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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANK BONNIN,

Plaintiff,

v.

SMALLTOWNPAPERS, INC.,

Defendant.

NO. **C 08-1261** RAJ

COMPLAINT AND DEMAND
FOR JURY TRIAL

Plaintiff Frank Bonnin ("Mr. Bonnin"), by the undersigned attorneys, makes the following averments:

1. This is a civil action brought pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994, 38 U.S.C. §§ 4301 - 4333 ("USERRA").

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action pursuant to 38 U.S.C. § 4323(b).

3. Venue is proper in this district under 38 U.S.C. § 4323(c)(2) because defendant SmallTownPapers, Inc. ("STP") maintains a place of business in this district. Additionally, venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to this action occurred in this district.



08-CV-01261-CMP

COMPLAINT - 1

UNITED STATES DEPARTMENT OF JUSTICE
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
(202) 514-3831

1 4. All statutory conditions precedent to the institution to this lawsuit have been fulfilled.

2 **PARTIES**

3 5. Mr. Bonnin resides in Port Orchard, Washington, which is within the jurisdiction of
4 this Court.
5

6 6. STP maintains a place of business at 5026 California Avenue, Seattle, Washington
7 98136, which is within the jurisdiction of this Court.

