

EXHIBIT A
FILED UNDER SEAL

EXHIBIT B

EXHIBIT B – DEFICIENT DISCRIMINATION PLAINTIFFS

	Plaintiff's Name	Deficient/Partially Deficient	Failure to Allege Adverse Employment Action	Failure to Allege Facts Sufficient to Support Plausible Inference
1.	Ransford Acquaye	Deficient	¶ 19	¶¶ 19, 21-23
2.	Christopher Adams	Deficient	¶ 26	¶¶ 26, 28-31
3.	Roland Anderson	Deficient	¶ 42	¶¶ 42, 43-45, 47
4.	Lachaun Armstead	Deficient	¶¶ 50-51	¶¶ 50-51; 53-59; 61
5.	Jon A'Lida Aubry	Deficient	¶ 72	¶¶ 72, 74; 77-78
6.	Thomas Ayers	Deficient	¶ 81	¶¶ 81, 83-89
7.	Elonrah Barbour	Deficient	¶ 92	¶¶ 92-95; 97
8.	Elaine Barnett	Partially Deficient	¶ 100	¶¶ 100, 103, 105
9.	Ulysses Barton	Deficient	¶ 111	¶¶ 111-112; 115
10.	Talfourd Berry	Deficient	¶¶ 118, 121	¶¶ 118, 120-121, 123
11.	Greg Bowen	Deficient	¶¶ 136, 138, 142-144	¶¶ 136, 138-144, 146
12.	Phillip Boykin	Partially Deficient	¶¶ 155, 173-175	¶¶ 162-176
13.	Odell Bradley	Deficient	¶¶ 181, 186	¶¶ 181, 185-188; 190
14.	Earl Brown	Deficient	¶ 211	¶¶ 211, 213-221
15.	Roy Brown	Deficient	¶ 193	¶¶ 193-208
16.	Marcus Brunswick	Partially Deficient	¶¶ 234, 245-248; 251-264	¶¶ 227, 234-241; 245-248; 251-264
17.	Michael Caldwell	Deficient	¶ 288	¶¶ 288-299; 301
18.	Curtis Capers	Partially Deficient	¶ 268	¶¶ 273-275
19.	Vernon Carter	Partially Deficient	¶¶ 333, 371-380	¶¶ 333, 371-380
20.	Priscilla Cathey	Partially Deficient	¶ 385	¶¶ 385, 392-402
21.	Hardin Cheatham	Deficient	¶ 410	¶¶ 410, 415-419; 421
22.	Gary Christian	Deficient	¶¶ 424, 427-450; 457	¶¶ 424, 427-450; 457
23.	Edward Clarke	Deficient	¶¶ 460, 461-462; 465-466	¶¶ 460-479; 481
24.	Tamia Coleman	Deficient	¶¶ 518, 520	¶¶ 518, 520-522; 524
25.	Kirk Collins	Deficient	¶¶ 527, 530	¶¶ 527, 530-535; 537
26.	Janice Comeaux	Deficient	¶¶ 540, 542	¶¶ 540, 542-547; 551
27.	Catrina Cooley-Flagg	Deficient	¶ 554	¶¶ 554-555; 561-568
28.	Charlese Cosby	Deficient	¶ 571	¶¶ 571, 573-576; 578
29.	Samuel Cox	Partially Deficient	¶¶ 581-585	¶¶ 581-592
30.	Alvin Cunningham	Deficient	¶¶ 615, 627-630	¶¶ 615, 617-639
31.	Yvette Cunningham	Deficient	¶¶ 642, 644-647; 650	¶¶ 642, 644-647; 650
32.	Davy Dauchan	Partially Deficient	¶¶ 654, 668-669	¶¶ 654-662; 668-669
33.	Thomas Dawkins	Deficient	¶¶ 676-679; 682; 683-686	¶¶ 676-687; 689
34.	Yvonne Dixon	Partially Deficient	¶¶ 705, 710-711	¶¶ 705, 710-715
35.	Everett Dubois	Deficient	¶ 768	¶¶ 768-772; 774
36.	Cynthia Edwards	Deficient	¶ 719	¶¶ 719, 722-730
37.	Gertrude Ellison	Deficient	¶¶ 734, 736	¶¶ 734-736; 738

	Plaintiff's Name	Deficient/Partially Deficient	Failure to Allege Adverse Employment Action	Failure to Allege Facts Sufficient to Support Plausible Inference
38.	Connie Everett	Deficient	¶ 761	¶¶ 761, 763-764
39.	George Everett	Deficient	¶¶ 777, 779	¶¶ 777, 779, 781
40.	Devern Fleming, Jr.	Deficient	¶¶ 785, 787, 797, 801-816	¶¶ 785-787; 791-793; 797, 799-831; 834
41.	Brandi Ford	Deficient	¶ 838	¶¶ 838-843; 846
42.	Riley Freeman	Deficient	¶¶ 850-854; 859-860	¶¶ 850-861; 863
43.	Owen Funderburke, III	Deficient	¶ 867	¶¶ 872-901; 903
44.	Lynn Garland-Solomon	Deficient	¶¶ 907-908; 910	¶¶ 907-908; 910
45.	Gail George	Deficient	¶ 914	¶¶ 914-919; 921
46.	Kenneth Gillis	Deficient	¶ 925	¶¶ 925-948; 950
47.	Michael Green	Deficient	¶¶ 954, 961	¶¶ 954-961; 963
48.	Reginald Grigsby	Deficient	¶ 967	¶¶ 967-969; 971
49.	Beverly Hall	Deficient	¶¶ 975, 990, 992	¶¶ 975-993
50.	Lauren Ashley Hall	Deficient	¶¶ 997, 1000, 1002, 1004, 1007, 1008	¶¶ 997-998; 1000-1011
51.	Carolyn Hamilton	Partially Deficient	¶ 1016	¶¶ 1016, 1029-1038
52.	Steven Harris	Deficient	¶ 1044	¶¶ 1044-1045; 1047
53.	Betty Haymer	Partially Deficient	¶¶ 1051, 1054-1056; 1058-1064; 1066	¶¶ 1051-1056; 1058-1066
54.	Billy Hollis	Deficient	¶¶ 1075, 1077, 1079-1082	¶¶ 1075-1082; 1084
55.	Shawn Horton	Deficient	¶¶ 1090, 1096	¶¶ 1090-1096; 1098
56.	Betty Howard	Deficient	¶ 1113	¶¶ 1113-1120
57.	Lawrence Howard, Jr.	Deficient	¶¶ 1102, 1106-1107	¶¶ 1102-1109; 1111
58.	Lewis Howard	Deficient	¶ 1124	¶¶ 1124, 1126-1131
59.	Akanke Isoke	Deficient	¶¶ 1135-1137, 1140-1141	¶¶ 1135-1143; 1145
60.	James Ivey	Deficient	¶¶ 1149-1151	¶¶ 1149-1161; 1165
61.	Leroy Jackson	Deficient	¶ 1169	¶¶ 1169-1172; 1174
62.	Wendy Rowlett Jennings	Deficient	¶ 1178	¶¶ 1178-1180; 1182
63.	Lena Faye Johnson	Deficient	¶ 1186	¶¶ 1186-1187; 1189
64.	Bobby Johnson	Deficient	¶ 1192	¶¶ 1192-1202
65.	Helen Johnson-Gardiner	Deficient	¶ 1207	¶¶ 1207-1221
66.	Diane Jones	Deficient	¶¶ 1224, 1229, 1231-1236	¶¶ 1224-1239; 1241
67.	Douglas Jones	Deficient	¶ 1246	¶¶ 1246, 1248-1250
68.	Henry Jones	Deficient	¶¶ 1254, 1261-1262	¶¶ 1254-1263; 1265

	Plaintiff's Name	Deficient/Partially Deficient	Failure to Allege Adverse Employment Action	Failure to Allege Facts Sufficient to Support Plausible Inference
69.	Joseph Jones	Deficient	¶¶ 1268-1270; 1272	¶¶ 1268-1276; 1278
70.	Lillie King-Shepard	Deficient	¶¶ 1879, 1881	¶¶ 1879-1882; 1884
71.	Cheryl Kyler	Deficient	¶¶ 1281, 1283	¶¶ 1281, 1284-1286; 1288
72.	John Laners	Deficient	¶ 1323	¶¶ 1323-1333; 1336-1337
73.	Christopher Larkett	Partially Deficient	¶¶ 1340, 1350, 1352	¶¶ 1340, 1342-1346; 1350-1356
74.	Juanita Macomson	Deficient	¶ 1376	¶¶ 1376-1385; 1387
75.	Jacqueline Renee Martin	Deficient	¶ 1391	¶¶ 1391-1400; 1402
76.	Brenda Matthews	Deficient	¶¶ 1405, 1411	¶¶ 1405, 1408-1412; 1414
77.	Sabrina McCrae	Deficient	¶¶ 1425-1428	¶¶ 1425-1430; 1432
78.	Hilry McNealey	Deficient	¶¶ 1419, 1421	¶¶ 1491, 1421
79.	Anthony Mellerson	Deficient	¶ 1435	¶¶ 1435-1437; 1439
80.	Pamela Michaux	Deficient	¶¶ 1443-1447	¶¶ 1443-1447, 1449
81.	Timothy Murphy	Partially Deficient	¶ 1452, 1457-1463	¶¶ 1452, 1457-1464
82.	Donald Murray	Deficient	¶¶ 1469, 1471	¶¶ 1469-1471; 1473
83.	Michael Neal	Deficient	¶¶ 1477, 1479	¶¶ 1477-1480; 1482
84.	James Overton	Deficient	¶ 1486	¶¶ 1486-1487, 1489
85.	Joseph Peden	Deficient	¶¶ 1499, 1501-1502; 1505	¶¶ 1499, 1501-1502; 1505
86.	James Peoples	Deficient	¶ 1509	¶¶ 1509, 1511-1517
87.	Gilbert Pete	Deficient	¶¶ 1521-1523	¶¶ 1521-1524; 1526
88.	Gloria Plummer	Deficient	¶¶ 1565-1568; 1570	¶¶ 1565-1568; 1570
89.	Joseph Presha	Deficient	¶¶ 1573, 1576	¶¶ 1573-1577; 1583
90.	Robert Redd	Deficient	¶ 1627	¶¶ 1627-1629
91.	Faye Reed	Deficient	¶¶ 1617-1620	¶¶ 1617-1621, 1623
92.	Derek Reuben	Deficient	¶ 1647	¶¶ 1647-1649; 1652
93.	Brian Richards	Partially Deficient	¶ 1655	¶¶ 1655, 1660-1663; 1669-1680
94.	Tim Richardson	Deficient	¶ 1685	¶¶ 1685-1688; 1690
95.	Louis Ricks, III	Deficient	¶ 1694	¶¶ 1694-1698; 1700
96.	LaSonya Rivers	Partially Deficient	¶¶ 1704, 1715-1721	¶¶ 1704-1707; 1715-1721
97.	Frederic Roane	Deficient	¶¶ 1734-1737	¶¶ 1734-1738; 1740
98.	Ramona Ross	Partially Deficient	¶¶ 1757, 1784	¶¶ 1757-1766; 1784-1785
99.	Moses Rothchild	Partially Deficient	¶¶ 1791-1794	¶¶ 1791-1794
100.	Sharon Montgomery Robinson	Deficient	¶¶ 1743-1751; 1753	¶¶ 1743-1751; 1753

	Plaintiff's Name	Deficient/Partially Deficient	Failure to Allege Adverse Employment Action	Failure to Allege Facts Sufficient to Support Plausible Inference
101.	Cynthia Sargent	Partially Deficient	¶ 1804, 1815-1822; 1828-1829	¶¶ 1804-1811; 1815-1829
102.	John Scott	Deficient	¶¶ 1836, 1838	¶¶ 1836-1838; 1840
103.	Shanetta Scott	Deficient	¶ 1844	¶¶ 1844-1852
104.	Tavio Scott	Partially Deficient	¶¶ 1856, 1865-1869	¶¶ 1856, 1858-1859; 1865-1869
105.	Leonard Seamon	Deficient	¶ 1873	¶¶ 1873-1876
106.	Rudy Singletary	Deficient	¶ 1887	¶¶ 1887-1900
107.	Linda Stafford	Deficient	¶¶ 1919, 1921-1933	¶¶ 1919-1933; 1938
108.	Shirley Taliaferro	Deficient	¶ 1942	¶¶ 1942-1943; 1945
109.	Bryant Thelwel	Deficient	¶ 1948	¶¶ 1948-1958
110.	Leo Thomas	Deficient	¶¶ 1961, 1964-1965	¶¶ 1961, 1967-1983; 1985
111.	William Thomas	Deficient	¶ 1989	¶¶ 1989-1990; 1992
112.	Jewell Tilghman	Partially Deficient	¶¶ 1997-1998	¶¶ 1997-1998
113.	Eileen Vyhuis	Deficient	¶ 2005	¶¶ 2005, 2007, 2009
114.	Everett Wair, Sr.	Deficient	¶¶ 2012, 2018-2022	¶¶ 2012-2022; 2024
115.	Frederick Wall	Deficient	¶¶ 2027, 2028, 2033	¶¶ 2027-2033; 2035
116.	Lee Flora Wayne	Deficient	¶¶ 2038-2039	¶¶ 2038-2054
117.	William Waytes	Deficient	¶¶ 2058, 2063, 2065	¶¶ 2058-2066; 2069
118.	Angela Weaver	Deficient	¶¶ 2073, 2075	¶¶ 2073-2075; 2077
119.	Patricia Wellington	Deficient	¶¶ 2081-2084	¶¶ 2081-2086; 2088
120.	Ronald Wells	Deficient	¶ 2120	¶¶ 2120, 2123-2134; 2136
121.	Jimmy Lee Whitley	Deficient	¶ 2140	¶¶ 2140-2144; 2146
122.	Evelyn Whitlow	Deficient	¶¶ 2150-2153; 2155	¶¶ 2150, 2152-2153; 2155
123.	Frank Williams	Deficient	¶¶ 2173, 2175-2176	¶¶ 2173, 2175-2176; 2178
124.	Gary Williams	Deficient	¶ 2180	¶¶ 2180-2192
125.	Theresa Williams	Deficient	¶¶ 2237, 2239	¶¶ 2237, 2239
126.	Robert Williams, III	Partially Deficient	¶¶ 2196, 2214-2225	¶¶ 2196-2198; 2214
127.	Ronnie Williams, Sr.	Deficient	¶ 10	¶¶ 10, 12-16
128.	Garner Willis, Jr.	Deficient	¶¶ 2242, 2258	¶¶ 2242, 2248-2259; 2261
129.	Eric Woodruff	Deficient	¶ 2265	¶¶ 2265-2269; 2271
130.	Curtis Yates	Deficient	¶¶ 2275-2278; 2280	¶¶ 2275-2278; 2280

EXHIBIT C

EXHIBIT C – DEFICIENT HARASSMENT PLAINTIFFS

	Plaintiff's Name	Insufficient "Work-Related" Actions	Conclusory Allegations, Fails to Sufficiently Satisfy <i>Prima Facie</i> Case
1	Ransford Acquaye	¶¶ 20-23	
2	Christopher Adams	¶¶ 27-31	
3	Roland Anderson	¶¶ 43-47	
4	Lachau Armstead	¶¶ 51, 53-59	¶¶ 51-52
5	Jon A'Lida Aubry	¶¶ 73-75, 77	¶¶ 75-76
6	Sherryl Aubry	¶¶ 65-68	
7	Elnorah Barbour	¶¶ 92-97	
8	Elaine Barnett	¶¶ 100-106	¶¶ 107
9	Ulysses Barton	¶¶ 111-112	
10	Talfourd Berry	¶¶ 119-122	
11	Roger Boston	¶¶ 126-131	¶¶ 132
12	Greg Bowen	¶¶ 136-144	¶¶ 145
13	Phillip Boykin	¶¶ 155-177	
14	Odell Bradley	¶¶ 181-189	
15	Marcus Brunswick	¶¶ 234-260, 262-265	¶¶ 261
16	Michael Caldwell	¶¶ 288-300	
17	Vernon Carter	¶¶ 351-368, 371-381	¶¶ 347-350
18	Hardin Cheatham	¶¶ 411-419	¶¶ 420
19	Gary Christian	¶¶ 424-451	
20	Edward Clarke	¶¶ 460-480	
21	Tamia Coleman	¶¶ 518-522	¶¶ 523
22	Kirk Collins	¶¶ 527-536	
23	Janice Comeaux	¶¶ 540-547	¶¶ 549-550
24	Catrina Cooley-Flagg	¶¶ 554-556, 561-567	¶¶ 557-560
25	Charlese Cosby	¶¶ 571-577	
26	Samuel Cox	¶¶ 581-611	
27	Alvin Cunningham	¶¶ 615-637	
28	Yvette Cunningham	¶¶ 642-647	¶¶ 648-649
29	Davy Dauchan	¶¶ 654-670	
30	Thomas Dawkins	¶¶ 681-688	
31	Anna Desper	¶¶ 693-698	
32	Yvonne Dixon	¶¶ 705-716	
33	Everett Dubois	¶¶ 768-773	
34	Gertrude Ellison	¶¶ 734-737	
35	William Ellison	¶¶ 742-756	
36	Connie Everett	¶¶ 761	¶¶ 762-763
37	George Everett	¶¶ 777-780	
38	Devern Fleming, Jr.	¶¶ 785-831	¶¶ 832-833
39	Brandi Ford	¶¶ 838-843	¶¶ 844-845

	Plaintiff's Name	Insufficient "Work-Related" Actions	Conclusory Allegations, Fails to Sufficiently Satisfy <i>Prima Facie</i> Case
40	Riley Freeman	¶¶ 850-862	
41	Owen Funderburke, III	¶¶ 867-902	
42	Lynn Garland-Solomon	¶¶ 907-909	
43	Gail George	¶¶ 914-915, 917-919	¶¶ 916, 920
44	Kenneth Gillis	¶¶ 925-949	
45	Michael Green	¶¶ 954-962	
46	Reginald Grigsby	¶¶ 967-970	
47	Beverly Hall	¶¶ 975-989	¶¶ 990-991, 993
48	Lauren Ashley Hall	¶¶ 997-998, 1003-1006	¶¶ 999-1002, 1007
49	Carolyn Hamilton	¶¶ 1016-1039	
50	Steven Harris	¶¶ 1044-1046	
51	Billy Hollis	¶¶ 1075-1082	¶¶ 1083
52	Shawn Horton	¶¶ 1090-1097	
53	Lawrence Howard, Jr.	¶¶ 1102-1107, 1109	¶¶ 1108, 1110
54	Lewis Howard	¶¶ 1124-1130	
55	Akanke Isoke	¶¶ 1135-1144	
56	Leroy Jackson	¶¶ 1169-1173	
57	Wendy Rowlett Jennings	¶¶ 1178-1181	
58	Lena Faye Johnson	¶¶ 1186-1188	
59	Diane Jones	¶¶ 1224-1228, 1232-1234, 1237-1239	¶¶ 1229-1231, 1236
60	Douglas Jones	¶¶ 1246-1250	
61	Henry Jones	¶¶ 1254-1264	
62	Joseph Jones	¶¶ 1268-1271, 1273-1277	¶¶ 1272
63	Lillie King-Shepard	¶¶ 1879-1883	
64	Cheryl Kyler	¶¶ 1281-1287	
65	Gilbert Landry	¶¶ 1290-1299, 1301-1306, 1310-1314, 1317-1318	¶¶ 1300, 1307-1309, 1315-1316
66	Christopher Larkett	¶¶ 1340-1356	
67	Arthur Logan	¶¶ 1361-1372	
68	Juanita Macomson	¶¶ 1376-1386	
69	Jacqueline Renee Martin	¶¶ 1391-1401	
70	Brenda Matthews	¶¶ 1405-1413	
71	Sabrina McCrae	¶¶ 1425, 1427, 1429-1430	¶¶ 1426, 1428, 1431
72	Hilry McNealey		¶¶ 1418-1419
73	Anthony Mellerson	¶¶ 1435-1438	
74	Pamela Michaux	¶¶ 1443	¶¶ 1444-1448
75	Timothy Murphy	¶¶ 1452-1465	
76	Donald Murray	¶¶ 1469-1472	
77	Michael Neal	¶¶ 1477-1481	
78	James Overton	¶¶ 1486-1488	
79	Joseph Peden	¶¶ 1499-1502	¶¶ 1503-1504

	Plaintiff's Name	Insufficient "Work-Related" Actions	Conclusory Allegations, Fails to Sufficiently Satisfy <i>Prima Facie</i> Case
80	James Peoples	¶¶ 1509-1516	
81	Gilbert Pete	¶¶ 1521, 1523-1524	¶¶ 1522, 1525
82	Gloria Plummer	¶¶ 1565-1569	
83	Faye Reed	¶¶ 1617-1622	
84	Kurt Rent	¶¶ 1633-1643	
85	Derek Reuben	¶¶ 1647-1649	¶¶ 1650-1651
86	Tim Richardson	¶¶ 1685-1689	
87	Louis Ricks, III	¶¶ 1694-1699	
88	LaSonya Rivers	¶¶ 1704-1729	
89	Frederic Roane	¶¶ 1734-1739	
90	Sharon Montgomery Robinson	¶¶ 1743-1745, 1748-1751	¶¶ 1746-1747, 1752
91	Moses Rothchild	¶¶ 1791-1796	¶¶ 1797-1798
92	Cynthia Sargent	¶¶ 1804-1830	
93	John Scott	¶¶ 1836-1839	
94	Janet Smith-Cook	¶¶ 1906-1915	
95	Linda Stafford	¶¶ 1919-1933	¶¶ 1934-1937
96	Shirley Taliaferro	¶¶ 1942-1944	
97	Leo Thomas	¶¶ 1961-1969, 1973-1984	¶¶ 1970-1972
98	William Thomas	¶¶ 1989-1991	
99	Jewell Tilghman	¶¶ 1997-2000	
100	Eileen Vyhuis	¶¶ 2005-2008	
101	Everett Wair, Sr.	¶¶ 2012-2019, 2022	¶¶ 2020-2021, 2023
102	Frederick Wall	¶¶ 2027-2034	
103	William Waytes	¶¶ 2058-2066	¶¶ 2067-2068
104	Angela Weaver	¶¶ 2073-2074	¶¶ 2075-2076
105	Patricia Wellington	¶¶ 2081, 2084-2086	¶¶ 2082-2083, 2087
106	Ronald Wells	¶¶ 2120-2133, 2135	
107	Jimmy Lee Whitley	¶¶ 2140-2143	¶¶ 2144-2145
108	Evelyn Whitlow	¶¶ 2150, 2152-2153	¶¶ 2151, 2154
109	Carolyn Williams	¶¶ 2159-2169	
110	Robert Williams, III	¶¶ 2196-2227	¶¶ 2228-2232
111	Theresa Williams	¶¶ 2237-2238	
112	Ronnie Williams, Sr.	¶¶ 9-16	
113	Garner Willis, Jr.	¶¶ 2242, 2249-2259	¶¶ 2243-2245, 2247, 2260
114	Eric Woodruff	¶¶ 2265-2270	
115	Curtis Yates	¶¶ 2275-2279	

EXHIBIT D

EXHIBIT D – PARTIALLY TIME-BARRED PLAINTIFFS

	Plaintiff's Name	Time-Barred Paragraphs	Paragraphs Not Time-Barred¹
1	Lachaun Armstead	¶¶ 51-52, 59-60	¶¶ 53-59
2	Jon A'Lida Aubry	¶¶ 72, 75	¶¶ 73-74
3	Sherryl Aubry	¶¶ 64, 68	¶¶ 65-66
4	Marcus Brunswick	¶¶ 227-231, 234, 235-241, 245-248, 251-262, 265	¶¶ 242-244, 249-250, 263-264
5	Curtis Capers	¶¶ 268-269, 272-275	¶¶ 276-284
6	Vernon Carter	¶¶ 333-338, 341-344, 381	¶¶ 340, 345-380
7	Samuel Cox	¶¶ 581-584, 596-598, 604, 611	¶¶ 585-595, 599-603, 605-610
8	Alvin Cunningham	¶¶ 615-616, 621-624, 626-630	¶¶ 617-620, 625, 631-638
9	Davy Dauchan	¶¶ 652, 654-662, 667-668, 670	¶¶ 663-666, 669
10	Thomas Dawkins	¶¶ 675-679, 681-682, 688	¶¶ 683-687
11	Gertrude Ellison	¶¶ 734-735, 737	¶¶ 736
12	Devern Fleming, Jr.	¶¶ 783-785, 791-822, 824-833	¶¶ 786-790, 823
13	Riley Freeman	¶¶ 848, 850-852, 854-862	¶¶ 853
14	Betty Haymer	¶¶ 1048, 1051-1052, 1057-1062, 1066, 1070	¶¶ 1054-1055, 1063-1065, 1067-1069
15	Billy Hollis	¶¶ 1073, 1078-1081, 1083	¶¶ 1076-1077, 1082
16	Akanke Isoke	¶¶ 1133, 1135-1137, 1144	¶¶ 1138-1143
17	James Ivey	¶¶ 1149, 1163-1164	¶¶ 1150-1162
18	Helen Johnson-Gardiner	¶¶ 1205, 1207-1214	¶¶ 1215-1220
19	Diane Jones	¶¶ 1224-1228, 1240	¶¶ 1229-1239
20	Cheryl Kyler	¶¶ 1281-1286, 1287	¶¶ 1284-1286
21	Timothy Murphy	¶¶ 1452-1457, 1465	¶¶ 1453, 1458-1464
22	Joseph Peden	¶¶ 1497, 1499, 1502-1503	¶¶ 1501
23	Joseph Presha	¶¶ 1571, 1574-1578	¶¶ 1574
24	LaSonya Rivers	¶¶ 1702, 1704-1707, 1718-1721, 1729	¶¶ 1708-1717, 1722-1728
25	Moses Rothchild	¶¶ 1789, 1791-1793, 1797-1798	¶¶ 1794-1796
26	Tavio Scott	¶¶ 1854, 1856-1860, 1870	¶¶ 1858, 1860-1869
27	Bryant Thelwel	¶¶ 1948-1953	¶¶ 1950-1957
28	Jewell Tilghman	¶¶ 1995, 1997-2000	¶¶ 1997-1999
29	Patricia Wellington	¶¶ 2081, 2087	¶¶ 2082-2086

¹ Amtrak does not concede that the paragraphs in this column are otherwise sufficiently stated to establish a plausible claim. The exhibit is provided for the Court's convenience and to understand Amtrak's specific argument on this issue.

	Plaintiff's Name	Time-Barred Paragraphs	Paragraphs Not Time-Barred¹
30	Robert Williams, III	¶¶ 2194, 2196-2198, 2206, 2217-2232	¶¶ 2197-2205, 2206-2216, 2229
31	Garner Willis, Jr.	¶¶ 2242-2248	¶¶ 2250-2257

EXHIBIT E

**EXHIBIT E – REMAINING PLAINTIFFS WHOSE CLAIMS ARE ARGUABLY
SUFFICIENT TO SURVIVE DISMISSAL**

	Plaintiff's Name	Discrimination Claims (paragraphs arguably sufficient)	Harassment Claims (paragraphs arguably sufficient)	Retaliation Claims (paragraphs arguably sufficient)
1	Harold Adams	All	N/A ¹	N/A
2	Sherryl Aubry	All	N/A	N/A
3	Elaine Barnett	¶ 106	N/A	N/A
4	Phillip Boykin	¶¶ 156-168	N/A	N/A
5	Marcus Brunswick	¶¶ 242-244, 249-250	N/A	N/A
6	Curtis Capers	¶¶ 276-284	N/A	N/A
7	Thomas Carter	All	All	N/A
8	Vernon Carter	¶¶ 345-367	N/A	N/A
9	Priscilla Cathey	¶¶ 388-390	All	N/A
10	Raymond Lee Coleman	All	All	N/A
11	Samuel Cox	¶¶ 593-610	N/A	N/A
12	Anna Desper	All	N/A	N/A
13	Davy Dauchan	¶¶ 663-667	N/A	N/A
14	Yvonne Dixon	¶¶ 706-709	N/A	N/A
15	William Ellison	All	N/A	N/A
16	Carolyn Hamilton	¶¶ 1017-1026	N/A	N/A
17	James Ivey	N/A	All	N/A
18	Gilbert Landry	All	N/A	N/A
19	John Laners	N/A	All	N/A
20	Christopher Larkett	¶¶ 1347-1349	N/A	N/A
21	Arthur Logan	All	N/A	N/A
22	Timothy Murphy	¶¶ 1453-1456	N/A	N/A
23	Robert Parris	All	N/A	N/A
24	Daphne Pinkey-Clarke	All	All	N/A
25	Joseph Presha	N/A	All	N/A
26	Larry Prince	All	All	N/A
27	Kurt Rent	All	N/A	N/A
28	Brian Richards	¶¶ 1656-1659	All	N/A
29	LaSonya Rivers	¶¶ 1708-1714, 1722-1728	N/A	N/A

¹ The designation “N/A” means only that the Plaintiff has either not asserted this claim or the claim should be dismissed in its entirety as explained in Amtrak’s Memorandum.

	Plaintiff's Name	Discrimination Claims (paragraphs arguably sufficient)	Harassment Claims (paragraphs arguably sufficient)	Retaliation Claims (paragraphs arguably sufficient)
30	Ramona Ross	¶¶ 1767-1783	All	N/A
31	Moses Rothchild	¶¶ 1795-1796	N/A	All
32	Cynthia Sargent	¶¶ 1812-1814	N/A	N/A
33	Tavio Scott	¶¶ 1862-1864	All	N/A
34	Janet Smith-Cook	All	N/A	N/A
35	Jewell Tilghman	¶ 1999	N/A	N/A
36	Garolyn Wells	All	All	All
37	Ronald Wells	N/A	N/A	All
38	Carolyn Williams	All	N/A	N/A
39	Frank Williams	N/A	All	N/A
40	Robert Williams, III	¶¶ 2199-2213, 2226-2227	N/A	N/A