

4. At all times, Plaintiff met or exceeded Defendant's reasonable employment expectations.

5. On November 1, 2018 Plaintiff suffered a workplace injury while working within the course and scope of his employment with Defendant, and then became eligible for Workers Compensation benefits.

6. Plaintiff promptly sought and received medical treatment for his workplace injury on November 1, 2018.

7. On April 1, 2019 Defendant terminated Plaintiff's employment.

8. Plaintiff's employment was terminated for exercising his rights under the Illinois Workers' Compensation Act, in violation of 820 ILCS 305 (4)(h).

9. There is a causal connection between Plaintiff's exercise of his rights under the Workers' Compensation Act and Defendants termination.

10. As a direct and proximate result of Defendant's termination of Plaintiff's employment in violation of the 820 ILCS 305 (4)(h), Plaintiff has suffered and will continue and incur loss of income, loss of benefits, emotional distress, embarrassment and humiliation.

WHEREFORE, Plaintiff moves this Honorable Court to find in his favor and against Defendant, and award Plaintiff damages in excess of FIFTY-THOUSAND DOLLARS (\$50,000.00); all further and different relief as the Court finds necessary to fully compensate Plaintiff for the damages by Defendant, including but not limited to:

- A. All back wages and benefits; and
- B. All appropriate front pay and benefits; and
- C. Pre-judgment interest and post-judgment interest; and
- D. Emotional distress and compensatory damages; and
- E. Such Further and additional relief as the Court in its discretion deems appropriate and just.

**COUNT II
(RETALIATORY DISCHARGE-PUNITIVE DAMAGES)**

COMES NOW Plaintiff, RODERICK JONES, by his undersigned attorneys, and for count II of his complaint against Defendant, ZADE TRUCKING, LLC, states:

1. At all times relevant Plaintiff is an individual who lives in the City of East St. Louis, County of St. Clair and State of Illinois.
2. Defendant, ZADE TRUCKING, LLC, (hereafter "Zade Trucking") is a corporation doing business in the City of East St. Louis, County of St. Clair, State of Illinois.
2. Prior to April 1, 2019, Plaintiff was an employee of ZADE TRUCKING, LLC, working in East St. Louis, Illinois.
4. At all times, Plaintiff met or exceeded Defendant's reasonable employment expectations.
5. On November 1, 2018 Plaintiff suffered a workplace injury while working within the course and scope of his employment with Defendant, and then became eligible for Workers Compensation benefits.

6. Plaintiff promptly sought and received medical treatment for his workplace injury on November 1, 2018.
7. On April 1, 2019 Defendant terminated Plaintiff's employment.
8. Plaintiff's employment was terminated for exercising his rights under the Illinois Workers' Compensation Act, in violation of 820 ILCS 305 (4)(h).
9. There is a causal connection between Plaintiff's exercise of his rights under the Workers' Compensation Act and Defendants termination.
10. As a direct and proximate result of Defendant's termination of Plaintiff's employment in violation of the 820 ILCS 305 (4)(h), Plaintiff has suffered and will continue and incur loss of income, loss of benefits, emotional distress, embarrassment and humiliation.
11. Punitive damages are necessary to punish this Defendant and other entities who are similarly disposed to violate the strong public policy of the State of Illinois found in the Illinois Workers Compensation Act.

WHEREFORE Plaintiff moves this Honorable Court to find in his favor, and against Defendant, and award Plaintiff punitive damages in excess of FIFTY-THOUSAND DOLLARS (\$50,000.00), and all further relief as the Court finds necessary to fully punish the Defendant and deter others from engaging in similar conduct.

Respectfully Submitted,

By: /s/Jack Daugherty
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