IN THE ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

JANE DOE Plaintiff

 and

ACME CORPORATION Defendant

STATEMENT OF CLAIM

Defendant

1. The Plaintiff, Jane Doe, is an individual residing in Toronto, Ontario. She was employed by the Defendant from September 15, 2020, until her wrongful dismissal on March 31, 2024.
2. The Defendant, Acme Corporation, is a corporation incorporated under the laws of Ontario, with its head office located in Toronto, Ontario.
3. On September 15, 2020, the Plaintiff commenced employment with the Defendant as a Senior Marketing Manager. Her initial salary was $95,000 per annum.
4. On January 1, 2022, the Plaintiff received a promotion to Marketing Director, with her salary increasing to $120,000 per annum.
5. Throughout her employment, the Plaintiff consistently received positive performance reviews. Her most recent review, dated November 15, 2023, praised her leadership and innovative marketing strategies.
6. On February 14, 2024, the Plaintiff raised concerns about potential gender-based pay disparities within the marketing department. She submitted a formal complaint to Human Resources on February 20, 2024.
7. On March 1, 2024, the Plaintiff was informed that her position was under review as part of a company-wide restructuring initiative.
8. On March 15, 2024, the Plaintiff was asked to train a new male employee, John Smith, who had been hired on March 10, 2024.
9. On March 31, 2024, the Plaintiff was summarily dismissed without cause or proper notice. She was offered a severance package equivalent to 8 weeks' pay, which she declined on April 3, 2024.
10. The Plaintiff alleges that her dismissal was in retaliation for her complaint about gender-based pay disparities, filed on February 20, 2024.
11. As of the date of this claim, October 17, 2024, the Plaintiff has been unable to secure comparable employment despite diligent efforts since April 1, 2024.
12. The Plaintiff claims damages for wrongful dismissal, including:
a) 18 months' salary in lieu of notice, totaling $180,000;
b) Benefits continuation for 18 months, valued at $15,000;
c) Bonus payments for 2024 and 2025, estimated at $50,000;
d) Damages for bad faith in the manner of dismissal in the amount of $50,000.
13. The Plaintiff further claims general damages for discrimination and reprisal under the Ontario Human Rights Code in the amount of $25,000.
14. The Plaintiff requests that this Honourable Court grant judgment against the Defendant for the aforementioned amounts, plus pre-judgment and post-judgment interest pursuant to the Courts of Justice Act, and costs of this action on a substantial indemnity basis.

DATED at Toronto, this 17th day of October, 2024.[Signature]
Jane Doe, Plaintiff