

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

**JAWANDA DOVE,**

**Plaintiff,**

**vs.**

**CASE NO.: 3:20-cv-547-MMH-MCR**

**FLAGLER COUNTY SCHOOL  
BOARD,**

**Defendants.**

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**JOINT FINAL PRETRIAL STATEMENT**

COME NOW, the Parties, Plaintiff, JAWANDA DOVE, and Defendant, FLAGLER COUNTY SCHOOL BOARD, by and through their respective undersigned counsel, and pursuant to the Case Management and Scheduling Order and M.D. Local R. 3.06, hereby submit their Joint Pretrial Statement.

**1. Basis of Court's Subject Matter Jurisdiction**

The district court has federal question jurisdiction over Plaintiff's Title VII of the Civil Rights Act of 1964; and the Florida Civil Rights Act of 1992, Fla. Stat §760.01 et al.

**2. Anticipated Length of Trial**

Three (3) days

**3. Concise Statement of the Nature of the Action**

Plaintiff is seeking damages for discrimination based on race and national origin both in terms of employment opportunities and pay disparity at the hands of Defendant.

Defendant asserts no discrimination has taken place, and Plaintiff has been treated fairly by Defendant.

**4. Brief Summary of the Parties' Cases**

*a. Plaintiff's Summary of the Case*

Plaintiff contends she has applied for a number of jobs for which she was not promoted, was qualified for the positions, and should have been promoted.

*b. Defendant's Summary of the Case*

Defendant asserts that Plaintiff was qualified, however, others were better qualified for the positions.

**5. Statement of Damages Sought**

PRE-JUDGEMENT DAMAGES

A. BACK PAY AND BENEFITS

Plaintiff seeks \$100,000.00.

B. NON-ECONOMIC ECONOMIC DAMAGES

None

POST JUDGEMENT COMPENSATORY DAMAGES

A. ECONOMIC

None

B. INTEREST

Statutory

ATTORNEY'S FEES, COSTS and EXPENSES

Statutory

**6. Pending Motions**

Defendant has four (4) Motions in Limine pending with the court, as well as a Motion for Summary Judgment and Supporting Memorandum of Law.

**7. Agreed Facts**

a. Plaintiff is a member of a protected class.

**8. Facts in Dispute**

a. Whether Plaintiff was qualified for the job positions she applied for

b. Whether Plaintiff's race and/or color were motivating factors that prompted Flagler County to not promote her.

c. Whether legitimate, non-discriminatory reasons proffered by Flagler County School Board are pretext for discrimination.

d. Whether Flagler County School Board would have made the same decision to not offer Plaintiff promotions in question.

e. Whether Plaintiff suffered lost wages or benefits as a result of the FCSB's decision to not promote Plaintiff, and if so in what amount.

**9. Agreed Principles of Law**

a. The Court has jurisdiction over the parties and the subject matter of this lawsuit.

b. Venue is proper in the United States District Court, Middle District of Florida, Jacksonville Division.

c. All necessary parties have been joined in this proceeding.

d. The parties have met all jurisdictional prerequisites and precedent to filing a lawsuit in this manner.

**10. Disputed Issues of Law**

None.

**11. Exhibit Lists**

Plaintiff's Exhibit List will be separately filed.

Defendant's Exhibit List will be separately filed.

**12. Witness Lists**

Plaintiff's Witness List will be separately filed.

Defendant's Witness List will be separately filed.

**13. Deposition Designations**

N/A

**14. Jointly-Proposed Jury Instructions and Verdict Form**

The Parties' Joint Proposed Jury Instructions and Verdict Form are attached hereto as Exhibit "A".

**15. Voir Dire**

The Parties' Joint Proposed Voir Dire is attached hereto as Exhibit "B".

DATE: April 6, 2022

*s/ Blair Jackson, Esq.* \_\_\_\_\_

BLAIR JACKSON  
Florida Bar No. 912956  
Law Office of Corey I. Cohen & Associates  
21 Park Lake Street  
(407) 246-0066  
(407) 246-0883 - FAX  
[blair@coreycohen.com](mailto:blair@coreycohen.com)  
Attorneys for Plaintiff

*s/ Richard B. Bush, Esq.* \_\_\_\_\_

RICHARD B. BUSH, ESQ.  
Fla. Bar No.: 294152  
DYLAN J. HALL, ESQ.  
Fla. Bar No.: 112528  
BUSH & AUGSPURGER, P.A.  
411 E. Jackson St.  
Orlando, FL 32801  
(407) 422-5319  
(407) 849-1821 – FAX  
[rbb@bushlawgroup.com](mailto:rbb@bushlawgroup.com)  
[djh@bushlawgroup.com](mailto:djh@bushlawgroup.com)  
[slo@bushlawgroup.com](mailto:slo@bushlawgroup.com)  
Attorneys for Defendant