

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

KURT GLICK,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:22-CV-00015-TAV-CHS
)	
CITY OF TULLAHOMA, TENNESSEE,)	Judge Thomas A. Varlan
)	Magistrate Judge Christopher H. Steger
Defendant.)	

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S FIRST SET OF INTERROGATORIES**

Comes Plaintiff Kurt Glick in response to City of Tullahoma's First Set of Interrogatories and submits the following:

INTERROGATORIES

1. Before or since the filing of this lawsuit, have you ever been involved as a plaintiff, defendant, witness, or otherwise in any legal action of any kind, including civil or criminal, or any bankruptcy proceeding whether individual or business? If so, state for each such action:
 - (a) the date, place, and court in which each such action was filed;
 - (b) the name of the other party or parties involved;
 - (c) the court number of such action;
 - (d) the name of the attorney who represented the plaintiff in each such action or the name of the attorney who represented you; and
 - (e) a description of the nature and outcome of each such action.

businesses and grossed \$24,000 in 2021.

Red Star, Vendor, Ronnie Dodd Owner, 2008-2012 – part-time selling t-shirts at concerts, races, and other sporting events. I worked on a part-time basis.

Taco Bell, Murfreesboro, TN – Assistant Manager, September 1984 – April, 1985

4. Provide the name, address, and telephone number of any employer, entity, organization, or individual with whom you have spoken with or otherwise communicated about employment opportunities since November 2020. For each, specify the date of the communication, the form of the communication, and whether you submitted an employment application.

ANSWER:

I have inquired into job opportunities online at Indeed.com.

5. State the name, address, and telephone number of each and every person known to you or by your attorneys who:

- (a) witnessed any of the events set out in the Complaint, including each and every person from who you allegedly heard “comments” about the investigation from or through, including, for example, members of the “family with whom” you are “close friends,” as alleged in paragraph nineteen (19) of the Complaint;
- (b) claims to have any knowledge regarding the events set out in the Complaint;
- (c) claims to have any knowledge of facts relevant to any other issue in the case, including proving damages or impeachment witnesses; and
- (d) give a brief summary of the facts about which that person claims to have

knowledge.

ANSWER:

Kurt Glick, c/o Burnette, Dobson & Pinchak, 711 Cherry St., Chattanooga, TN – I have knowledge of the discrimination practiced against me by Defendant, Casta Brice, and Jennifer Moody; Defendant's intent to terminate my employment; the investigation by Wimberly Lawson; the meeting with the employees of the Parks and Recreation Department and me upon my return to work; being put on a Performance Improvement Plan; the suspension of me for one week following my return to work; the treatment of me in performing my job duties; discrimination against other male individuals; discussions about me with other employees and citizens of Tullahoma, and my forced retirement. I also have knowledge of the damages I have suffered as a result of Defendant's discriminatory actions.

Carla Glick, 118 Bradbury Court, Tullahoma, TN 37388 – Mrs. Glick is my wife and has knowledge of the humiliation and embarrassment I have suffered as a result of Defendant's actions.

Erica Hill, Tullahoma, TN – Alderman Daniel Berry came to Ms. Hill's home and told her and her family that I was being investigated by the City. He further told her that that I was stealing from the City and that I was against the diversity council.

Richard Shasteen, Tullahoma, TN – Mr. Shasteen is the former fire chief with Tullahoma, Tennessee. Mr. Shasteen has knowledge of the discrimination against me, and other older male employees employed by the City of Tullahoma.

J. P. Kraft, former employee of City of Tullahoma – Mr. Kraft worked for the

Parks and Recreation Department. He was interviewed by WimberlyLawson, heard remarks from Jennifer Moody such as "the investigation didn't go the way we expected and Kurt will be coming back to work tomorrow," was present when Ms. Moody read the charges against me and gave her speech before I could return to work, and knows the treatment I received from Ms. Moody and Ms. Brice as they were trying to terminate my employment or force me out of the City employment.

Lyle Russell, City of Tullahoma – Mr. Russell worked for the City of Tullahoma. He was interviewed by WimberlyLawson and has knowledge of Ms. Moody trying to terminate my employment or force me to resign.

Rosemary Golden, City of Tullahoma – Ms. Golden is employed by the City of Tullahoma. She has knowledge of the events from November 2020 – May 2021 when Defendant tried to terminate my employment or force me to resign. Ms. Golden has knowledge of Ms. Brice stating that "the investigation didn't go the way they wanted."

Jennifer Moody, c/o City of Tullahoma – Ms. Moody is the City Administrator for the City of Tullahoma. Ms. Moody became angry with me when opposed discrimination based on age, race, and sex and refused to participate in such discrimination. Thereafter, Ms. Moody set out to terminate my employment because I am male, over the age of 40, white, and because I opposed and refused to participate in discrimination. She made comments such as "we are not going to hire another over 40 white male." Ms. Moody set up an investigation of me and my work performance by having WimberlyLawson interview my co-workers, placing me on a performance improvement plan, making comments that the "investigation did not go the way we wanted," reading the charges against me to the employees of the Parks and Recreation Department and further embarrassing me, telling

me that she would fire me if I did anything wrong (or that she did not like), and forcing my resignation. After she forced me to resign, Ms. Moody caused her friend at the Tullahoma newspaper to write a detailed series of articles making it impossible for me to find another job.

Casta Brice, c/o City of Tullahoma – Ms. Brice is the Human Resources Director with the City of Tullahoma. Ms. Brice and Ms. Moody are good friends and wanted younger, female employees at the City of Tullahoma. Ms. Brice joined Ms. Moody in setting out to terminate my employment because I am white, a male and because I am over 40 years old. In addition, Ms. Brice conspired to retaliate against me when I refused to discriminate against others. Ms. Brice joined Ms. Moody in setting up an investigation of me and my work performance, having WimberlyLawson interview my co-workers, placing me on a performance improvement plan, and forcing my resignation. Ms. Brice also groomed a female employee, Sheila Rico, for a management job with the City of Tullahoma.

The following are employees interviewed by WimberlyLawson and have knowledge of the types of questions asked regarding me and my work performance – Stacy Scott, Margie Hankins, Charles Wilkerson, Brooke Thomas, Sheila Rico, Tom Foster, Ian Anderson, Marcus Blackburn, Dustin Prince, Ted Johnson, J. P. Kraft, Lyle Russell, and myself.

Fredrick Baker, Esq. and Mary Dee Allen, Esq, WimberlyLawson, P.O. Box 655, Cookeville, TN 38503 – Mr. Baker and Ms. Allen have knowledge of the information that they were asked to inquire into by Ms. Brice and Ms. Moody and the names of the individuals they interviewed.

Ms. Jenna Amacher, 206 Amhurst, Tullahoma, TN – Ms. Amacher is an Alderman in the City of Tullahoma and has knowledge of the comments made by Jennifer Moody and Casta Brice regarding Plaintiff.

6. State the name, address, and telephone number of each and every person allegedly having any knowledge of any admission which you contend tends to prove liability on the part of the Defendant, including person(s) that you allude to in paragraph twenty-two (22) of the Complaint regarding statements allegedly made by Jennifer Moody and Casta Brice. For each such person identified, state the substance of the admission, where the admission was allegedly made, when the admission was allegedly made, and identify by name, telephone number, and address those persons present at the time the alleged admission was made.

ANSWER:

Objection. Defendant is requesting attorney work product. Plaintiff does not have knowledge what type of comment is an admission by Defendant in the legal sense. Without waiving such objection, see response to Interrogatory 5.

7. State each and every contention or fact that supports your allegation in paragraph twenty-four (24) of the Complaint that “the City Administrator was determined to terminate [you] and replace [you] with a female and/or someone younger.”

ANSWER:

See responses to Interrogatory 5. In October or November 2020, the position of Athletic Director came open. Lyle Russell, who was the program director, chose three candidates to interview – a white, male over 40 years of age, a female, and an African

Kurt Glick

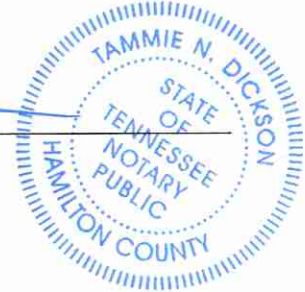
Kurt Glick

STATE OF TENNESSEE
COUNTY OF HAMILTON

Sworn to me this 6 day of June, 2022.

Tammie N. Dickson

Notary Public



My Commission Expires: 9/21/24

Harry F. Burnette

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