstacles to equitable pay and promotional opportunities. Travel to the WestRock Appomattox office was required regularly. There are four individual bathrooms in the office, two Men's rooms and two Women's rooms. Prior to her termination, when she went there for work reasons, she found that men were using all four restrooms – one Women's restroom had been taped over with a sign "Men" and the "Women" sign had been removed from the other.





28. Despite recognition of her excellent performance and qualifications, she met resistance to advancement and increases in salary commensurate with her male peers of similar job tenure, experience, qualification and ability. Defendant's excuses were variation on the theme that, for each position, she lacked certain 'skill-sets' required for the position, although the males given the positions had no better qualifications or skills.

29. From 2006-2015, Plaintiff was denied promotions, and the corresponding opportunity for higher pay, to fourteen positions at salary grades 15-19 pay level (she applied for eight but others were filled without postings). She was as qualified, or better qualified, for each of these positions than the male recipients.

30. This demonstrated culture of male preference in hiring and the pattern of WestRock's gender based refusals to advance Plaintiff is relevant to WestRock's like gender based discrimination in compensation and in the refusal to hire Plaintiff as an external candidate after her job was 'eliminated.'

31. On information and belief, WestRock compensated male foresters with no better qualifications or experience than Plaintiff more highly, and advanced them more quickly through



pay grades than Plaintiff, whose compensation was depressed. On information and belief, male foresters hired between 2012 and her termination, including Trent Badgley, Laurie Driggers, Justin Shanks, Eric Goodman, Grant Curry, Nathan Weaver and Randall Johnson, were each advanced in compensation more quickly, as new hires, than Plaintiff, a 35 year forester with two Masters degrees and far more experience.

32. Plaintiff was in the Grade 14 salary range from 2006 (when her base pay was \$60,000) to 2012 (base pay \$62,230). In 2012, the (then MeadWestvaco) salary range for Plaintiff's Grade 14 position was \$51,500–\$85,800, with a mid-point of \$68,650. Plaintiff's 2012 base salary was under mid-point and just over the bottom grade 14 quartile (\$60,075). In May, 2012, after she obtained her MBA, Plaintiff was finally moved to Grade 15.

33. At her November, 2015 termination, Plaintiff's base salary was \$69,901.56. Shortly after Plaintiff's termination, in June, 2016, WestRock posted a \$54,000-\$62,000 salary range for an entry level Forestry position. At that time, with 37 years of experience, Plaintiff was paid only 12.7% more than the top of the *entry level forester* salary range.

34. Within her Grade 15 range at termination, Plaintiff was at 14.8% of the pay range. Her base pay of \$69,901.56 was \$37,598.44 less than the \$107,500 maximum listed for the salary range.

35. Defendant's compensation decisions over time, which held Plaintiff's compensation well below the salary grade mid-point, was inequitable.

36. Based on Plaintiff's proven long-term excellent performance compared to her male peers, who had no better, or weaker performance, she should have been more highly compensated.

37. By comparison, Plaintiff's pay was stagnated compared to male employees who were advanced in the organization and compared to new arrivals into her pay grade. Her level 14 and 15 pay Grade peers were generally less senior and less experienced, but on information and belief were paid comparably to her.

38. Plaintiff's compensation should have progressed at the same pace as her male forestry peers, whether viewed by seniority, experience, qualification or work performed.

39. On information and belief, the compensation paid to male employees with Plaintiff's experience, qualifications, time in pay grade and time in position far exceeded that of Plaintiff.

40. On information and belief, Aaron Plaughter (male), grade 15, was consistently paid more than Plaintiff for the same types of work Plaintiff performed.

41. Mr. Plaughter was later selected over Plaintiff for the Manager, Certified Fiber position (grade 15).

42. Moreover, Plaintiff was systematically denied opportunities necessary to obtain higher paid positions, or opportunities for higher compensation within her grade, while no better qualified males were advanced in position, in compensation and in salary grade.

43. WestRock's compensation system was based on factors other than performance. The practices were systemic and female forestry employees were adversely treated and/or impacted through the following WestRock compensation policies or practices, which were:

- Subjectively based and made by male decision-makers favoring males as 'heads of household,' or because of social relationships from hunting, fishing, etc.;

- The result of self-selection of males, by males, for positions and for the allocation of finite budget dollars to shift available compensation dollars to male employees, both within salary grades and to higher pay grades;
- The result of Defendant's instruction to managers that employees should be rated as 'target' irrespective of performance above, or below, 'target;'
- The result of subjectively based decisions on a female's ability to supervise male subordinates, with attendant salary increases;

44. Plaintiff worked as a Certification Lead for the final 3 years of her employment. The Certification Lead was a function performed at the three mills then used by WestRock, Covington (Virginia), Mahrt (Alabama) and Evadale (Texas). On information and belief, Defendant compensated male Certification Leads more than Plaintiff, although they performed work requiring similar skill, effort and working conditions.

45. Defendant's evaluation rating scheme included four levels:

- Stretch (exceeds expectations)
- Target (meets expectations)
- Threshold (learning job/ barely meets expectations)
- Needs Improvement (not meeting expectations)

46. Plaintiff's objective performance consistently exceeded stated expectations. However, Defendant's managers were instructed to rate employees as "Target," or a unified rating, irrespective of actual performance. Bonus compensation was tied to the performance ratings. As applied, Plaintiff was paid less compensation than lesser performing male peers, who received the same evaluation compensation credit as Plaintiff. As such, Plaintiff's compensation was regularly depressed relative to lesser performing male employees.

### **Background Evidence of Positions Denied Plaintiff**

47. From 2009 to 2015 Plaintiff was denied, or not considered for, fourteen positions for which she was qualified.

48. She applied for, but was denied, the following positions: Manager, Supply Chain Operations (August, 2011); Sourcing Manager, Raw Materials (October, 2011); Sourcing Manager, Energy (March, 2012). On information and belief, males were selected for each such position. Plaintiff was not even given an interview.

49. Plaintiff also applied for, but was denied, several positions for which she was interviewed: Sourcing Manager, Packaging (April, 2012); Director, Sustainable Forestry (April, 2012); Manager, Certified Fiber (June, 2013); Evadale Stumpage Team Leader (May, 2014). Males were selected for each position.

50. Several positions for which Plaintiff was qualified were filled without posting the position: Eastern District Procurement Manager position (June, 2009) (R. Easton Loving, Jr./male); the Director of Wood Supply Strategy position (October, 2010) (Kirby Funderburke/male); and the Roundwood/Fuelwood Procurement Supervisor position (March, 2012) (James DeMoss/male). Plaintiff was qualified for each of these positions and would have applied had she been aware that the positions were available.

51. Plaintiff applied for the Florida Area Wood Procurement Manager (November, 2015) as an external candidate. Defendant denied Plaintiff the position.

52. When explanations were given as to her non-selection, they were vague references to the particular job or her skills. Plaintiff endeavored to increase her skills. She broadened the scope of her work, volunteered for work, developed new business methods and analysis for the benefit of the company and went back to school under the WestRock's program

to pay for advanced degrees. Until she obtained a Masters' Degree in Business Administration in May, 2012, she remained a pay Grade 14 and nowhere near the top of the Grade 14 scale.

**WestRock's Maneuvering Plaintiff into a Position Vulnerable to Elimination, While Protecting Favored Male Employees**

53. In May, 2012, WestRock planned to promote several male employees to grade 15 Lead Forester positions. Plaintiff had just received her MBA. She was included in the group promoted to Grade 15; however, the male Lead Foresters were given supervision over direct reports. Plaintiff's position included no reports. Plaintiff was told that her CFM Forester position was being eliminated and she would now be in a Grade 15 position titled 'Certification Lead.'

54. Defendant's glass ceiling for women extended to not allowing women to supervise men and was particularly evident for employees in field forestry positions, such as Plaintiff. Consistent with this, lead foresters promoted with Plaintiff were assigned reports – Plaintiff was not allowed to supervise the male reports.

55. The promoted males employees included Scott Schallenberger, was promoted to Grade 15 Lead Forester, Fuel and Fiber was assigned 4 male direct reports. Likewise, Keith Simmons promoted to Grade 15 Lead Forester, Fuel and Fiber was assigned 2 male direct reports. Plaintiff was not provided the opportunity to apply for these positions.

56. Organizationally, women foresters were limited to non-supervisory positions, the organizational charts showing that females were concentrated in low level forester positions relative to their male peers. There were no other female foresters at the Covington mill operations (which was not geographically limited to Covington but covered Virginia, West Virginia and into North Carolina), no female foresters at the Evadale mill operations (which

covered Texas and Louisiana), and only 2 female foresters at the Mahrt mill operations (which covered Alabama and Georgia).

57. The Grade 15 pay range was \$62,600-\$104,400. Plaintiff received a small base pay increase, from \$62,229 to \$65,340 but, as with her grade 14 pay, her Grade 15 pay continued to hover low in the Grade 15 pay range.

58. Prior to June, 2013, Plaintiff's supervisor, James DeMoss advised Plaintiff that she was very well qualified for the Stumpage Acquisition Supervisor position and that would be a next logical promotional step for her because the gentleman holding the position was due to retire within a few years.

59. When the June retirement was announced, the position became available. Plaintiff planned to apply. As her supervisor had supported her in the position, she expected to finally overcome the barrier to advancement.

60. But, when it was time to fill the position, Mr. DeMoss told Plaintiff that he had not mentioned the job posting to her because he knew she would not get the position. The Wood Department Manager, Ollie Kitchen, had selected someone for the position from another department and taken the job posting down "early."

61. Plaintiff learned that, despite the removed posting, two males - Charles McNeel and Grant Curry - were permitted to apply and were interviewed.

62. Plaintiff was denied the opportunity to compete for the position.

63. On May 13, 2013, WestRock announced that Greg Scheerer (male) had been selected for the position and was moving from a different branch of the company.

### **Plaintiff's Opposition to Discrimination**

64. The following day, Mr. DeMoss instructed Plaintiff that she and the Cooperative Forest Management (CFM) employees would be reporting to Mr. Scheerer. The man who previously held the position had worked as an individual contributor and worked solely on timber purchase agreements and payment. Plaintiff questioned Mr. DeMoss over Mr. Scheerer's selection as he lacked any background in certification or the Cooperative Forest Management (CFM) landowner assistance program.

65. She was told that Mr. Kitchen changed the reporting structure because he wanted Mr. Scheerer to have "more stones in his sack." Plaintiff told Mr. DeMoss that this felt like a demotion. He told her that he was "afraid that (she) would feel that way." Plaintiff asked how he and Mr. Kitchen were okay with this – and he replied, acknowledging the issue, "because of your background?" She reminded him that she was not only more qualified than Mr. Scheerer but that this was the very position he had told her would be the next logical promotional step for her. His only response was that "this is what Ollie (Kitchen) wants so this is the way it's going to be."

66. In addition to opposition to her supervisor, Plaintiff opposed WestRock's blatant misapplication of its internal promotion practices with a legally protected report to WestRock's human resources/recruiting personnel.

67. On May 15, 2013, she contacted WestRock's Corporate Recruiting department to inquire about her division's policy regarding internal posting. She was referred to Rosie Xu, who acknowledged a 2 week internal posting prior to seeking external candidates.

68. Plaintiff then forwarded Ms. Xu an email opposing the application of MeadWestvaco's internal hiring practices regarding Greg Scheerer's job announcement. Ms. Xu

emailed back, changing her earlier verbal position, and told Plaintiff that internal postings only were given 5 days before external postings, and not 2 weeks – this had not been Plaintiff’s understanding – or what Ms. Xu had confirmed to her by phone.

69. Mr. Scheerer’s lack of qualification for the position was demonstrated quickly. In a June 5, 2013 meeting, Mr. Scheerer confided to Plaintiff (in front of other employees), “I don’t know anything about certification so you’ll have to educate me.” Plaintiff was then instructed to handle all certification matters in a June 25, 2013 certification/quality review presentation to Mr. DeMoss’ reports, approximately 24 people.

70. Because Plaintiff was the only female forester in the Covington Mill district, she was the only female in attendance at the meeting.

71. In a subsequent meeting, Mr. Scheerer showed the assembled group videos of him fishing with Kirby Funderburke, a Director in the Forest Resources organization involved in personnel decisions, including hiring.

72. On information and belief, male management involved in promotion and compensation decisions allowed subjective factors in personnel decisions, including whether they enjoyed the same outside interests, or, in Mr. Scheerer’s case, was a fishing buddy.

73. Between 2013 and 2015, Plaintiff’s Grade 15 base compensation increased only \$4,561, from \$65,340 to \$69,901.

74. She continued attempts to increase her compensation and applied for Manager, Certified Fiber in June, 2013, a lateral Grade 15 position she was told by MWV HR Consultant, Ann DeVaul would provide a pay increase and increased potential for advancement and, in May, 2014, for the Evadale Stumpage Team Leader (Grade 16). She was denied both positions.



75. In or about July, 2014, Plaintiff applied for two positions with RockTenn, the predecessor to the WestRock merger. She interviewed with a RockTenn recruiter in Charlottesville and learned of two positions for which he felt she would be a great fit – a Fiber Procurement Forester in Hopewell, Virginia and a Quality Manager at RockTenn’s Norcross, Georgia headquarters. Plaintiff told him she was interested in both opportunities.

76. The recruiter advised her on September 11, 2014 that he had a conference call with two senior RockTenn managers but rejected her for both positions. She was told that Marc St. John did not feel she was a “good fit” for the Hopewell position and that Kevin Hudson had decided to rearrange duties and not fill the Georgia position. The recruiter said that he suggested to Mr. Hudson that they meet with Plaintiff, but he declined. She was told that Mr. Hudson knew that she was interested, but he was “not quite ready” to take action. The recruiter thanked her for being patient. She never heard back from RockTenn on either position.

**Plaintiff is Selected for Termination**

77. In early 2015, MeadWestvaco and RockTenn announced a merger, the resulting entity becoming WestRock. The merger was completed in July, 2015.

78. Post-merger, RockTenn’s Kevin Hudson became WestRock’s Senior Vice-President of Forest Resources. Marc St. John became WestRock’s Regional Fiber Supply Manager in Hopewell, Virginia.

79. During an interview with Mr. Hudson before the merger was finalized, Plaintiff advised him that she would be willing to relocate geographically.

80. In May, 2015, WestRock announced, but to Plaintiff’s knowledge did not post, a Fiber Quality Manager position in the Eastern Division. Plaintiff was qualified for the position

and made known her interest in the position. The job was not posted and Plaintiff had no opportunity to apply.

81. Later that year, WestRock (including her former MeadWestvaco decision makers) selected Plaintiff for termination, purportedly as part of a reduction-in-force. On November 3, 2015, Plaintiff was advised that her position “Lead Forester, Fiber Certification” had been eliminated and, she was terminated, effective that day.

82. WestRock continued to advertise for forestry positions for which Plaintiff was qualified. Despite Plaintiff’s conversation with Mr. Hudson about her willingness to relocate, she was not contacted by WestRock regarding the open positions.

83. The males promoted to Grade 15 Lead Forester at the time of Plaintiff’s promotion (Scott Schallenberger and Keith Simmons) were not affected by the lay-off – but the ‘Certification Lead’ title Plaintiff had been given in 2013 was eliminated. The certification functions at Covington mill also continued. Aaron Plaughter, Grade 15, took over Plaintiff’s job duties. WestRock retained three male CFM forester positions at the Mahrt mill (Plaintiff’s job title before it was changed to Certification Lead – her job duties had not changed).

84. Between July of 2012 and before the merger was announced, MeadWestvaco hired 7 male foresters, Trent Badgley, Laurie Driggers, Justin Shanks, Eric Goodman, Grant Curry, Nathan Weaver and Randall Johnson. None were selected for elimination during the reduction in force.

85. On information and belief, WestRock moved Plaintiff into the Grade 15 ‘Certification Lead’ without reports so as to put her at risk of anticipated future position eliminations as compared to the male Lead Foresters. The positions for the male Lead Foresters,

or males with certification responsibilities, were not eliminated in the November, 2015 reduction-in-force.

### **Hiring Discrimination as External Applicant**

86. After her termination, Griswold applied for an advertised WestRock position for which she was qualified, Florida Area Wood Procurement Manager, as an external candidate.

87. The position had been posted on September 4, 2015 and WestRock could have transferred her to the position while she was still employed, but did not offer Plaintiff that option.

88. On December 17, 2015 Plaintiff was verbally notified that she had been rejected for the position. The WestRock “Talent Acquisition” recruiter who interviewed her told her that he had spoken to Kevin Hudson (WestRock VP of Forest Resources) who had reviewed Plaintiff’s application and told him that Plaintiff “wasn’t quite the right fit compared to other candidates, some in the same geographic area.”

89. Plaintiff was disturbed to see that, in fact, the position had not been filled and remained open in late January, 2016.

90. WestRock refused to award the position to Griswold and misrepresented the position’s status in an attempt to deny her the position.

91. On information and belief, Defendant denied Plaintiff the Florida Area Wood Procurement Manager opportunity based on her gender, consistent with the pattern of refusals to promote Plaintiff.

92. On information and belief, Defendant WestRock has denied other qualified female applicants positions in the Operations (MeadWestvaco) and Forest Resources (RockTenn/WestRock) Divisions for which they were qualified.

93. Plaintiff has suffered damages as a result of the discriminatory treatment, and the impact of Defendant's compensation and hiring policies and practices, as outlined hereinabove. Plaintiff has been damaged in the terms and conditions of her employment, including economically and emotionally resulting from the Firm's repeated instances of gender based disparate treatment and retaliation.

94. Defendant has engaged in a continuing course of gender based discrimination that includes a broad spectrum of the terms, conditions and privileges of WestRock employment and extends from application to termination.

95. The decision makers in the Forest Resources division of WestRock, and its predecessors MeadWestvaco (Operations) and RockTenn (Forest Resources) are a small, centralized group of male executives, as evidenced by the Sr. VP of WestRock, Kevin Hudson's, decision not to offer Plaintiff, an external candidate, a position at RockTenn in 2014.

**RULE 23(b)(3) HIRE CLAIMS UNDER TITLE VII**

96. Plaintiff further brings this action on her own behalf and as a Class Action pursuant to Rules 23(b)(3) of the Federal Rules of Civil Procedure on behalf of the following proposed class:

All external female applicants for Forestry positions in the Operations (MeadWestvaco) and Forest Resources (RockTenn and WestRock) Divisions from May 12, 2015 to date who were not hired by WestRock, or its processor entities MeadWestvaco and/or RockTenn (the "Class").

97. Excluded from the Class are Defendant, its parents, subsidiaries and affiliates, their directors and officers, and members of their immediate families.

98. Upon completion of discovery with respect to the scope of the Class, Plaintiff reserves the right to amend the Class definition.

99. Numerosity: The members of the Class are so numerous and geographically diverse that joinder of all of them is impracticable. While the exact number and identities of members of the Class are unknown to Plaintiff at this time and can only be ascertained through appropriate discovery, Plaintiff believes and therefore avers that there are dozens of putative Class members throughout the United States.

100. Commonality: There are questions of fact and law common to members of the Class that predominate over any questions affecting any individual members including, *inter alia*, the following:

- a. Whether WestRock discriminated against female applicants to forestry positions on the basis of their gender;
- b. Whether WestRock has engaged in a pattern or practice of gender discrimination in hiring for forestry positions;
- c. Whether the applicant flow data demonstrates that the disparity in the numbers of forestry positions WestRock has historically awarded to males versus females resulted from gender discrimination;
- d. Whether WestRock decision makers have used selection processes that have had an adverse impact on the success of female applicants for forestry positions;
- e. Whether WestRock has, or had, a uniform policy and practice of discriminating against females in consideration of forestry positions;
- f. Whether WestRock's asserted actions as alleged were intentional;
- g. Whether Plaintiff and the Class are entitled to a declaratory judgment that WestRock's conduct violated and/or continues to violate Title VII of the 1964 Civil Rights Act of 1964, as amended;
- h. Whether Plaintiff and the Class are entitled to compensatory relief, including unpaid wages, interest, damages, attorneys' fees and costs and if so, in what amounts; and
- i. Whether Plaintiff and the Class are entitled to equitable relief, including injunctive relief to prohibit future policies and practices depriving Plaintiff and others similarly situated of their rights under Title VII to the 1964 Civil Rights Act, as amended.

101. Typicality: Plaintiff's application claims are typical of the claims of the other members of the Class in that Plaintiff alleges a uniform policy and practice by Defendant towards members of the Class. Plaintiff, like other members of the Class, asserts that she was not hired because of her gender and that gender is considered a negative factor in hiring decisions for forestry positions. Plaintiff and the other members of the Class seek identical remedies under identical legal theories, and there is no antagonism or material factual variation between Plaintiff's claims and those of the Class.

102. Adequacy: Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff's claims are coextensive with, and not antagonistic to, the claims of the other members of the Class. Plaintiff is willing and able to vigorously prosecute this action on behalf of the Class, and Plaintiff has retained competent counsel experienced in litigation of this nature.

103. Plaintiff brings this action under Rule 23(b)(3) because common questions of law and fact predominate over questions of law and fact affecting individual members of the Class. The predominant issues in this action are whether Defendant is violating and has violated Title VII to the 1964 Civil Rights Act, as amended, by its failure to hire external female applicants for forestry positions. In addition, the expense of litigating each Class member's claim individually would be so cost prohibitive as to deny Class members a viable remedy. Certification under Rule 23(b)(3) is appropriate because a class action is superior to the other available methods for the fair and efficient adjudication of this action, and Plaintiff envisions no unusual difficulty in the management of this action as a class action.

**COUNT ONE**

**Title VII to the 1964 Civil Rights Act  
42 U.S.C. § 2000e, *et seq.* as amended  
Class Gender-Based Applicant Discrimination**

104. Plaintiff incorporates by reference and re-alleges the preceding paragraphs as though set forth fully herein.

105. WestRock, and its predecessor entities, by and through the actions of its agents and representatives, which it ratified and condoned, and its failures to act, discriminated against Plaintiff, and all other similarly situated female applicants for Forestry positions, on the basis of gender, and has denied Plaintiff, and the class, rights guaranteed pursuant to 42 U.S.C. § 2000e, *et seq.*, as amended by the Civil Rights Act of 1991, as amended.

106. As a consequence of WestRock's discrimination, Plaintiff, and the class, have suffered, continue to suffer and will in the future suffer damages resulting from the lost job opportunities, including economic losses, lost wages and other financial incidents and benefits of employment, and will continue to suffer such losses.

107. As a consequence of the acts and omissions of WestRock, Plaintiff, and the class, have incurred and will continue to incur attorneys' fees, costs and other incidental expenses.

**COUNT TWO**

**Title VII to the 1964 Civil Rights Act  
42 U.S.C. § 2000e, *et seq.* as amended, including Lilly Ledbetter Fair Pay Act  
Individual Gender-Based Discrimination**

108. Plaintiff incorporates by reference and re-alleges the preceding paragraphs as though set forth fully herein.

109. Plaintiff's depressed compensation is the result of an intentional discriminatory compensation scheme in which male supervisors provide male forestry employees higher pay,

and quicker compensation increases relative to experience and tenure, than female employees and/or the impact of subjective compensation decisions, which favor male employees.

110. Under such scheme, or the impact of such subjective compensation decisions, the compensation of male foresters with like experience, time in grade and time in position has steadily increased while the compensation paid to Plaintiff remained stagnant or hovered at or near the bottom of their respective pay grades.

111. Moreover, Plaintiff's pay within her pay grade has approximated less senior male forestry employees than her male peers with like experience, qualification or tenure.

112. Plaintiff's selection for termination was a continuation of the gender biased selection practices in effect at WestRock which had resulted in WestRock's pattern of refusals to select Plaintiff for promotion.

113. WestRock and its predecessor entities discriminated against Plaintiff in the terms, conditions and privileges of her employment on the basis of her gender, including compensation, in violation of 42 U.S.C. § 2000e, *et seq.*, as amended by the Civil Rights Act of 1991, as amended by the Lilly Ledbetter Fair Pay Act of 2009.

114. As a consequence of WestRock's discrimination, Plaintiff has suffered, continues to suffer and will in the future suffer emotional distress, anxiety, stress, embarrassment, humiliation, pain, and suffering.

115. As a consequence of WestRock's actions, Plaintiff has suffered economic losses, including lost wages and other financial incidents and benefits of employment, and will continue to suffer such losses.

116. As a consequence of the acts and omissions of WestRock, Plaintiff has incurred and will continue to incur attorneys' fees, costs and other incidental expenses.



**COUNT THREE**

**Title VII, 42 U.S.C. § 2000e, *et seq.* (as amended)  
Retaliation**

117. Plaintiff incorporates by reference and re-alleges the preceding paragraphs as though set forth fully herein.

118. Plaintiff opposed and challenged her gender-based selective treatment through internal meetings with Firm leadership.

119. Plaintiff opposed gender based discrimination in compensation and promotions in internal discussions with Defendant's Recruiting personnel and with her immediate supervisor.

120. WestRock, through its agents, acted to dissuade Plaintiff from opposing or challenging disparate gender based treatment.

121. WestRock unlawfully terminated Plaintiff's employment, in violation of 42 U.S.C. § 2000(e), *et seq.*, on the basis of her challenges to gender-based compensation disparities and bars to promotion or other employment opportunities.

122. As a consequence of this retaliation, Plaintiff has suffered emotional distress, anxiety, stress, embarrassment, humiliation, pain, and suffering.

123. As a consequence of this retaliation, Plaintiff has suffered economic losses, including loss of promotional opportunities and increased levels of compensation and benefits and other financial incidents and benefits of employment.

124. As a consequence of this retaliation, Plaintiff has incurred and will continue to incur attorneys' fees, costs and other incidental expenses.

**WHEREFORE**, Plaintiff Mona Griswold prays that judgment be entered in her favor and against WestRock Company; and requests in addition that this Court enters Orders, as follows:

Class Relief:

- (a) After appropriate class discovery, certifying a Rule 23(b)(3) class for rejected female applicants pursuant to Rule 23(b)(3) for violations of 42 U.S.C. § 2000e, *et seq.*, as amended (“Title VII”), naming Plaintiff as the representative of the Class and its attorneys as Class counsel and issuing notice to the class;
- (b) Declaring that the acts and hiring practices complained of herein are in violation of Plaintiff’s, and the class’, rights as secured by 42 U.S.C. § 2000e, *et seq.*, as amended (“Title VII”);
- (c) Permanently enjoining Defendant from continuing or maintaining a policy, practice or custom of denying, abridging, withholding or conditioning the rights of applicants on the basis of gender, as guaranteed by 42 U.S.C. § 2000e-2(a), as amended;
- (d) Entering judgment that the Plaintiff, and all others similarly situated, be awarded relief pursuant to Title VII and Rule 23(b)(3);
- (e) Entering judgment awarding Plaintiff, and those similarly situated, reasonable attorney’s fees and costs of this suit, pursuant to 42 U.S.C. § 2000e, *et seq.*, as amended; and
- (f) Such other relief to which this Court may find Plaintiff, and the proposed class, justly entitled;

Individual Relief

- (g) Declaring that the acts and practices complained of herein are in violation of Plaintiff’s, and the class’, rights as secured by 42 U.S.C. § 2000e, *et seq.*, as amended (“Title VII”), as amended by the Lilly Ledbetter Fair Pay Act of 2009;

- (h) Permanently enjoining Defendant from continuing or maintaining a policy, practice or custom of denying, abridging, withholding or conditioning the rights of employees on the basis of gender, as guaranteed by 42 U.S.C. § 2000e-2(a), as amended;
- (i) Awarding Plaintiff equitable relief against Defendant in the form of front pay in lieu of reinstatement and other appropriate equitable relief for lost employment benefits, and such other affirmative relief as may be appropriate, and for all other wages and benefits lost or denied for violations of 42 U.S.C. § 2000e, as amended, including the Lilly Ledbetter Fair Pay Act;
- (j) Awarding Plaintiff compensatory damages under 42 U.S.C. § 2000e, *et seq.*, against Defendant, in an amount to be determined by the jury at trial but not less than \$300,000 per Title VII Count;
- (k) Awarding Plaintiff punitive damages under 42 U.S.C. § 2000e, *et seq.*, against Defendant, in an amount to be determined by the jury at trial but not less than \$300,000 per Title VII Count;
- (l) Awarding Plaintiff her attorneys' fees and costs incurred in this action, together with expert witness fees and expenses, against Defendant;
- (m) Awarding pre- and post-judgment interest at the applicable legal rates;
- (n) Ordering equitable relief of back pay and benefits awarded adjusted for the adverse tax consequences of a lump sum payment, together with pre- and post-judgment interest compounded using the Internal Revenue Service adjusted prime rate;
- (o) Ordering such other relief as this Court deems just and proper.

**TRIAL BY JURY IS DEMANDED**

**MONA GRISWOLD, individually and on behalf  
of others similarly situated,**

By: /s/ Harris D. Butler, III  
Harris D. Butler, III (VSB No. 26483)  
Paul Falabella (VSB No. 81199)  
BUTLER ROYALS, PLC  
140 Virginia Street, Suite 302  
Richmond, Virginia 23219  
(804) 648-4848 (telephone)  
(804) 237-0413 (facsimile)  
harris.butler@butlerroyals.com  
paul.falabella@butlerroyals.com  
*Counsel for Plaintiffs*

JS 44 (Rev. 06/17)

### CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b></p> <p>MONA GRISWOLD, individually and on behalf of others similarly situated,</p> <p><b>(b)</b> County of Residence of First Listed Plaintiff <u>Forks, Washington</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c)</b> Attorneys <i>(Firm Name, Address, and Telephone Number)</i> Harris D. Butler, Esquire, Paul Falabella, Esquire Butler Royals, PLC, 140 Virginia Street, Suite 302 Richmond, VA 23219 (804) 648-4848</p>	<p><b>DEFENDANTS</b></p> <p>WESTROCK COMPANY</p> <p>County of Residence of First Listed Defendant <u>City of Richmond, VA</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
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<p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

<p><b>CONTRACT</b></p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment &amp; Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans <i>(Excludes Veterans)</i></p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p><b>TORTS</b></p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel &amp; Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 367 Health Care/Phannaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p><b>PERSONAL PROPERTY</b></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><b>FORFEITURE/PENALTY</b></p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p><b>LABOR</b></p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p><b>IMMIGRATION</b></p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p><b>BANKRUPTCY</b></p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><b>PROPERTY RIGHTS</b></p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application</p> <p><input type="checkbox"/> 840 Trademark</p> <p><b>SOCIAL SECURITY</b></p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p><b>FEDERAL TAX SUITS</b></p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS - Third Party 26 USC 7609</p>	<p><b>OTHER STATUTES</b></p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
<p><b>REAL PROPERTY</b></p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease &amp; Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p><b>CIVIL RIGHTS</b></p> <p><input type="checkbox"/> 440 Other Civil Rights</p> <p><input type="checkbox"/> 441 Voting</p> <p><input checked="" type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 445 Amer. w/Disabilities - Employment</p> <p><input type="checkbox"/> 446 Amer. w/Disabilities - Other</p> <p><input type="checkbox"/> 448 Education</p>	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <p><input type="checkbox"/> 463 Alien Detainee</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><b>Other:</b></p> <p><input type="checkbox"/> 540 Mandamus &amp; Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement</p>		

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from Another District *(specify)*     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:  
**Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e et seq., as amended, the Lilly Ledbetter Fair Pay of 2009**

Brief description of cause:  
**Discriminatory employment practices-glass ceiling for female employees in compensation and hiring**

**VII. REQUESTED IN COMPLAINT:**     CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    DEMAND \$ 5,000,000.00    CHECK YES only if demanded in complaint. JURY DEMAND:  Yes     No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE 12/11/2017    SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY    RECEIPT # \_\_\_\_\_    AMOUNT \_\_\_\_\_    APPLYING IFP \_\_\_\_\_    JUDGE \_\_\_\_\_    MAG. JUDGE \_\_\_\_\_

December 11, 2017

**BY ELECTRONIC FILING**

Fernando Galindo, Clerk  
U.S. District Court  
Eastern District of Virginia  
701 East Broad Street, Suite 3000  
Richmond, VA 23219

Re: Mona Griswold, et al. v. WestRock Company

Dear Mr. Galindo:

Enclosed for electronic filing, please find our Complaint, Civil Cover Sheet and Summons. Filing fees have been paid electronically through Pay.Gov. Upon issuance of the summons, please notify our paralegal, Teri Butler, at 804.648.4848. We have arranged for private process of server. We will arrange for pick-up of the service copies.

As always if you should have any questions, please do not hesitate to let us know.

Sincerely,

  
Harris D. Butler

HDB/tb

Enclosures: As stated



# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [WestRock Company Accused of Discriminating Against Female Workers](#)

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