



1 PLAINTIFF Alma Martinez, Ph.D. (“Professor Martinez” or “Plaintiff”) alleges  
2 as follows:

3 **INTRODUCTION**

4 1. This action seeks remedies for unlawful discrimination that Professor  
5 Martinez experienced in her position as an Assistant Professor of Theatre for Pomona  
6 College, and Does 1 to 20, inclusive (collectively, “Defendants”). In terminating  
7 Professor Martinez and denying her tenure, the Defendants discriminated against  
8 Professor Martinez on the basis of her national origin and gender.

9 **JURISDICTION AND VENUE**

10 2. Venue is proper in this Court because the illegal acts against the Plaintiff  
11 took place in the County of Los Angeles. Pomona College also maintains its college  
12 campus in this county.

13 3. The amount in controversy is within the jurisdiction of this Court.

14 **PARTIES**

15 4. Professor Martinez is an individual of Latino/Hispanic origin. She  
16 resides in Los Angeles County, California. Pomona College employed Martinez in  
17 Los Angeles County, California, for approximately six (6) years, until June, 2013. At  
18 all times during her employment, Martinez was fully qualified for her position and was  
19 performing her job duties well. Pomona College subjected Martinez to discrimination  
20 on the basis of her national origin and gender.

21 5. Defendant Pomona College is a private college. Defendant operates  
22 Pomona College in Los Angeles County: Pomona College is located at 333 N. College  
23 Way, Claremont, California 91711.

24 6. The true names and capacities, whether individual, corporate, associate,  
25 or otherwise, and the true involvement of Defendants sued here as Does 1 through 20,  
26 inclusive, are unknown to Plaintiff who therefore sues these Defendants by fictitious  
27 names and will amend this Complaint to show the true names, capacities and  
28 involvement when ascertained. Plaintiff is informed and believes and alleges that each

1 of the Defendants designated as a Doe is responsible in some manner for the events  
2 and happenings referred to here, and that Plaintiff's injuries and damages were  
3 proximately caused by these Defendants.

4 **FACTUAL ALLEGATIONS**

5 7. In or about 2006, Pomona College hired Professor Martinez as a tenure-  
6 track Assistant Professor of Theatre.

7 8. Plaintiff's career at Pomona College was very successful. At all times  
8 during her employment, Professor Martinez was fully qualified for her position and  
9 was performing her job duties well.

10 9. On September 30, 2011, the Department of Theatre and Dance at Pomona  
11 College submitted a departmental recommendation unanimously supporting Professor  
12 Martinez's promotion to Associate Professor with tenure.

13 10. Under the Pomona College Faculty Handbook, the criteria for tenure are  
14 intellectual leadership, professional achievement, and effective service.

15 11. Professor Martinez met all of the criteria for tenure.

16 12. On or about January 18, 2013, Pomona College denied Professor  
17 Martinez tenure and notified her that they would be terminating her employment.

18 13. Professor Martinez's last day of employment at Pomona College was on  
19 June 30, 2013.

20 **EXHAUSTION OF ADMINISTRATIVE PROCEEDINGS**

21 14. Plaintiff timely exhausted her administrative remedies by filing  
22 complaints against Pomona College with the California Department of Fair  
23 Employment and Housing (DFEH) and thereafter received right-to-sue notices.  
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