STATE OF NEW YORK SUPREME COURT, COUNTY OF NEW YORK

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CLYDE WILSON, ) Index No.\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff, )

-against- ) **COMPLAINT FOR REDRESS**

CHARLES JACOBS, ) **FOR WRONGFUL DISMISSAL/**

Defendant. ) **TERMINATION**

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1. Introduction:

The Plaintiff, Clyde Wilson, is represented by the Disraeli Law Firm. The Disraeli Law Firm is located on 650 West 47th Street New York, NY, 10036. The Disraeli Law Firm brings this Complaint to obtain employment restitution against defendant, Charles Jacobs.

1. Parties:
2. Plaintiff, Clyde Wilson, is an individual. Plaintiff resides at 470 Neptune Avenue, Apartment 14a, Brooklyn, NY, 11224.
3. Defendant, Charles Jacobs, is a senior partner at his eponymously-named New York Law Firm. Defendant has an office for the regular transaction of business located at 650 West 47th Street, New York, NY 10036.
4. Jurisdiction and Venue:
5. This court has jurisdiction as the defendant is a domestic corporation (law firm) which regularly transacts business in the State of New York.
6. This court has venue because the defendant is based in New York County, which is where the defendant’s firm was incorporated in and operates out of.
7. Statement of Facts:
8. The incident in question occurred on October 22nd 2018. Prior to that date, the plaintiff’s understanding of his professional relationship with the defendant was colored by a delusive impression which signified favorable work auspices. On the date in question, plaintiff entered the office of the defendant. Upon entry into the office of the defendant, plaintiff was informed that his employment at the defendant’s firm — for which the plaintiff’s professional capacity was file clerk — had been immediately terminated. The pretext proffered by the defendant was a spurious one; the pretext impugned the plaintiff’s age to have been the necessary condition which (a) preluded the plaintiff from the satisfactory completion of his duties which necessarily led to the legally dubious outcome of (b) the summary termination of plaintiff from Dice and Jacob’s Law. The plaintiff’s replacement, a man by the name of Dave Davidson, is twenty years the plaintiff’s junior — the exact number of years which the plaintiff was in the loyal gainful employ of the defendant.
9. The defendant, however, had no legal merit when terminating the plaintiff’s employment. The plaintiff, in his professional capacity as a file clerk at the defendant’s law firm (Dice & Jacobs LLC), was highly respected by his co-workers and received superlative marks by his superiors when the firm would undertake its yearly staff audit.
10. The reason proffered by the defendant; namely, that age was the essential factor in the termination was specious. As attested to by the primary care physician (PCP) – Dr. Harold Jacob – my client is in exceptional health[[1]](#footnote-1).
11. Cause of Action:

**COUNT 1 – CIVIL RIGHTS VIOLATION**

1. Plaintiff repeats and re-alleges the allegations contained in paragraphs 5 and 6 as fully set forth here.
2. As a direct and proximate cause of the actions taken by the defendant against the plaintiff, the plaintiff lost gainful employment and was forced to search elsewhere for a file clerk position; a position which he is overwhelmingly qualified for. However, owing to similar ageist (discrimination of persons based on their age) practices employed by other law firms in vetting prospective employees, the plaintiff has been unemployed since he was illegally dismissed.
3. Prayer for Relief:
4. The plaintiff seeks his immediate reinstatement to his former job, with all attendant benefits (including due consideration for promotions/raises) and without any ill will, bias, or malice harbored by the defendant toward the plaintiff.
5. The plaintiff seeks reimbursement for all travel expenses incurred while unemployed and seeking another job.
6. And all other relief to which this Court determines plaintiff is entitled under the law.

Respectfully submitted,

Law Offices of John Disraeli, Esq.

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By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Paralegal to John Disraeli, Eric Komar

ATTORNEY FOR PLAINTIFF,

CLYDE WILSON

1. Dr. Jacob has provided a comprehensive write-up of plaintiff’s health. [↑](#footnote-ref-1)