

(j) Plaintiff loss of retirements benefits for ten (10) years through one same employer to be added to promoted a new position if was given as related work experiences which make plaintiff to face another crises at the time of need.

(k) Other significant damage impacted certain benefits towards future generation for better life and to a make a different in each human being life

Plaintiff respectfully praying for this court and sought relief as follow:

Plaintiff demand amount of \$300,000.00 three hundreds thousands dollars on basis of EEOC law for Financial Guidelines for employer with 30,000.00 thirty thousands employees.

Plaintiff seeking placement in the job and back pay award and benefits the plaintiff would have received if equal opportunity was provided similar for those who were selected for plenty positions was available as \$35 dollars an hours as just and fair as a full time employee since April 28,2010 with replacement to full benefits plaintiff could have if was selected. Defendant has full responsibility to pay plaintiff's student's loan as \$52,000.00 but doubled by now.

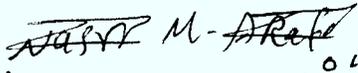
Plaintiff respectfully seeking request to enforce defendant to take positive steps to prevent future discrimination and to maintain the application of policies consequences. And for other further and alternative relief as the court may deem just and proper

Certification

Plaintiff, Nasra M. Arafat certify that I obligated to prepare and file my pleadings as a pro-se to the best of my knowledge and better formed after an inquiry reasonable under the circumstances: it is not being presented for any improper purpose nor to increase the cost and the time of litigation .

Respectfully submitted

This 23rd day of April, 20 12.



Plaintiff / Nasra M. Arafat

Certificate of Service

I hereby certify as pro-se that a true and correct copy of the foregoing, **[PLAINTIFF'S AMENDED ORIGINAL COMPLAINT FOR EMPLOYMENT DISCIMINATION]** was served with the clerk of the court and send by prove of service mail on April 23rd ,2012 on all counsel or parties of record on the Service List below.



Signature of plaintiff

SERVICE LIST

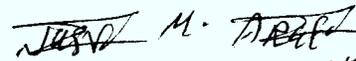
Defendant / School Board Broward County

Michael T. Burke and Damiane H. Albert Esq. / Counsel for Defendant
For/ School Board Broward County (public schools)
2455 East Sunrise Blv. Suite # 1000
Fort Lauderdale FL, 33304

And,

Omitting party / EEOC Local Office
2 South Biscayne Blv. Suite # 2700
Miami FL, 33131

Date: April 23rd ,2012


04/23/12

Nasra M. Arafat Pro-Se /plaintiff

P.O.BOX 772177

Coral Springs FL, 33077

Nasra M. Arafat (pervious married Ibrahim)
P.O.BOX 772177
Coral Sprigs FL, 33077

February 02,2011

Equal Employment Opportunity Commission
EEOC Miami District Office
2 South Biscayne Blve Suit # 2700
Miami Fl, 33131

Agency/charge #510-2011-02262

Add and correct information in form EEOC 5(11/09)

Dear / district office representative:

Thank your very much for your time and effort to review and complete the paper work to enter and / or filed a charge regarding my employer Broward Public School discrimination issue.

Please be advised that I'm sending the updating 2nd form EEOC # 5 (11/09) dated Feb. 01,2011 after I did add and / or correct some information by putting my middle initial beside any correction or addition. While this 2nd one I did signed at your office after the 1st signed similar one was canceled in the same day because it was incomplete with essential information like I'm 54 years old Egyptian & American citizen since 1985 (Date of Birth ... and the age discrimination box which will cause conflict with facts occurred and reported in all my attachments plus a copy from my official response to my employer as well as the singed & completed intake questionnaire which was given to you on Feb. 01,201 during filling this form.

This 2nd singed updated one which I reviewed it after I went home I realized that the other following information should be added and /or corrected with my middle initial. This information as follow:

- 1- the box for the number of my employer employees is more than 500 (it is 30,000.00 employees) not 201-500. Retaliation box not applicable in my case and it is blank in my intake questionnaire.
- 2-the phone number for my employer should be added which (754) 321-0000
- 3-I don't have any cell-phone and the number reported in the form is a fax line which it can be used to send fax to me.
- 4-This form stated that there is a statement of privacy (act 1974) and other information I should review please send or fax me a copy as soon as possible or where I can find these information because I did not see or read it while I was at your office.

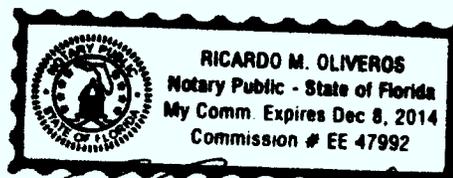
I certify that this Notarized affidavit (notice) for updated EEOC 5 (11/09) form send by fax (305)808-1855 and certified mail to: EEOC 2 South Biscayne Blv Suite # 2700 Maimi FL, 33131 for consideration as a complete, true and correct information.

Thank you for your time and support as well as your understanding and attention to this matter

Sincerely

Nasra M Arafat 2/3/11

Nasra M. Arafat/(pervious married name Ibrahim)



[Handwritten signature]
EX DEC-8-14

A-1

USPS REG # 452301127

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

FEPA
 EEOC

510-2011-02262

Florida Commission on Human Relations

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

N.M. married name 2/2/11
Ms. Nasra M. Arafat (previously known as Ibrahim)

Home Phone (Incl. Area Code)

2/2/11
 Fax **(954) 247-9061**

Date of Birth

03/09/1957

Street Address

City, State and ZIP Code

P.O. Box 772177, Coral Springs, FL 33077

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

BROWARD COUNTY SCHOOL BOARD

No. Employees, Members

MORE THAN 500
201-800

Phone No. (Include Area Code)

(754) 321-0000

Street Address

City, State and ZIP Code

600 So 3rd Avenue, Ft Lauderdale, FL 33301

DISCRIMINATION BASED ON (Check appropriate box(es).)

N.M. 2/2/11
 RACE COLOR SEX RELIGION NATIONAL ORIGIN
N/A RETALIATION AGE DISABILITY GENETIC INFORMATION
N/A OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest Latest

04-28-2010

10-05-2010

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. I am a 54 year old Middle Eastern Muslim Female. I was employed by the above named Respondent since March 2001, as a Substitute Teacher. During my employment, I have been subjected to harassment in regards to my National Origin and Religion. On various occasions, I have reported for work at different schools and have been told that I am no longer needed or placed on a do not call list. Also, I have applied for promotional positions after receiving my Master's Degree in Educational Leadership and Teacher's Certification in Science, but have never received a response in regards to the status of this promotion. Other Male individuals have sought this position and have been hired at a higher pay rate. I was sent to schools getting lower pay rate where other employees were sent to different schools earning more than myself. On April 28, 2010, I was advised by Respondent that my name had been removed from the approved list of substitute teachers. I have sent various complaint letters regarding this incident to no avail. On October 05, 2010, while attending a Public Job Fair held by Broward County Schools, I was informed that I had to leave and could not apply for any open positions by Director for Instructional Staffing Susan Rockman. I believe Ms. Rockman wanted younger individuals who were fresh graduates. I believe that the above incidents have occurred in an effort to keep me from obtaining gainful employment.
- II. The reason given for my name being removed from the approved list was that I had six negative evaluations yet, this is untrue. No response has been given to my inquiries for my lack of promotion.
- III. I believe that I have been discriminated against on the basis of my Sex/Female, Age/54, National Origin/Middle Eastern, and Religion/Muslim, in violation of Title VII Civil Rights Act of 1964, as amended, the Age Discrimination in Employment Act of 1967, as amended, and The Equal Employment Act of 1963, as amended.

(See Attached Document)

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Feb 01, 2011

Date

Nasra M. Arafat 2/2/11
Nasra M. Arafat 2/1/11

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

A-2
 A-2

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Nasra Arafat
P.O. Box 772177
Coral Springs, FL 33077

From: Miami District Office
2 South Biscayne Blvd
Suite 2700
Miami, FL 33131

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (20 CF 51601.7(a))

EEOC Charge No. 610-2011-02262
EEC : Representative Delorah Bauer,
Ser. or Federal Investigator
Telephone No. (305) 808-1766

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
[X] The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the responder(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission

JAN 20 2011

Enclosure(s)

EEOC Miami District Office

(Date Mailed)

cc

she declined any assistance
Dilora Martin-Ogburn
Executive Director, Benefits and EEO Compliance
SCHOOL BOARD OF BROWARD COUNTY
800 S.E. 3rd Avenue, 14th Floor
Fort Lauderdale, FL 33301

MALCOLM S. MEDLEY,
District Director

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 11-62525-CIV-DIMITROULEAS/SNOW**

NASRA M. ARAFAT,

Plaintiff,

v.

SCHOOL BOARD OF BROWARD
COUNTY,

Defendant.

**DEFENDANT SCHOOL BOARD OF BROWARD COUNTY'S MOTION TO DISMISS
AMENDED COMPLAINT OR IN THE ALTERNATIVE MOTION FOR MORE
DEFINITE STATEMENT**

The Defendant, School Board of Broward County ("School Board"), by and through its undersigned attorneys, pursuant to Rules 12(b)(6) and 12(e) of the Federal Rules of Civil Procedure request that the Court enter an Order Dismissing Plaintiff's Amended Complaint for failure to state a claim upon which relief can be granted and as grounds therefor would show:

1. On April 23, 2012, Plaintiff filed a four count Amended Complaint [DE 33]. The Amended Complaint alleges that Plaintiff began working periodically as a substitute teacher for the School Board during the 2000-2001 school year. See Complaint ¶ 6. The Amended Complaint further alleges that Plaintiff was hired as a full time teacher at Deerfield Beach Middle School for the 2005-2006 school year. See Complaint ¶ 7. After one semester at Deerfield Beach Middle School, Plaintiff was removed as a full time teacher and then continued to work periodically as a substitute teacher. See Complaint ¶ 8. The Amended Complaint alleges that on April 28, 2010, the School Board's director of instructional staffing advised Plaintiff that she had been removed from the substitute teacher list because of six (6) negative evaluations received from schools where

Plaintiff had worked. See Complaint ¶ 9. The Amended Complaint further alleges that on October 5, 2010, Plaintiff attended a job fair that was being held by Defendant and Defendant's director of instructional staffing asked Plaintiff to leave. See Complaint ¶ 18C. On February 1, 2011, Plaintiff filed a charge of discrimination with the Equal Employment Opportunity Commission (EEOC), alleging discrimination on the basis of age, national origin, race, religion and sex. See Complaint ¶ 12.

2. Count I of the Amended Complaint attempts to state a cause of action for gender based harassment under Title VII. Count II alleges discrimination because Plaintiff was paid less than other substitute teachers. Count III alleges discrimination in violation of the Age Discrimination in Employment Act (ADEA). Count IV alleges discrimination due to the fact that Plaintiff was demoted and terminated.¹

3. The Complaint fails to state a claim upon which relief can be granted against Defendant School Board for the following reasons:

(a) Many of the claims alleging discrimination are time barred because the acts giving rise to the claims occurred more than three hundred (300) days prior to Plaintiff's charge of discrimination with the EEOC.

(b) Count I of the Amended Complaint does not state a claim for gender based harassment under Title VII because Plaintiff has failed to plead facts establishing severe and pervasive harassment that altered the conditions of Plaintiff's employment. Moreover, the Amended Complaint fails to allege facts which establish a basis for entity liability for gender based hostile work environment harassment.

¹Count IV does not specify the basis for the alleged discrimination.

(c) Count II of the Amended Complaint fails to state a claim upon which relief can be granted because there is no allegation as to the basis for the discrimination and because many of the claims are time barred.

(d) Count III of the Amended Complaint does not state a claim upon which relief can be granted because Plaintiff fails to allege facts establishing a prima facie case of discrimination under the Age Discrimination in Employment Act (ADEA).

(e) Count IV of the Amended Complaint does not state a claim upon which relief can be granted because Plaintiff fails to allege a prima facie case of discrimination under title VII.

4. In the alternative, Defendant School Board submits that the Complaint is vague and ambiguous as to the nature of the cause(s) of action and the factual allegations in support of each count such that a more definite statement is necessary for Defendant to adequately frame a response.

WHEREFORE, Defendant School Board requests that the court enter an Order dismissing Plaintiff's Amended Complaint for failure to state claims upon which relief can be granted or, in the alternative enter an Order for a more definite statement for the reasons set forth above and as more fully set forth in the following memorandum of law.

MEMORANDUM OF LAW

Defendant School Board construes the Complaint to allege four counts. Plaintiff attempts to state causes of action based upon (1) Harassment under Title VII; (2) Disparate Pay under Title VII, the Equal Pay Act and the Fair Labor Standards Act; (3) Discrimination under the ADEA; and (4) Discrimination under Title VII.

The Amended Complaint suffers from many of the same pleading defects evidenced in the original Complaint [DE 1] which resulted in the Court's entry of an Order Dismissing the Complaint

for failure to state claim upon which relief can be granted [DE 30]. The Amended Complaint constitutes a shot gun pleading and contains numerous factual and legal allegations that are not associated with any of the counts delineated in paragraphs 18a-d. The Amended Complaint does not clearly set forth the legal basis for each of the four counts and combines multiple theories of recovery under single counts. Defendant has attempted to discern the legal basis for each of the Counts identified in the Amended Complaint.

The Amended Complaint contains several factual allegations of discrimination which are time barred under Title VII and the ADEA. It is well settled that alleged acts of discrimination are only actionable if they occurred within three hundred (300) days of the charge of discrimination. See Hull v. Case Corporation, 1993 U.S. Dist. LEXIS 21164 (S.D. Fla. December 13, 1993) (Title VII); Salazar v. American Tel. & Tel. Co., 715 F.Supp 351 (S.D. Fla. May 30, 1989) (ADEA). Moreover, the Complaint fails to allege sufficient facts to establish a prima facie case as to any of Plaintiff's theories of recovery.

A. Hostile Work Environment Harassment under Title VII.

The claim for harassment under Title VII is deficient because Plaintiff fails to plead facts which establish conduct on the part of defendant that is severe or pervasive enough to create a Title VII violation. "Conduct that is not severe or pervasive enough to create an objectively hostile or abusive work environment—an environment that a reasonable person would find hostile or abusive - - is beyond Title VII's purview." Harris v. Forklift Systems, Inc., 510 US 17, 21-22 (1993). Here, Plaintiff has alleged that she "rejected inappropriate touching" and a "prohibited physical act" in the context of being asked to leave a local high school. See Complaint ¶ 18(a). The Amended Complaint fails to allege the exact nature of the "prohibited physical act" and the "inappropriate

touching.” However, the Amended Complaint establishes that Plaintiff is premising her Title VII harassment claim on a single incident that occurred on April 16, 2010. Thus, the Amended Complaint fails to establish a severe and pervasive objectively hostile or abuse work environment. “To survive a motion to dismiss, a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face’” Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009) (internal citation omitted).

The Title VII harassment claim is likewise defective because the Amended Complaint fails to allege sufficient facts to establish liability on the part of Defendant, School Board. “In order to establish a prima facie case for hostile work environment, Plaintiff must not only show that severe or pervasive discrimination created an abusive working environment, but also that Defendant’s are vicariously or directly liability for such environment.” Pelt-Washington v. Fresenius Medical Care AG, FMC Holding’s Inc., 2007 U.S. Dist. LEXIS 36466, * 25 (N.D. Fla. May 17, 2007). Here, Plaintiff asserts that she was harassed on one occasion by “school employees.” See Complaint at ¶ 18(a). The Amended Complaint fails to identify the school employees as supervisors with authority over Plaintiff or otherwise plead facts consistent with entity liability. Accordingly, the Amended Complaint fails to establish Defendant’s liability for harassment under Title VII. See Faragher v. City of Boca Raton, 524 U.S. 775, 806 (1998) (“An employer is subject to vicarious liability to a victimized employee for an actionable hostile environment created by a supervisor with immediate (or successively higher) authority over the employee”).

B. Disparate Pay

Count II of the Amended Complaint does not state a claim upon which relief can be granted because Plaintiff has failed to plead facts establishing a prima facie case for disparate pay under Title

VII. “To establish a prima facie case of disparate pay, Plaintiff must show that he occupies a job similar to that of higher paid persons who are not members of his protected class.” Nicholas v. Board of Trustees of the University of Alabama, 251 Fed. Appx. 637 (11th Cir. 2007). The Amended Complaint fails to establish Plaintiff’s protected class or otherwise allege the basis for discrimination as to Count II. Plaintiff has not pled that she was paid less because of her race, gender, religion or national origin. The Amended Complaint also fails to establish that Plaintiff occupied a job similar to higher paid persons. “Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice. Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009) (internal citation omitted). Furthermore, to the extent that Plaintiff is alleging disparate pay based upon discrimination that occurred more than three hundred days prior to the charge of discrimination, such claims are time barred. See Gray v. Vestavia Hills Board of Education, 317 Fed. Appx. 898 (11th Cir 2008).

Count II of the Amended Complaint fails to state a claim upon which relief can be granted because Plaintiff has not established a prima facie case under the Equal Pay Act. “To establish a prima facie case under the Equal Pay Act of 1963, 29 U.S.C. § 206(d), a complainant ‘must show that an employer pays different wages to employees of opposite sexes ‘for equal work on jobs the performance of which requires equal skill, effort, and responsibility, and which are performed under similar working conditions.’” Wu v. Thomas, 847 F.2d 1480, 1485 (11th Cir. 1988) (internal citation omitted). In this case, the Amended Complaint fails to allege that Defendant paid different wages for equal work on jobs that require equal skill, effort and responsibility, and which are performed under similar working conditions to persons outside Plaintiff’s protected class. Simply stated, the Amended Complaint fails “to state claim for relief that is plausible on its face.” Bell Atlantic Corp.

v. Twombly, 550 U.S. 544, 570 (2007).

To the extent that Count II attempts to allege a claim for violation of the fair labor standards act (FLSA), that claim also fails. The FLSA only applies to disputes related to overtime pay. Count II fails as a matter of law because Plaintiff asserts three causes of action in a single count, contrary to the requirements of Rule 10(b) of the Federal Rules of Civil Procedure.

C. ADEA

Count III of the Amended Complaint fails to state a claim upon which relief can be granted because Plaintiff has not pled facts establishing a prima facie case of discrimination under the ADEA. “In an ADEA case involving discharge, demotion, or failure to hire, a plaintiff may establish a prima facie case by showing: (1) that he was a member of the protected group of persons between the ages of forty and seventy; (2) that he was subject to adverse employment action; (3) that a substantially younger person filled the position that he sought or from which he was discharged; and (4) that he was qualified to do the job for which he was rejected.” Turlington v. Atlanta Gas Light Co., 135 F.3d 1428 (11th Cir. 1998). Here, the Amended Complaint fails to allege an adverse employment action. Rather, Plaintiff has alleged that she was asked to leave a job fair on October 5, 2010. Plaintiff fails to allege that she applied for a position and was rejected and there are no other allegations which demonstrate an adverse employment action as would be necessary to maintain a claim for discrimination under the ADEA. Count III also fails to allege facts establishing that a substantially younger person filled the position Plaintiff sought or that Plaintiff was qualified to do a job for which she was rejected.

D. Discrimination under Title VII.

Count IV of the Amended Complaint does not state a claim upon which relief can be granted for discrimination under Title VII because Plaintiff has failed to plead facts establishing a prima facie case. Moreover, the claim for discrimination based upon Plaintiff's demotion at Deerfield Beach Middle School in the 2005-2006 school year is barred by the statute of limitations.

"In the absence of direct evidence, an action for sex discrimination under Title VII must allege facts which demonstrate the following elements: (I) membership in a protected class, (ii) qualification for the job (iii) termination or other adverse employment action, and (iv) replacement by a person outside the protected class" Hyde v. Storelink Retail Group, 2007 U.S. Dist. LEXIS 45667, 5 (M.D. Fla. June 25, 2007) (citation omitted). Count IV fails to identify Plaintiff as a member of a protected class for purposes of the Title VII discrimination claim. Plaintiff has not indicated whether the alleged Title VII discrimination claim is based upon race, color, religion, sex or national origin. Plaintiff has likewise failed to plead in Count IV that she is qualified for the job as a school teacher. Accordingly, the Title VII discrimination claim is defective as a matter of law and must be dismissed.

The Amended Complaint alleges that Plaintiff was removed from her position as a full time teacher at Deerfield Beach Middle School after one semester during the 2005-2006 school year. See Complaint ¶ 7. The Amended Complaint establishes that the charge of discrimination was filed on February 1, 2011. See Complaint Exhibit A-2. Thus, any alleged discriminatory acts that occurred prior to April 7, 2010, are barred by the three hundred (300) day statute of limitations.

Alternatively, Defendant School Board requests that the Court enter an Order for a more definite statement based upon Plaintiff's failure to plead sufficient facts with regard to prima facie elements of each of the causes of action identified in the Complaint.

WHEREFORE, based upon the foregoing argument and authority, Defendant School Board respectfully requests that the Court enter an Order Dismissing the Complaint for failure to state a claim upon which relief can be granted. Alternatively, Defendant School board requests that the Court enter an Order for a More Definite Statement as to the factual allegations in support of Plaintiff's claims.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May, 2012, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I further certify that I either mailed the foregoing document and the Notice of Electronic Filing by first class mail to any non CM/ECF participants and/or the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF to any and all active CM/ECF participants.

JOHNSON, ANSELMO, MURDOCH,
BURKE, PIPER & HOCHMAN, P.A.
Attorneys for Defendant
2455 East Sunrise Boulevard, Suite 1000
Fort Lauderdale, FL 33304
954/463-0100 Telephone
954/463-2444 Facsimile
burke@jambg.com

BY: /s/Michael T. Burke
MICHAEL T. BURKE
Florida Bar No. 338771

SERVICE LIST

Pro Se Plaintiff

Nasra M. Arafat

P.O. Box 772177

Coral Springs, FL 33077

MICHAEL T. BURKE, ESQ.

JOHNSON, ANSELMO, MURDOCH,

BURKE, PIPER & HOCHMAN, PA

Attorneys for Defendant

2455 E. Sunrise Blvd., Suite 1000

Fort Lauderdale, FL 33304

burke@jambg.com

(954) 463-0100 (Phone)

(954) 463-2444 (Fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-62525- CIV - DIMITROULEAS / SNOW

Nasra M. Arafat
(pervious married Ibarhim .
Plaintiff,

Vs.

School Board Broward County (Broward.
County Public Schools)
Respondent,

FILED BY [Signature]
2012 MAY 21 AM 11:43
CLERK U.S. DISTRICT
COURT
S.D. OF FLA-FIL

Plaintiff's Response And Opposing Memorandum Of Law On Defendant's Motion To Dismiss Amended Complaint Or In The Alternative Motion for More Definite Statement

Plaintiff, Nasra M. Arafat pro se files this motion to response to Defendant's, School Board Broward County Motion to Dismiss pursuant to Local Rule 7.1 (a)(3), 7.1(c)(1)(A) and 7.1(c)(2) and as a ground plaintiff stated the following:

1. Defendant's motion ¶1 regarding plaintiff work as substitute teacher described as periodically since 2000/2001 is inaccurate. Plaintiff did work as full time hours since she started till 2006/2007 school year then because of plaintiff's circumstances due to car accident since this date plaintiff worked less hours based on her ability after car accident when she has sole choice to accept work or not and which school and to set her work schedule. Plaintiff was able to maintain reasonable hours during her recovery by choosing the schools who most of students well behave also high schools need less concern and responsibility. In addition plaintiff did seek medical care outside the country for about five (4) months during the summer of 2008 and 2009 based on official unavailability notice to her employer as courtesy which not required in such

position .

2. But on the beginning of 2009 year defendant intentionally and severally reduced plaintiff's hours after plaintiff changes her married name on Oct. 08,2008 by court order from Ibrahim to her father name Arafat as indicated in her B.S. degree transcripts evaluation for Egypt degree. Here the contrast W-2 form for 2008 as income \$10,339.21 up to ten (10) thousands dollars exhibit A1and W-2 form for 2009 as income \$2,868.43 less than three (3) thousand dollars exhibit A2. Defendant's motion full with wrongfully content on contrary to all facts including memorandum of law including law cases to support information and not exist in plaintiff's amended complaint. Plaintiff will not be able to explained each one with evidences as above example other wise she will be leading to directly violated of FRCP, rule 7.1(c)(2) rather plaintiff will focused on necessary facts as opposition on defendant's arguments through plaintiff's memorandum of law by following points:

3. Defendant failed to identified which claims alleging discrimination time barred and occurred more than (300) three hundreds days, defendants' motion ¶ 3 (a). Defendant asserted same thing again in defendant's introduction memorandum of law in 3rd paragraph as stated that "the charge was filed on Feb. 01,2011; thus any alleged discriminatory acts occurred prior to April 07,2010 are bared. But materials facts reported by plaintiff on contrary while all relevant counts timely filed. Defendant did relay on set of serial similar actions asserted discriminatory acts since 2005/2006 for demotion and for termination on April 28, 2010 school year. While plaintiff in need to show more when defendant similar acts to inhibit plaintiff's career growth, unequal treatment, unequal pay started and continued till the last day she was active employee. Defendant choice old date to determined time barred claim which asserted to show similar pervious recent acts when plaintiff also worked over time on 2005/2006 as a teacher but never

get pay for it while unequal pay and denied standards salary or promotion still stand as was constant since 2005/2006 {which was plaintiff graduations dated which delay because of car accident on 2006} till termination on April 28,2010.

4. These relevant claims followed by supported additional sufficient set of facts and claims more details. In addition to other essential facts asserted with each count as clearly indicated in amended complaint ¶ 18 and ¶ 19. Therefore demotion on 2005/2006 school year asserted to described and to support pervious facts as relevant element in the case under Title VII which on contrary to defendant's motion memorandum of law ¶ "D. Discrimination under Title VII ". in order to comply with Federal Rule Of Civil Procedure FRCP. It was the best style to organized critical and long information together to avoid any defect and lengthy compliant. In addition plaintiff case and the risk she did take was because she refused to compromised and attempted to eliminate the side effect of defendant's action not only on her career but because will impact innocent children's welfare.

5. Defendant admitted in his motion for first appearance [DE 16]based on original complaint that plaintiff in title for relief but was lengthy and other defect which eliminated. Furthermore plaintiff must comply with Federal Rules of Civil Procedures FRCP and avoid any defect based on many of higher courts analysis and opinions and this court order [DE 32].

Defendant argument was on contrary to plaintiff pleading towards her qualifications which identified her tasks and responsibility which was for two different positions as she asserted more responsibilities outside the class room and involving in children's grades and other activities. Also identified all her degrees plus teacher certification in shortage subject area in education describing her duty as listed in amended complaint ¶ 6 and ¶ 7 although all some of these facts listed once or twice in separate area but related to all counts listed in plaintiff amended legible,

and clear compliant ¶ 18 and ¶ 19.

6. These true allegations for assorted claims committed by several employees against one plaintiff due to the nature of the position which visiting all Broward County Public Middle and High Schools and related to one set of facts for constant characteristic and qualifications related to one plaintiff. Plaintiff avoided to repeat this same data more than once with other variable data all exist in this case history. It will be impossible to asserted more details to establish prima facie pleading for variable allegations occurred on April 2010 and after which our case here; with regard to more details to indicate full history started back to 2005/2006 school year and to satisfied all rules and higher courts opinions. These pervious allegations (false evaluations) was time barred and was false and dissolved based on plaintiff's response but defendant included them in his analysis to replacement other similar recent evaluations occurred shortly before termination on April 28,2010 and other claims which all filed timely. Therefore all plaintiff's relevant recent counts timely filed. Plaintiff pleading formula avoided the defect of original compliant by not repeating the same one set constant facts as asserted about plaintiff's qualifications, education, experiences, certification as well as task and responsibility which for two different positions with each allegation and claim. The amended complaint can't be plead in other way without violation of Federal Rule Of Civil Procedures , FRCP nor lengthy compliant will be avoided.

7. The same application applied when the suit was filed based on different basis of law and discriminatory acts based upon many of assumptions reasons except count I for harassment and age discrimination count III ADEA under Title VII ¶ 18(a) and ¶ (c) ; when employees stated the reasons as was clearly separate identical direct statements with actions which constitute plaintiff's claims. But all other acts could be based on most of all reasons as indicated in

plaintiff's complaint ¶ 12 and ¶ 17. Also listed in attached exhibits to amended complaint for EEOC local office charge and form content and decision as explained in amended complaint ¶ 12, ¶ 13, ¶ 14 and ¶ 15 as short clear statement. Defendant argued also for additional pleading while all necessary details exist as reported carefully and adequately to support major counts as listed in another category as supported claims and facts. These facts defendant disputed sufficiently exist amended complaint ¶ 19 [1][2] and [3] which supported all separate four (4) counts especially counts II, III, and IV ¶ 18(b),(c) and (d).

8. Defendant's motion in general in all pages argued for same thing over and over again which argued that plaintiff failed to plead more details, sever persuasive to establish prima facie which on contrary to many of law cases which has same criteria on discrimination employments cases. Also on contrary to the rules provisions which amended by supreme court on 2007 and after as the court stated that: [In *Twombly*, the Supreme Court emphasized a complaint "requires more than labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do." *Twombly*, 550 U.S. at 555, 127 S. Ct. at 1965. **Factual allegations in a complaint need not be detailed but "must be enough to raise a right to relief** above the speculative level on the assumption that all the allegations in the complaint are true (even if doubtful in fact)." *Id.* at 555, 127 S. Ct. at 1964-65 (internal citations and emphasis omitted)]. Furthermore (As amended Apr. 30, 2007, eff. Dec. 1, 2007.), according to Notes of Advisory Committee on Rules—1937 as concluded and stated that: ["Committee Notes on Rules—2007 Amendment " The language of Rule 10 has been amended as part of the general restyling of the Civil Rules to make them more easily understood and to make style and terminology consistent throughout the rules].

9. Here, again defendant's motion memorandum of law ¶ C. ADEA on contrary to the facts

asserted in broad detail in original compliant also standards and sufficient in amended compliant as follow:

(a) Defendant stated that: "plaintiff failed to allege that she applied for a position and was rejected" but the facts asserted was different because of the school board did not proceed hiring this way as asserted in plaintiff's compliant ¶ 18(c) Count III while plaintiff plead necessary facts to show why there was no application to be fill in first place as she stated that: plaintiff wasn't able to fill just forms included this application as defendant appointed their rules involving active employees. Also before termination defendant asked her to leave the district when she was active employee when she went to check on her request status for her new position dated Jan. 02,2010 to superintendent.

(b) Defendant prevented plaintiff from attending job fair which has different design on Oct.05,2010 when all process for application, interview, finger prints, and all other requirements must be completed on same this day. Plaintiff didn't hesitate to get other position during the job fair and still related to science if what she requested impossible in curriculum development. These types of positions offered as promotion given by defendant when active employees updated their educations while my classmate informed me after he got his promotion.

10. Plaintiff also can only assume that other claims for defendant discriminatory acts was based upon Plaintiff's age, religion, marital status, race, national origin and sex as reported clearly in plaintiff's complaint ¶ 17. Plaintiff attempted to add Marital Status because the person can be belong to same religion, national origin and race but other personal bases can be also exist as being a single or because just because divorced women. The supervisor Rocklemen clearly stated that she want to hire fresh graduate which Count III under Title VII for claim based on age discrimination while the job fair full with up to one thousands, 1000.00 people all

ages. Therefore the supervisor / Rocklemen could be discriminated me based on additional reasons may be because of plaintiff's cloth with a scarf but she didn't say that directly then the discriminatory act will not based upon age alone but will include additional reasons on basis of law. Other acts similar to evaluator who wrote officially that " I don't want Arafat to work or be assigned to school in future because "she is not a good match" while not exactly known which basis was targeted plaintiff; may be all of them.

11. Plaintiff identified two discrimination acts based upon clear statements by employees which under Title VII for harassment and age discrimination ADEA when employee verbally and directly expressed their acts by word or by unethical touching. Furthermore they administrate their action practically by enforcing plaintiff to leave her job and job fair. But other claims which may be occurred based upon to all bases as listed in amended complaint ¶ 17 for Plaintiff's age, religion, marital status, race, national origin and sex which all clearly asserted sufficient facts as employees formal and informal actions indicated. What defendant looking for is exist in stylish formula to avoid the defect of original compliant. In order for plaintiff's to confirm the exact element to indicate on which bases the discriminatory act occurred in some claims is by asking these employees personally through subpoena and questioning them to know what these employees means by words match or different culture; or why you telling me that {you looking for fresh graduate } which means younger people while the fair has all ages?. Therefore it could be extra reasons may be considered as marital status, national origin and religion beside age discriminations.

12. Defendant's motion asserted that plaintiff not alleged facts establishing that a substantially younger person for promotion. Plaintiff clearly indicated same exact words listed in defendant's motion and more than that but in another spot see ¶ 18(b) last two statements as

plaintiff stated that “ which given to males and younger employees or given to other based on illegal basis when plaintiff has equal right on basis of Fair Labor Standard Act FLSA and as amended equal pay Act of 1963 EPA”. Plaintiff want to put similarity together as set of facts when she did work over time as a teacher on 2005/2006 but not awarded with neither one for over time during this time nor with reasonable pay / or promoted for better position till the last day as she worked on April 28,2010 which can be confirmed through discovery and trial.

13. Defendant’s motion ¶ 3 (a) and introduction of Memorandum Of Law defendant attempted repeatedly to mention an issue not exist as follow:

(a) Defendant asserted that: “ many allegations in several pages are time barred without accurate identification for it. Although these allegations not exist as above example but defendant attempted to supporting his argument with many of law cases while such issues not exist. There is no such theory can be proven if defendant carefully review the amended complaint to see that there is separate factual allegations supported with following material facts as listed in amended complaint ¶ 18, and ¶ 19[1][2]and [3] which connected directly with one another to conclude this case with extraordinary true allegations within standards specified pleading within asserted legal opinions and according to FRCP, rule 10.(b)(c).

(b) It was necessary to asserted such history of unequal pay all the time, demotion on 2005/2006 then termination on April 28,2010 shortly after plaintiff attempted to make change after long years as slavery using plaintiff to teach and as advisor when schools asked plaintiff to fill recommendation form every day which provided based research, experiences and higher education studies including Global Educational Conferences and Scientific Organizations. These recommendation made many changes after many schools was going to close after straight F for more than two years according to department of education regulation of the state. Plaintiff

attempted to show different dates and actions on same matter of law related to both salary and position. While plaintiff long time employment considered over time without pay in this case. Plaintiff asserted such full history briefly since 2000/2001 school year till the day of termination on April 28,201 when she worked in same day of termination at Renaissance Middle School with almost same salary which constitute violation of standards of Equal Pay Act based upon national origin, race and religion. Plaintiff claimed in amended compliant that such pay was less than others who doing same task with same responsibility under same position see amended compliant ¶ 18(b), Count II.

(c) Defendant want plaintiff to plead his exact words as (less pay) than other who are doing same tasks under same work condition} while plaintiff used numbers to compare between higher salary and her salary as \$ 10.57 an hours for same position, task and responsibility; of course \$10.57 less than \$15.00 and \$ 25.00 an hour as reported with detailed in amended compliant ¶ 18(b) for equal pay Act of 1963 EPA count II. Plaintiff also added that these employees who has same position less qualifications and educations. The dates for demotion as 2005/2006 while there was unpaid overtime which listed to indicate slavery history when plaintiff worked overtime and no pay but school provided instead certificate for perfect attendance. These facts was to indicated defendants ignorance for federal rules in order to support this case to over come any problem which certainly can impact innocent children future. Therefore defendant's motion was unnecessary to be filed after amended compliant.

14. Defendant argued to assert more details to show how wrongdoers acts impacted plaintiff was inaccurate when plaintiff claimed sufficient facts how her career and entire life impacted and how she did suffer as a result of her employer negligence to response and to proceed with policies, law see amended complaint ¶ 20 (a)-(k) which on contrary to defendant's motion.

Amended compliant nine (9) pages categorized to meet most of requirements of rules on the light of this court order [DE 32] on in order to survive dismissal discrimination employment case. Except for count I and count III under title VII for harassment and age discrimination as wrongdoer directed clear discriminatory statements why plaintiff can't work or fill an application as explained earlier in this motion ¶ 10 and ¶ 11.

15. Defendant / employees admitted their wrong unethical acts for some claims through their formal and informal action as some stated in their E -mail that “ I learned that I can stop sub-teacher form work if I want ... ” **exhibit A1**. Other employees abused the system, position power and polices to make illegal offer as \$15.00 and \$25.00 an hour for unqualified sub-teachers. Also some schools wrote negative evaluations while plaintiff didn't work in their school **exhibit A 2** .

16. Defendant argued regarding Title VII that the facts provided not enough and asserted that: “ more detailed and to establish conduct on part of defendant that is sever or pervasive enough, should be given regarding Count 1 for Title VII, defendant said. Defendant specify the need to show how inappropriate touching done defendant memorandum of law ¶ A. “Hostile Environment under Title VII”. The improper touch explained with all detail about what the employee / wrongdoer did exactly to defendant's lawyer on April 16,2010 during first and only conference on February 24,2012. In addition Plaintiff was with compliance with FRCP, FRCP 15. (b)(2) after plaintiff explained before and asserted in police report clearly exhibit A27-A29 original complaint sufficient in amended compliant¶18(a). Defendant continued to argued for more details to know how inappropriate touching done to establish a prima facie.

17. Plaintiff's pleadings for true allegations was sufficient in existence of tangible evidences and with compliance to FRCP, rule 8(a)(2) with regard to other need to report more essential facts to support what the plaintiff experienced and on which ground her claims rest also to satisfy

standards pleading see Conley V. Gibson as the court stated that: [“complaint can dismissed if appear beyond doubt that plaintiff can prove no set of facts which would initial him for relief. Also court stated that “Factual allegation must be enough to raise a right to relief above the speculative level”] plus more supported law cases below under memorandum of law.

18. Defendant Memorandum Of Law ¶ A argued in defendant’s motion last paragraph that: “plaintiff failed to identified the school employees as supervisors with authority over plaintiff or otherwise plead facts consistent with entity liability. Plaintiff clearly identified defendant as school board who are liable for these all acts which has authority over both these employees and plaintiff while such authority reported in different places as one set cover all relevant counts in amended complaint ¶4, ¶ 5, ¶ 10, ¶11, ¶18 (d) count IV and ¶19[1]. The key factor in this case that plaintiff worked with school board who has authority over all the entire schools employees and their own supervisors including substitute teachers. Plaintiff again in another category identified all names and responsibilities about wrongdoers and their supervisors’ names even listed sub -coordinators/ evaluator education level according to the best of my knowledge.

19. Defendant argued that plaintiff failed to identified parsons and other issues which it can’t be without discovery which not completed yet as follow:

(a) Defendant didn’t proceed proper investigation to know more about wrongdoer when school board failed even to apply simple rules of board policy # 4101. In addition some information can’t be pleaded rather will be use as evidences while there is extra evidences which different content than what attached as exhibits to original compliant. It is impossible to know the complete fact about the identify of the wrongdoer while the employee name / Mclomore as listed in police report for his unethical action on April 16,2010 for count I under Title VII. There is no any information listed about this employee as all in the recent discovery by defendant

after plaintiff requested under Rule 26(a) (1).

(b) There was two different evaluations on same day April 16,2010 related to count I at North East High School which made two different evaluations one of them claimed plaintiff's performance while plaintiff didn't enter the classroom or communicated with any body in first place which subpoena can be use. Other schools West Broward High Schools made also two evaluations one of them by the principal on Dec. 05,2008 while the wrongdoer different persons and title. When plaintiff was responded officially and requested meeting with them when the facts completely different as detailed in original compliant and pleaded briefly in amended compliant see ¶ 19[3](d) although these evaluations time barred but my response is essential in this case to be disclose as evidences which not attached to original complaint. Other evaluations on 2002 and on 2006 when plaintiff didn't work ever with them but all these evaluations old and new considered for termination on April 28,2010 also their names and address listed on defendant's discovery. Plaintiff working in this issue to set schedule in person to follow the process in order to complete timely discovery and to prepare for pretrial conferences Local Rule 16.1 (b)(6)to avoid unnecessary arguments and request through frivolous motions if parties couldn't reach reasonable and fair settlement **exhibit A3**.

(c) Also two names presented individually as witness in defendant's discovery documents for North East High School regarding count I for Title VII harassment one for the principal / William the other title for employee never known to plaintiff as / Jan Westrvelt. Furthermore may be the evaluations forms filled on April 16,2012 by him who checked box for [unsatisfactory performance]; but plaintiff didn't know this evaluator because plaintiff went home before knowing where the class room is nor plaintiff performed any thing while she went home. The 2nd one by principal / William which all considered for recent negative six evaluations

The employee who committed unethical act one of three men involved in April 16,2010 act which all have no I.D. and 2nd employee, the principal / William who send me home but nothing about 2nd employee / Mclomore the 2nd , the third may be he is one who wrote 2nd negative evaluation and claimed my performance while there was no performance. If the unknown employee so fare just showed me the classroom as many schools does in ethical way may be the other employee will not react by sending me home and plaintiff will not be terminated rather be promoted.

20. Defendant repeatedly asserted same issue again that plaintiff failed to plead more facts in order to establish prima facie, while the pleading has sufficient supported facts and other essential elements enough to warranted reasonable and fair relief in amended compliant ¶ 18 for count I Title VII of the Civil Rights Act of 1964. In addition to count III in violation of the Age Discrimination in Employment Act of 1967 (ADEA) with following support facts ¶19. The case considered essential matter in education as extraordinary circumstances involved due to the nature of plaintiff's position which she did used it as researcher and as a detective to answer a huge hypothesis to complete her two projects and on other aspect.

21. Count 1 and count III under Title VII for both harassment and age discrimination ADEA was timely, based on true allegation because of: (1) improper touching on April 16,2010 (2) plaintiff enforced to go home or to leave job fair (3) indicated names, times and places and police report. There was no investigation process done and discovery not yet completed to know the employees' full names, address and title which not listed in the five (5) pages discovery which filed by defendant on April 5th 2012 under rule 26 and its subdivisions while Rule 26(a)(1) incomplete and the rest of its subdivisions not yet done. While more details and data will confirm defendant liability for more than what listed so fare.

Plaintiff immediately informed defendant about the impotence of this data which she did not yet

disclosed nor entire discovery is completed yet exhibit A3.

22. Defendant's motion ¶ B. "disparate pay " defendant argued that Plaintiff should use his chosen words to replacement task beside responsibility which was enough and equivalent to his words see count III, ¶ 18 (c). Defendant argued that his words to be asserted instead. Also plaintiff did used numbers to compare towards salaries to indicate how her salary was embarrassing was as \$10.67 an hour till 2008 become \$11.27 as corrected which almost the same till April 28,2010 while defendant want to use less than as words instead of numbers while was clearly identified see amended compliant ¶18 (b) for count II. Defendant's action caused many other difficulties and violation of law when same day plaintiff was terminated it was same day she was working therefore payroll department couldn't handle payment with existence of termination in same date.

23. Plaintiff complied with all rules for standards pleadings to survive defendant motion pursuant to FRCP, rule 12(b)(6) even so still defendant argument not supported by any legible reasons also defendant's arguments on contrary to higher court opinions as follow:

(a) Plaintiff's pleadings formula supported by Justice Thomas decision as stated that: [" the prima facie case operates as a flexible evidentiary standard and not a pleading requirement for discrimination cases"]. Also see supreme court opinion, Oral Argument for , Akos Swierkiewicz v. Sormea. According to Supreme by Justice Clarence Thomas, as stated that: {" the Court held that an employment discrimination complaint need not include specific facts establishing a prima facie case under the framework of McDonnell Douglas Corp. v. Green and instead must contain only "a short and plain statement of the claim showing that the pleader is entitled to relief,"} pursuant to Rule 8(a)(2) of the Federal Rules of Civil Procedure. "complaint must plead a prima facie case of discrimination, even though discovery might uncover such direct evidence," wrote

Justice Thomas. "It thus seems incongruous to require a plaintiff, in order to survive a motion to dismiss, to plead more facts than he may ultimately need to prove to succeed on the merits if direct evidence of discrimination is discovered."} Here is the plaintiff amended complaint with many of identical claims for true allegations with supported facts and claims assorted sufficient elements to overcome a Rule 12(b)(6) motion to dismiss.

(b) Plaintiff was careful to not to plead broad evidences not only to avoid lengthy amended complaint but also not proper to plead evidences see oral argument for Akos Swierkiewicz v. Sormea .

These facts with a broad details through discovery within tangible evidence will confirm all these true allegations wrote by wrongdoer themselves. Plaintiff's compliant supported by supreme court opinion as stated that { to survive a motion to dismiss, a complaint "must contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face," id. at 1949 }.

Memorandum Of law

Plaintiff's amended complaint complied with standards pleading requirements as follow:

A. Identical claims exist

Defendant argued that the four counts for count (I) harassment under Title VII, count (II) Equal Pay Act and Fair Labor Standards Act, count (III) under Title VII age Discrimination ADEA. And count IV for termination of employment and inhibit career growth based upon age, national origin, marital status, race and religion. Plaintiff's pleading ¶ 16, ¶17, ¶18, ¶ 19, and ¶20 reflected organized formula with consistent category connected to each other to present a true allegations for sever discriminatory acts which constitute reasonable relief. Amended compliant delivered direct short statement with each claim supported with essential and enough set of facts

according to Federal Rules Of Civil Procedures, FRCP rule 8, rule, 10.(b)(c) and this court order [DE 32] which was enough to warranted defendant about plaintiff entitlement for reasonable relief in employment discrimination case according to Supreme court of United States as stated in its opinion for Bell Atlantic Corporation v. William Twombly ET AL. the Supreme Court sated that “ Justice Black.s opinion for the Court in Conley v. Gibson spoke not only of the need for fair notice of the grounds for entitlement to relief but of .the accepted rule **that a complaint should not be dismissed for failure to state a claim unless it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.. 355 U. S., at 45.46”.**

In addition to other facts which about to confirm assorted discriminatory acts which can be discover later and use for trail purpose as tangible evidences see Swierkiewicz v. Sorema N. A., 534 U. S. 506, 508 (2002).

B. Standards length of complaint

Plaintiff complied with pleading standards in nine (9) pages with adequate facts with essential enough deatials as supported by higher court opinion According to analysis by Gibbons legal research, The Supreme Court Confirms Application of Twombly's Heightened Pleading Standard to All Civil Matters Which stated that: {“in Conley v. Gibson, 355 U.S. 41, 45-46 (1957), that before granting dismissal of a complaint at the pleading stage, a district court must find “beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.”}. In Twombly, the Supreme Court declared that: {although “a complaint attacked by a Rule 12(b)(6) motion to dismiss does not need detailed factual allegations, a plaintiff's obligation to provide the grounds of his entitle[ment] to relief requires more than labels and conclusions, and a formulaic recitation of the elements of a cause of action

will not do.” 550 U.S. at 555. Merely stating the theory of the claim will not suffice. *Id.* at 561}. therefore plaintiff focused to satisfied both elements through categorized pleading uniform.

C. **Defendant admission towards plaintiff entitlement for relief**

Defendant was simply admitted in defendant first appearance through the motion for extension of time [DE 16] ¶ 5 that “ the matter stated herein constitute good case to grant the relief herein requested ”. Defendant’s decision was on basis of the plaintiff’s original complaint. Defendant’s admission was simply indicated that the Federal Law Of Equal Employment was severely violated and plaintiff has severely suffer results of defendant’s assorted actions. Therefore avoid unwanted defect and formulated plaintiff’s true allegations according to analysis of many of law cases and courts opinions was considered.

Plaintiff asserted consequential set of facts which adequate enough details as required to survive defendant’s motion to dismiss

D. Existence of essential sufficient facts which disputed defendant’s opinion

Defendant’s argued on ¶ 3 (b) and memorandum of law ¶ A. for Count 1 Title VII and following pages towards all allegations that plaintiff need to plead more facts to establish sever and pervasive harassment to establish prima Facie and failed to state claim which on contrary to amended compliant content which supported by law cases as listed below. The law cases in defendant’s motion inapplicable and not reflected the facts exist in plaintiff’s compliant count I ¶ 18(a) and count III ¶ 18(c) under Title VII and the rest of compliant. Plaintiff’s amended complaint ¶ 18 and following facts ¶ 19 asserted sufficient adequate set of facts with indication to what occurred, the times, places, persons and their statements and actions which asking plaintiff to go home at 7:40 am. Pleading more details to establishing sever and pervasive harassment will lead to lengthy pleading which was dismissed as violation of Federal Rules Of

Civil Procedures FRCP for standards pleadings and for clarity. Therefore plaintiff's sufficient set of facts with enough essential details supported by many law cases according to supreme court as stated that: { " The phrase is best forgotten as an incomplete, negative gloss on an accepted pleading standard: once a claim has been stated adequately, it may be supported by showing any set of facts consistent with the allegations in the complaint. See Sanjuan, 40 F. 3d, at 251 (once a claim for relief has been stated, a plaintiff receives the benefit of imagination, so long as the hypotheses are consistent with the complaint.); accord, Swierkiewicz, 534 U. S., at 514; National Organization for Women, Inc. v. Scheidler, 510 U. S. 249, 256 (1994); H. J. Inc. v. Northwestern Bell Telephone Co., 492 U. S. 229, 249.250 (1989); Hishon v. King & Spalding, 467U. S. 69, 73 (1984)}.

D. Reasonable cause supported by higher courts

Plaintiff identified The discriminatory acts as committed through organized conspiracy. These false evaluations didn't indicate any wrong doing or any violation to any law by plaintiff who never committed nor convicted with a crime. In addition these facts for true allegations legible and sufficient to warranted defendant about the relief plaintiff seeking. Therefore defendant's motion to dismiss not supported by law cases in discrimination employment cases see McDonnell Douglas Corp. v. Green - 411 U.S. 792 (1973) the higher court sated that: {" We agree with the Court of Appeals that absence of a Commission finding of reasonable cause cannot bar suit under an appropriate section of Title VII, and that the District Judge erred in dismissing respondent's claim of racial discrimination under § 703(a)(1)". "Respondent satisfied the jurisdictional prerequisites to a federal action (i) by filing timely charges of employment discrimination with the Commission and (ii) by receiving and acting upon the Commission's statutory notice of the right to sue, 42 U.S.C. §§ 2000e-5(a) and 2000e-5(e). The Act does not restrict a complainant's right to sue to those charges as to which the Commission has made

findings of reasonable cause, and we will not engraft on the statute a requirement which may inhibit the review” court said}. While in plaintiff case EEOC indicated that defendant wasn’t in compliance with the law.

E. wrongdoer’s actions can lead defendant to what legal theories Plaintiff is pursuing

Defendant in his introduction for Memorandum Of Law argued to dismiss plaintiff’s amended compliant or In Alternative Motion For More Definite Statement as he claiming existences of shot gun pleading; also defendant stated that: plaintiff asserted allegations not associated with the four (4) counts. Here again plaintiff obligated to comply with court order (DE 32], Federal Rules Of Civil Procedures, FRCP 8(a)(2), 8(d)(1), 10(b), and many of Higher Courts Opinion for Standards Pleading especially for Discrimination Employment Cases. Plaintiff’s amended compliant integrated with many assorted facts merged with extraordinary allegations which combined assorted elements together to presented more the one case in this matter.

Therefore plaintiff asserted categorized content based on similarity of data through entire amended complaint ¶ 18 (a) and ¶ 19 [1], [2], and [3]; and ¶ 20 (a)-(k). All these facts for true allegations together easily able to survive defendant’s motion to dismiss. Plaintiff did over come the shot gun pleading was exist in original compliant. Although the shot gun not really exist but still plaintiff’s amended complaint supported by all discrimination employment law cases as an example see Defendants Planet Kids, Inc., Planet Kids at Cypress Lakes, Inc., Planet Kids II-IX, Inc., Planet Kids XII, Inc., Planet Kids XIV, Inc., Planet Kids XVI-XVII, Inc. And Manuel Sarriea “Court stated that: [“The Court begins its discussion by noting that **the proper remedy for a shotgun pleading is the alternative relief of a more definite statement under Rule 12(e), and not a motion to dismiss pursuant to Rule 12(b)(6) as sought here.** Anderson v. District Board of Trustees of Central Florida Community College, 77 F.3d 364, 366 (11th 1996). A defendant

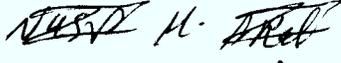
faced with a shotgun pleading “is not expected to frame a responsive pleading;” however, once a more definite statement is provided, “the defendant will be able to discern what the plaintiff is claiming [in order] to frame a responsive pleading.” Id. Significantly, in the instant action, Defendants filed an answer to each and every count of the Complaint. (DE 10.) Filing an answer suggests to this Court that it was not “virtually impossible” for Defendants “to know which allegations of fact are intended to support which claim(s) for relief.” Id. **Indeed, it is clear from the Complaint that Plaintiff is accusing Defendants of violating various intellectual property and trade practices relating to its “Your Baby Can@ products”. In other words, both the Court and Defendants can ascertain from the Complaint how Plaintiff was allegedly wronged by Defendants, what legal theories Plaintiff is pursuing and how the factual assertions play into those legal theories. As such, this is not a shotgun pleading and Defendants’ motion is denied**. This what the court asserted while plaintiff case is discrimination employment case for assorted claims.

Therefore plaintiff respectfully asking this Honorable court to deny defendant’s motion to dismiss plaintiff’s amended compliant or in the alternative motion for more definite statement.

Certification

Plaintiff, Nasra M. Arafat declare that I obligated to prepare and file my pleadings as a pro-se to the best of my knowledge and better formed after an inquiry reasonable under the circumstances: it is not being presented for any improper purpose nor to increase the cost and the time of litigation .

Respectfully submitted
This 21 day of May, 20 12.

5/21/12

Plaintiff Pro-Se / Nasra M. Arafat

Certificate of Service

I hereby certify as pro-se that a true and correct copy of the foregoing, **[Plaintiff's Response And Opposing Memorandum Of Law On Defendant's Motion To Dismiss Amended Complaint Or In The Alternative Motion for More Definite Statement]** was served with the clerk of the court and send by prove of service mail on May 21st ,2012 on all counsel or parties of record on the Service List below.

 5/21/12
Signature of plaintiff

SERVICE LIST

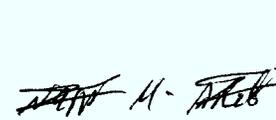
Defendant / School Board Broward County

Michael T. Burke and Damiane H. Albert Esq. / Counsel for Defendant
For/ School Board Broward County (public schools)
2455 East Sunrise Blv. Suite # 1000
Fort Lauderdale FL, 33304

And,

Omitting party / EEOC Local Office
2 South Biscayne Blv. Suite # 2700
Miami FL, 33131

Date: May 21st ,2012

 5/21/12
Nasra M. Arafat Pro-Se /plaintiff
P.O.BOX 772177
Coral Springs FL, 33077

d Control number 00029901	1 Wages, tips, other compensation 9563.78	2 Federal income tax withheld 651.61
OMB NO. 1545-0008	3 Social security wages	4 Social security tax withheld
	5 Medicare wages and tips 10339.21	6 Medicare tax withheld 149.92

c Employer's name, address and ZIP code
School Board of Broward County
7720 W. Oakland Park Blvd.
Sunrise FL 33351

7 Social security tips	8 Allocated tips	9 Advance EIC payment
10 Dependent care benefits	11 Nonqualified plans	12a
12b	12c	12d

b Employer identification number (EIN) **59-6000530** Employee's social security number **075-70-5996**

13 Statutory employee	Retirement plan	Third-party sick pay	14 Other Pension/FICA Alt 775.43
-----------------------	-----------------	----------------------	---

a Employee's name, address and ZIP code
NASRA M ARAFAT
P O BOX 772177
CORAL SPRINGS FL 33077

2008

15 State Employer's state ID No.	16 State wages, tips, etc.
17 State income tax	18 Local wages, tips, etc.
19 Local income tax	20 Locality name

W-2 Wage and Tax Statement
 Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return
 Department of the Treasury Internal Revenue Service

e Control number 00029901	1 Wages, tips, other compensation 9563.78	2 Federal income tax withheld 651.61
OMB NO. 1545-0008	3 Social security wages	4 Social security tax withheld
	5 Medicare wages and tips 10339.21	6 Medicare tax withheld 149.92

e Employer's name, address and ZIP code
School Board of Broward County
7720 W. Oakland Park Blvd.
Sunrise FL 33351

7 Social security tips	8 Allocated tips	9 Advance EIC payment
10 Dependent care benefits	11 Nonqualified plans	12a
12b	12c	12d

b Employer identification number (EIN) **59-6000530** Employee's social security number **075-70-5996**

13 Statutory employee	Retirement plan	Third-party sick pay	14 Other Pension/FICA Alt 775.43
-----------------------	-----------------	----------------------	---

2008 10/24/08

e Employee's name, address and ZIP code
NASRA M ARAFAT
P O BOX 772177
CORAL SPRINGS FL 33077

2008

15 State Employer's state ID No.	16 State wages, tips, etc.
17 State income tax	18 Local wages, tips, etc.
19 Local income tax	20 Locality name

W-2 Wage and Tax Statement
 Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return
 Department of the Treasury Internal Revenue Service

Ex. A1

1 Wages, tips, other compensation 2648.75		2 Federal income tax withheld 45.75	
3 Social security wages		4 Social security tax withheld	
5 Medicare wages and tips 2648.43		6 Medicare tax withheld 41.59	
c Employer's name, address and ZIP code School Board of Broward County 7720 W. Oakland Park Blvd. Sunrise FL 33361			
7 Social security tips	8 Allocated tips	9 Advance EIC payment	
10 Dependent care benefits	11 Nonqualified plans	12a	
12b	12c	12d	
b Employer identification number (EIN) Employee's social security number			
13 Statutory employee	Retirement plan	Third-party sick pay	14 Other Pension/FICA Alt 221.68
e Employee's name, address and ZIP code NASRA M ARAFAT P O BOX 772177 CORAL SPRINGS FL 33077			
2009	15 State Employer's state ID No.	16 State wages, tips, etc.	
W-2 Wage and Tax Statement Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return Department of the Treasury Internal Revenue Service	17 State income tax	18 Local wages, tips, etc.	
	19 Local income tax	20 Locality name	

Wages, tips, other compensation 2648.75		2 Federal income tax withheld 45.75	
3 Social security wages		4 Social security tax withheld	
5 Medicare wages and tips 2648.43		6 Medicare tax withheld 41.59	
e Employer's name, address and ZIP code School Board of Broward County 7720 W. Oakland Park Blvd. Sunrise FL 33361			
7 Social security tips	8 Allocated tips	9 Advance EIC payment	
10 Dependent care benefits	11 Nonqualified plans	12a	
12b	12c	12d	
b Employer identification number (EIN) Employee's social security number			
13 Statutory employee	Retirement plan	Third-party sick pay	14 Other Pension/FICA Alt 221.68 <i>less ≤ 2008</i>
e Employee's name, address and ZIP code NASRA M ARAFAT P O BOX 772177 CORAL SPRINGS FL 33077			
2009	15 State Employer's state ID No.	16 State wages, tips, etc.	
W-2 Wage and Tax Statement Copy 2 - To Be Filed With Employee's State, City, or Local Income Tax Return Department of the Treasury Internal Revenue Service	17 State income tax	18 Local wages, tips, etc.	
	19 Local income tax	20 Locality name	

Ex. A2

Nasra M. Arafat (p.m.n Ibrahim)
P.O.BOX 772177
Coral Springs FL. 33077

May 19,2012

Mr./ Michael Burke Esq.
For/ School Board (public schools)
2455 East Sunrise Blv.
Fort Lauderdale FL, 33304

Re: Nasra M. Arafat (pervious married Ibarhim) Vs. School Board Broward County (Public Schools) Case No. 11-62525 CV - Dimitrouleas

Request To Disclose Information And Set In Person Conference

Dear Mr./ Burke, Mr./ Allbert and associates:

Please be advised that I didn't receive yet the information I requested after I received your discovery as titled pursuant to rule 26. FRCP which filed in the court on April 05,2012 while still not reflected rule 26(a)(1) also the rest of subdivisions not completed yet.

I specified the need of employees' residences address who involved in recent actions to make sure we will be able to get them if they left their employer. Furthermore to know full information about employee name / Mclomore who involve in April 16,2010 action which not listed on discovery like wise all names even their actions back to 2002 year. The only information listed about him in the police report for his first name only. In addition I would like to get your attention that this five (5) pages discovery for employees names and their schools address not numbered pages.

My recent communication with Mr. Albert on May 16,2012 concluded as we agreed to set in person conference to review the status of the case if there possible settlement and to complete discovery. Also to settled essential points towards completion of disclosure of the content of recent filed discovery to be disclose and be ready for Pretrial Conference based on Local Rule 16.1 (b)(6). Also there was some issues Mr./ Albert claimed that he will consulted with Mr./ Burke about it; hopefully we can get an answer sooner. I will contact his secretary to make schedule and to set a neutral place for conferences may be the court to be considered if school district will not be the place.

Thank you for your time

Sincerely

5 / 19 / 12



Nasra M. Arafat m

Ex. A 3

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 11-62525-CIV-DIMITROULEAS/SNOW**

NASRA M. ARAFAT,

Plaintiff,

v.

SCHOOL BOARD OF BROWARD
COUNTY,

Defendant.

**DEFENDANT SCHOOL BOARD'S REPLY MEMORANDUM IN SUPPORT OF
MOTION TO DISMISS AMENDED COMPLAINT**

The Defendant, School Board of Broward County ("SCHOOL BOARD"), by and through its undersigned attorneys, and pursuant to Local Rule 7.1 submits its Reply Memorandum in Support of said Defendant's Motion to Dismiss Amended Complaint (DE 34) and states as follows:

COUNT I (HARASSMENT)

Count I of the Amended Complaint (DE 33 at page 4) asserts a claimed violation of Title VII arising from an incident which allegedly occurred on April 16, 2010, at 7:40 a.m. at Northeast High School. Plaintiff alleges that she was subjected to gender harassment because after being asked to leave the school, a male school district employee (Mr. McLemorre) touched her shoulder area in an effort to escort her off the premises of Northeast High School. Plaintiff Arafat correctly points out that her description of this incident is contained in an April 16, 2010 report that Plaintiff Arafat made to the Broward Sheriff's Office, a copy of which is attached to the original Complaint as A27-A29.

Taking Plaintiff's allegations as true, it is respectfully submitted that School District employees McLemorre's touching of Ms. Arafat's shoulder area on April 16, 2010, in an effort to escort her from the premises of Northeast High School, does not constitute a violation of Title VII. As a result, Count I fails to state a claim upon which relief can be granted and should be dismissed.

COUNT II (UNEQUAL PAY)

Count II of the Amended Complaint generally alleges that Plaintiff did not receive a raise during the time that she worked as a substitute teacher with the Defendant SCHOOL BOARD and that other teachers were paid a higher hourly rate. Plaintiff seeks relief for an alleged violation of the Equal Pay Act which in relevant part provides as follows:

No employer having employees subject to any provision of this section shall discriminate, within any establishment in which such employees are employed, between employees on the basis of sex by paying wages to employees in such establishment at a rate less than the rate at which he pays wages to employees of the opposite sex in such establishment for equal work on jobs the performance of which requires equal skill, effort and responsibility, and which are performed under similar working conditions... 29USC§206(d)(1).

Count II of the Amended Complaint does not allege that the salary schedules applicable to substitute or permanent teachers is based on the sex or gender of the teacher. The salary schedules applicable to substitute and temporary teachers are published on the School Board of Broward County website.¹ No colorable claim is asserted in Plaintiff's Complaint that substitute or permanent teachers within the Broward School District are paid differently based on their sex or gender.

¹The current salary schedule for full time permanent teachers can be accessed at http://www.broward.k12.fl.us/employeerelations/BTU_PDFs_for_Website/AppendixE_BTU.pdf and the current salary schedule for substitute teachers can be accessed at http://www.broward.k12.fl.us/employeerelations/SubstituteSalarySchedule_Interim0910.pdf

COUNT III (AGE DISCRIMINATION CLAIM)

Count III of the Amended Complaint alleges that the School District's Director of Instructional Staffing, Susan Rocklemen, asked Plaintiff to leave an October 5, 2010 job fair. Plaintiff's response acknowledges that the job fair was attended by 1,000 people of all ages. No plausible claim of age discrimination is asserted whereafter being utilized as a substitute teacher for an extended period of time, Plaintiff Arafat was removed from the substitute teacher list after numerous complaints from school administrators and faculty. Plaintiff's claim of age discrimination is contradicted by the numerous exhibits attached to the Complaint which document the SCHOOL BOARD's placement of Plaintiff on the do not call list for substitute teachers.

COUNT IV (REMOVAL FROM SUBSTITUTE TEACHER LIST)

The Amended Complaint fails to set forth any colorable claim that Plaintiff's removal from the approved substitute teacher list on April 28, 2010, was based on any unlawful discrimination. Indeed, the allegations of the Amended Complaint and attached exhibits document the negative evaluations and April 13, 2010, incident at Northeast High School which resulted in Plaintiff's removal from the approved substitute teacher list. The Complaint fails to set forth any allegations to show that Plaintiff's removal from the list was based on any unlawful discriminatory reason rather than the documented event set forth in the attached exhibits. Plaintiff's assertion that she can only assume that her claims for discrimination are based upon Plaintiff's age, religion, marital status, race, national origin and sex is not sufficient to state a plausible claim for relief. See Plaintiff's response (DE 35) at page 6.

CONCLUSION

The Plaintiff having failed to state facts to show a plausible claim for relief, it is respectfully submitted that the Court should dismiss the action with finality.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of May, 2012, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I further certify that I either mailed the foregoing document and the Notice of Electronic Filing by first class mail to any non CM/ECF participants and/or the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF to any and all active CM/ECF participants.

JOHNSON, ANSELMO, MURDOCH,
BURKE, PIPER & HOCHMAN, P.A.
Attorneys for Defendant
2455 East Sunrise Boulevard, Suite 1000
Fort Lauderdale, FL 33304
954/463-0100 Telephone
954/463-2444 Facsimile
burke@jambg.com

BY: /s/Michael T. Burke
MICHAEL T. BURKE
Florida Bar No. 338771

SERVICE LIST

Pro Se Plaintiff

Nasra M. Arafat

P.O. Box 772177

Coral Springs, FL 33077

MICHAEL T. BURKE, ESQ.

JOHNSON, ANSELMO, MURDOCH,

BURKE, PIPER & HOCHMAN, PA

Attorneys for Defendant

2455 E. Sunrise Blvd., Suite 1000

Fort Lauderdale, FL 33304

burke@jambg.com

(954) 463-0100 (Phone)

(954) 463-2444 (Fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-62525- CIV - DIMITROULEAS / SNOW

Nasra M. Arafat
(pervious married Ibarhim .
Plaintiff,

Vs.

School Board Broward County (Broward.
County Public Schools)
Respondent,

FILED BY
2012 JUN -4 PM 2:29
STEVEN M. LARKIN
CLERK U.S. DIST. CT.
S.D. OF FLA.-FTL

**Plaintiff's Motion For leave To File Further Facts On Defendant's Reply Memorandum
In support Of Motion To Dismiss Plaintiff's Amended Complaint**

Plaintiff, Nasra M. Arafat pro se files this motion according to Local Rule 7.1 (c) titled Memorandum Of Law which prohibited further or additional memoranda of law without prior leave of Court. Therefore plaintiff states the following:

- 1- Plaintiff's Response And Opposing Memorandum Of Law On Defendant's Motion To Dismiss Amended Complaint Or In The Alternative Motion for More Definite Statement was filed and served to all parties on May 21,2012.
- 2- Defendant did reply on plaintiff's opposition by filing defendant's reply by electronic filing generated by CM / ECF as the certificate of service indicated on May 31,2012.
- 3- Defendant's reply has technical legal issue and the reply content on contrary to essential facts which plaintiff believe that it should be presented to this court before the following decision on the case specifically related to defendant's reply memorandum in support of motion to dismiss

plaintiff's amended complaint which defendant filed on May 31,2012.

Therefore plaintiff respectfully submit this motion for consideration in order for plaintiff to present further tangible facts enhanced by legible support.

Certification

Plaintiff, Nasra M. Arafat declare that I obligated to prepare and file my pleadings as a pro-se to the best of my knowledge and better formed after an inquiry reasonable under the circumstances: it is not being presented for any improper purpose nor to increase the cost and the time of litigation .

Respectfully submitted

This 04th day of June, 20 12.

06/04/12
NASRA M. ARAFAT

Plaintiff Pro-Se / Nasra M. Arafat

Certificate of Service

I hereby certify as pro-se that a true and correct copy of the foregoing, **Plaintiff's Motion For leave To File Further Facts On Defendant's Reply Memorandum In support Of Motion To Dismiss Plaintiff's Amended Complaint** was served with the clerk of the court and send by prove of service mail on June 04th ,2012 on all counsel or parties of record on the Service List below.

06/04/12



Signature of plaintiff

SERVICE LIST

Defendant / School Board Broward County

Michael T. Burke and Damiane H. Albert Esq. / Counsel for Defendant
For/ School Board Broward County (public schools)
2455 East Sunrise Blv. Suite # 1000
Fort Lauderdale FL, 33304

And,

Omitting party / EEOC Local Office
2 South Biscayne Blv. Suite # 2700
Miami FL, 33131

Date: June 04th ,2012

06/04/12



Nasra M. Ararat Pro-Se /plaintiff
P.O.BOX 772177
Coral Springs FL, 33077

SERVICE LIST

Defendant / School Board Broward County

Michael T. Burke and Damiane H. Albert Esq. / Counsel for Defendant
For/ School Board Broward County (public schools)
2455 East Sunrise Blv. Suite # 1000
Fort Lauderdale FL, 33304

And,

Omitting party / EEOC Local Office
2 South Biscayne Blv. Suite # 2700
Miami FL, 33131

Submit by plaintiff,
Date: June 04th ,2012

Nasra M. Arafat Pro-Se /plaintiff
P.O.BOX 772177
Coral Springs FL, 33077