

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON (SEATTLE)

RACHEL RASMUSSEN, an individual,

Plaintiff,

vs.

THE BOEING COMPANY, a Delaware
corporation,

Defendant.

CASE NO.:

COMPLAINT FOR DAMAGES

JURY DEMAND REQUESTED

I. NATURE OF THE CASE

1.1 Boeing has repeatedly betrayed its promise to value safety. Aircraft malfunctions are not Boeing’s only safety problem. Boeing has also allowed employees and supervisors in its Everett, Washington Facilities Department to harass and target transgender, gay, and female employees, including the sexual assault of Plaintiff Rachel Rasmussen. Boeing knows it has a culture problem. Boeing knows many employees are unsafe. But Boeing looked the other way, placing short-term profits over its employees and safety. This needs to stop.



1 1.2 Rachel, a transgender lesbian woman, worked hard and achieved good results
2 at Boeing from 1989 to 2024. For over 20 years, when she presented as male and used a male
3 name, Rachel felt safe. But that changed in 2010—when she began transitioning to live
4 consistent with her gender identity.



Rachel Rasmussen

5
6
7
8
9
10
11 1.3 **Over the next decade-plus**, many members of Rachel’s all-male Crane
12 Mechanic team **relentlessly harassed her** due to her gender, gender identity, and sexual
13 orientation (“Harassment”).
14



Rachel (third from left) and her all-male Crane Mechanic team (Appx. 2015)

15
16
17
18
19
20
21 1.4 Most notably, **a Boeing employee sexually assaulted Rachel with a broomstick**,
22 which Rachel reported to Boeing in stark terms:

23 I did not know McStotts was coming up behind me as I was in conversation. I felt something in my anus
24 and protrude through my vaginal lips and saw a stick come out in front of me. [. . .] I jumped out of
25 surprise and I could feel the stick catching between my legs when I was trying to get away. Raz yelled,
“What the fuck?” I said, “He just shoved that in my ass.” [. . .]

26 Excerpts from 2019 emails from Rasmussen to Boeing Human Resources reporting the assault
27

1 1.5 This sexual assault was, sadly, only a small snapshot of the decade-long
2 Harassment. Other examples include Boeing employees: (1) stealthily sneaking up behind
3 Rachel and groping her buttocks; (2) openly hurling homophobic slurs, including yelling “get
4 your hands off me fa*got” towards Rachel and others during a diversity “training”; (3)
5 dehumanizing Rachel by cornering her and demanding to know whether she had a “vagina or
6 penis”; (4) treating her like a carnival attraction, including asking whether she “pees standing
7 up”; (5) comparing transgender people to pedophiles—with at least six Boeing employees
8 openly endorsing this comparison; and (6) mocking Rachel’s gender identity, including one
9 saying he wanted to “self-identify as a horse”—as Rachel’s supervisor gazed on indifferently,
10 illustrating Boeing’s complicity. These examples illustrate the severe and pervasive Harassment
11 that Rachel endured for over a decade. To earn a living, she went to work scared and sickened.
12

13 1.6 As a jury will hear, Boeing Facilities Department’s **unsafe culture has had**
14 **devastating consequences for many employees**, not just Rachel. For example, a former
15 Facilities Department employee will testify that, despite being openly gay in the military, he felt
16 too unsafe to come out in Boeing’s Facilities Department. Further, a former employee will
17 testify she resigned to escape the “**completely unbridled transphobic, anti-woman culture.**”
18

19 1.7 For over a decade, Rachel combatted the Facilities Department’s toxic culture
20 by repeatedly reporting ongoing Harassment to Boeing, including the following emails:

21 **Truth be told, I am not doing well. For me work feels like an abusive relationship and I**
22 **know not where to turn.**

Excerpts from February 2015 email from Rasmussen to Boeing senior manager

23 **I just want to feel safe and valued, really. My first 20 years here as a straight**
24 **white guy was effortless. My last 10 as a lesbian trans-woman have been**
25 **filled with trauma and problems.**

Excerpt from June 2020 email from Rasmussen to Boeing Vice President

26 1.8 But, over and over, Boeing failed to provide a safe workplace or stop the
27 harassment. For example, Boeing **suspended the worker who sexually assaulted Rachel for a**

1 **single day**—the same punishment they gave Rachel for parking tickets. Additionally, in 2022,
2 Rachel begged Boeing to protect her after Boeing transferred her assailant back to her work
3 facility. Boeing refused. They did nothing. So, Rachel obtained a Protection Order. But, even
4 today, this assailant still works at Boeing—signaling to employees that harassment is accepted.

5
6 **Sexual Assault Protection Order** – The restrained person has subjected the
protected person to nonconsensual sexual conduct or nonconsensual sexual
penetration.

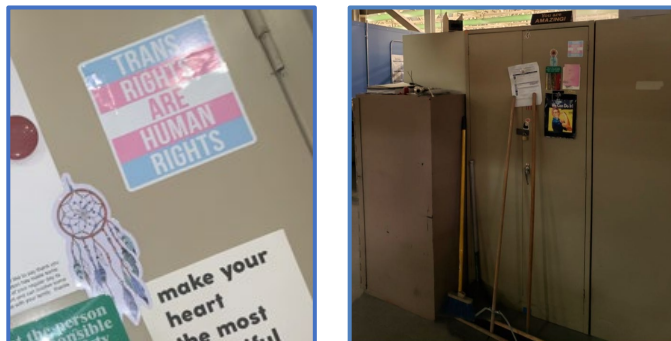
7 Excerpt of Snohomish County Superior Court Protection Order in favor of Rasmussen (8/29/2022)

8 1.9 Additionally, Boeing Human Resources violated their own policies, including by
9 condoning employees outing her as transgender despite Rachel’s pleas that it was unsafe:

10 Hello Rachel -- Thank you for sharing your concerns. With regard to people
11 communicating you are transgender it is not medical. Think of it as communicating an
identify trait; like identifying someone as African American or female, male, etc.
12 People may be curious; they may also be uncomfortable speaking directly with you
about being transgender. My role in this process is to make sure that people are not
13 engaging in inappropriate or offensive behavior.

14 Excerpt of 10/23/2013 email from Boeing Human Resources Investigator to Rasmussen

15 1.10 Boeing’s retaliatory culture also discouraged Rachel and other employees from
16 reporting the toxic, unsafe work environment. For example, after an employee placed a “Trans
17 Rights” sticker on their locker to protest Rachel’s sexual assault, other employees hammered
18 in her locker and ominously placed brooms—the item used to assault Rachel—in front of the
19 locker. The locker-owner reported the intimidation to Boeing. Boeing looked the other way.



26 Photographs showing brooms placed against locker with Trans Rights sticker

27 1.11 Further, Boeing managers did nothing when Facilities Department employees
hung a picture of a baby to mock employees who reported concerns as sensitive “babies”:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27



Photograph showing Boeing desk mocking those who reported concerns as “babies”

1.12 After more than a decade, Rachel could not take it anymore. To escape the Harassment, she transferred to a lower-paying non-union job at Boeing in November 2021. But Boeing eliminated her position in January 2024. Rachel applied for other jobs across Boeing, but the company retaliated by stonewalling her. Rather than protecting all employees and changing company culture, it was easier to force out the transgender lesbian woman.

1.13 Because Boeing continues to fail its employees, Rachel and other exemplary employees are leaving the company. This drain on the workforce is hurting Boeing’s product. And Boeing has harmed Rachel and others. This January 2021 medical note illustrates the trauma’s severity, including Rachel contemplating suicide:

Risk Factors
• Suicidal Ideation
Ct expressed sentiments of not wanting to live with the discrimination she lives with.

1/14/21 medical note regarding treatment of Rasmussen

1.14 Unfortunately, Rachel’s story is not unique. Across America and this state, gay, transgender, and female employees face harassment and unsafe conditions. Companies like Boeing need to change. The law demands that they provide a safe workplace so that all employees can thrive based on skill, without facing harassment because of who they are.

1.15 Plaintiff Rachel Rasmussen brings this lawsuit hoping her action will bring meaningful change to Boeing and other Washington workplaces. She pursues the following

1 legal claims: (1) hostile work environment due to gender, gender identity, and sexual
2 orientation under the Washington Law Against Discrimination (“WLAD”); and (2) retaliation for
3 opposing discrimination under the WLAD.

4 **II. PARTIES**

5 2.1 Plaintiff Rachel Rasmussen is an individual. At all times pertinent to this
6 Complaint, she was a resident of Snohomish County, Washington, domiciled therein. At all
7 times pertinent to this Complaint, she physically worked for Boeing within Snohomish County.

8 2.2 Defendant Boeing is a corporation. Boeing is incorporated under the laws of
9 Delaware. Boeing’s Principal Place of Business is in Virginia. Boeing is an “employer” within
10 the meaning of Title 49 RCW and the WLAD. Boeing currently transacts business in Snohomish
11 County. At all relevant times, Boeing transacted business in Snohomish County.

12 **III. JURISDICTION AND VENUE**

13 3.1 Because there is complete diversity between the parties and the amount in
14 controversy exceeds the amount specified in 28 U.S.C. § 1332(a), this Court has diversity
15 jurisdiction under 28 U.S.C. § 1332(a).
16

17 3.2 Venue is proper in the Western District of Washington at Seattle under 28 U.S.C.
18 § 1391 because a substantial part of the events that gave rise to this lawsuit occurred in
19 Snohomish County, Washington; Boeing transacts business in Snohomish County,
20 Washington; and Rasmussen physically worked for Boeing in Snohomish County, Washington.
21

22 **IV. FACTS**

23 4.1 Plaintiff incorporates the facts in the Nature of the Case section.

24 **A. For over thirty years, Rachel worked hard and performed well. Until 2010, she was
25 a valued member of the team.**

26 4.2 Rachel began working for Boeing in 1989.
27

1 4.3 In 1993, Rachel joined Boeing’s Facilities Department, also known as its Shared
2 Services Group.

3 4.4 In 2007, Boeing promoted Rachel to Crane Mechanic.

4 4.5 Getting this promotion was a significant accomplishment for Rachel. She took
5 immense pride in having steadily advanced through Boeing’s ranks.

6 4.6 As Crane Mechanic, Rachel consistently met expectations for her role.

7 4.7 Rachel, who then went by a male name and lived her life outwardly as a man,
8 was welcomed into the Crane Mechanic department by her peers and managers. Her all-male
9 team made her feel welcome. But that soon ended.
10

11 **B. When Rachel begins her physical gender transition in 2010, Boeing employees**
12 **and managers immediately begin harassing and excluding her. That harassment**
13 **continues unabated throughout her 2010-2021 Crane Mechanic tenure.**

14 4.8 During her 2010 to November 2021 tenure as a female Crane Mechanic, Rachel
15 consistently and regularly experienced unwelcome Harassment from Boeing employees and
16 managers.

17 4.9 In addition to the Harassment described in Paragraphs 1.5 & 1.6 above, the
18 frequent Harassment that co-workers and managers subjected Rachel to included: (7) Rachel’s
19 team members and manager placing a target on her back by regularly outing her as
20 transgender to new employees; (8) coworkers engaging in startling acts of intimidation,
21 including vandalizing Rachel’s property and shouldering against her in hallways; (9) Rachel’s
22 manager injecting anti-gay sentiment into the workplace, including telling homophobic
23 “jokes”; and (10) poisoning the work environment with open expressions of homophobia,
24 including yelling at her to support the barbaric anti-gay conversion therapy practice.

25 4.10 Additionally: (11) Rachel’s direct supervisor removing prestigious job duties;
26 (12) Rachel’s direct supervisor unfairly and unjustifiably targeting her with discipline; (13) co-
27

1 workers playing the song “Dude (Looks Like a Lady)” on repeat in front of Rachel; (14) workers
2 showing before-and-after pictures of Rachel around the workspace; (15) Rachel’s team leader
3 campaigning to remove her from the team; (16) employees and managers making repeated
4 anti-women comments; (17) employees and managers shunning and excluding Rachel to the
5 point that she felt unsafe; and (18) a coworker simulating how sex between a man and women
6 is “supposed” to work, using a nut and bolt.
7

8 4.11 Further, (19) Rachel’s team members consistently greeted her with open
9 hostility, including threatening glares and intimidating body language; (20) Rachel learned that
10 coworkers harassed and intimidated an employee who opposed anti-transgender harassment;
11 (21) coworkers posted on the Boeing employee forum with anti-transgender comments like
12 wanting to “self-identify as chickens or poultry”; (22) when Rachel asked to switch to a desired
13 dayshift, her supervisor prevented her from doing so—reasoning that Boeing would not protect
14 her; (23) coworkers and Rachel’s manager callously tormented Rachel by intentionally using
15 her dead name; and (24) in mid-March 2021, a co-worker said to Rachel that he wanted to “self-
16 identify as a horse” and a few weeks later yelled “fa**ot” towards Rachel and others. As was so
17 often the case, a Boeing manager observed the harassment but did nothing.
18

19 4.12 These are illustrative examples of the Harassment that Rachel experienced
20 throughout her 2010 to November 2021 tenure as a female Crane Mechanic. During that time,
21 Rachel’s direct supervisor and co-workers Harassed her approximately weekly, and at times
22 daily. Because the conduct was so pervasive, Rachel cannot recall each and every Harassing
23 comment or behavior that occurred over that time period.
24

25 **C. Rachel’s repeated reporting of Harassment and Boeing’s failure to take prompt or
26 effective remedial action.**

26 4.13 Boeing knew or should have known about the hostile work environment.

27 4.14 Boeing managers witnessed and participated in some of the Harassing conduct.

1 4.15 In addition, throughout her tenure as a Crane Mechanic, Rachel reported the
2 Harassment to Boeing managers and Human Resources.

3 4.16 Because she repeatedly reported Harassment to Boeing over more than a
4 decade, she cannot recall each and every incident she reported. But, overall, Rachel reported
5 Harassment to Boeing managers or Human Resources numerous times every year from 2010
6 to 2021, both verbally and in writing.

7 4.17 Although Boeing knew or should have known of the conduct underlying the
8 hostile work environment, they failed to take prompt or effective remedial action to stop the
9 harassment.

10 4.18 Indeed, Boeing's response to the Harassment often contributed to the hostile
11 work environment. By way of illustrative example:

12 **a. Rather than stopping the harassment, Boeing tells Rachel her fellow
13 workers need time to adjust to her being transgender.**

14 4.18.1 In August 2010, Rachel reported that Boeing workers were making anti-
15 transgender comments and that she felt unsafe, including in this email:

16 I have heard all the cruel things that are said behind the backs of those who have transitioned on the factory floor. . . . I'm
17 on a crew that hates the one female we have and can't even accommodate the one vegetarian for award dinners. What do
18 you really think will happen to the lone tranny? I'm not feeling well at all about being out.

19 Excerpts from 8/10/2010 email from Rasmussen to senior Boeing leader

20 4.18.2 Boeing did not address Rachel's concerns. Instead, around this time, Boeing
21 Human Resources told Rachel that they needed to give her fellow employees time to adjust to
22 Rachel being transgender.

23 4.18.3 This approach allowed the toxicity to fester and grow.

1 **c. Boeing condones managers and co-workers blackballing Rachel, which**
2 **creates an unsafe work environment.**

3 4.18.9 Many times throughout her Crane Mechanic tenure, Rachel reported concerns
4 that co-workers and managers were blackballing her, including refusing to work with her and
5 campaigning to have her removed from her team.

6 4.18.10 For example, Rachel sent the following email reporting stalking and
7 blackballing that felt like a “full scale war” to a senior Boeing manager:

8 This all started to change in 2011. At first it was subtle, I would be scrutinized by
9 management and some co-workers began to grow suspicious of me. By the end of
10 2011 in was caught in a full scale war, with management stalking me and my team lead
11 campaigning to have me removed from my crew. Our work group was split down the
12 middle, half would work with me and half would not. [. . .] You would think that 5
13 years later the behavior would settle, sadly it has not. People refuse to speak with me,
14 will not look me in the eye, and ask questions about me behind my back. [. . .] I am not
15 brave, honestly I’m terrified!

16 Excerpts from 10/18/2017 email from Rasmussen to senior Boeing leadership

17 4.18.11 But during Rachel’s Crane Mechanic tenure, Boeing Human Resources
18 minimized the Harassment, framing it as a “personality conflict,” including claiming that “we
19 can’t force employees to like you or speak to you.”

20 4.18.12 This created an environment where Rachel’s fellow employees felt comfortable
21 Harassing Rachel and treating her differently because of her gender identity.

22 **d. Boeing fails, giving sexual assault the same discipline as parking tickets**
23 **and forcing Rachel to continue working alongside her assailant.**

24 4.18.13 In 2019, Rachel reported to Boeing that her co-worker sexually assaulted her
25 with a broomstick.

26 4.18.14 In June 2019, Rachel reported more Harassment by the same employee:

27 Like my statement had said, this wasn’t the first time he touched me sexually. This action with the
broomstick was entirely different as it was much more sinister. [. . .] While he was out before your
investigation he sent me texts stating “god I miss you” and he referred to me as “honey”.

 He did this because he wanted to degrade, humiliate and undermine me in front of others. Me being a
transgender woman he was hoping that others looked down on me as much as he and they would find
his actions as acceptable as he did. I often find people will treat/say things to me they would never in a
million years say/do to another woman. This is but one example, and to date the most extreme I have
had to endure.

 Excerpt from June 2019 email from Rasmussen to Boeing Human Resources

1 4.18.15 Rachel reported to Boeing's CEO that the single-day suspension of her assailant
2 signaled to its employees that Boeing tolerates sexual assault:
3

4 I am disrespected and harassed regularly, making inclusion personal. I know all too well
5 what it feels like to "othered" in the workplace. The environment in SSG is so bad that
6 sexual assault is tolerated. Yea, my personal experience is that my punishment for a
7 parking violation was the same given to the man who sexually assaulted me.

8 Excerpt from June 2020 email to Boeing CEO David Calhoun

9 4.18.16 Rachel also reported concerns to Boeing that she was still being forced to
10 work in the same area as her assailant, including via this July 2019 email:
11

12 It has never been explained to me what my expectations are for having to work around the guy who
13 sexually harassed me? It happened again tonight, I needed supplies for a job I needed to work and he
14 started walking toward me. When talking with Bill Hartman it sounded as if management explained to
15 him that we are removed from each other. That is definitely not the arrangement that we are working
16 under. Can you help with this?

17 Excerpt from July 2019 email from Rasmussen to Boeing Human Resources

18 4.18.17 Almost a year later, Boeing finally transferred her assailant to a different facility.
19 Boeing admitted that Rachel should not have been exposed to her assailant and apologized.
20

21 4.18.18 But then, in late 2022, Boeing transferred Rachel's assailant back to the same
22 Everett facility that Rachel worked in. The risk of being exposed to him was terrifying.
23

24 4.18.19 Because Boeing would not protect her, Rachel was forced to obtain a Sexual
25 Assault Protection Order from Snohomish County Superior Court.
26

27 4.18.20 Boeing transferring her assailant back to her work facility and forcing her to go
to the courts to obtain protection contributed to the hostile work environment.

e. Boeing does not ensure disciplinary processes designed to stop future harassment.

4.18.21 Boeing's disciplinary procedures do not adequately protect victims of harassment or deter future harassment. Because of this, even when Boeing "acts," it unreasonably falls short.

4.18.22 For example, in 2021, Boeing temporarily fired—but then reinstated—two of Rachel's harassers: one employee who told Rachel he could not support gay people and a few

1 days later approached Rachel from behind, shouted at her to scare her, and told her that she
2 was not tough enough to survive; and a second employee who used the slur “fa**ot” and made
3 anti-transgender comments.

4 4.18.23 Ultimately, because of Boeing’s decade-long failure to take prompt or effective
5 remedial action, Boeing’s arbitrators reinstated both employees with backpay.

6 4.18.24 Boeing’s arbitrator reinstated the first employee because Boeing only
7 disciplined him for the anti-gay remark. Because Boeing refused to discipline the harasser for
8 intentionally intimidating Rachel, the arbitrator was prevented from considering that
9 reprehensible conduct. That arbitrator also reasoned that Boeing’s “very limited investigation”
10 had deprived him of necessary evidence. If Boeing had conducted an adequate investigation
11 and disciplined the employee for all the Harassment, he would no longer work there today.

12 4.18.25 Boeing’s arbitrator reinstated the second employee because Boeing had
13 known about other Harassing conduct by that employee—but failed to issue any warnings or
14 discipline. The arbitrator reasoned that, if Boeing had issued progressive discipline instead of
15 ignoring his past conduct, the employee would have known his conduct was unacceptable and
16 Boeing could have terminated him. This illustrates Boeing’s repeated system failures.

17 4.18.26 Additionally, Boeing did nothing to challenge the arbitrators’ decisions—even
18 though courts will vacate arbitration awards that do not impose sufficient discipline to end
19 current harassment and prevent future harassment. Boeing’s failure to appeal signaled that the
20 company was not fully committed to doing everything reasonably necessary to eradicate
21 discrimination and deter harassment.

22 4.18.27 Because Boeing unreasonably botched this discipline, both still work at Boeing
23 today, alongside the employee who sexually assaulted Rachel. This signals to everyone:
24 harassment is tolerated at Boeing.
25
26
27

1 **D. After more than a decade, Rachel leaves her position to escape the Harassment.**

2 4.19 After more than a decade, Rachel lost hope. She believed Boeing's repeated
3 system failures created an environment where people felt free to Harass her.

4 4.20 So, to escape, Rachel transferred to a lower-paying Diversity, Equity, and
5 Inclusion position at Boeing in November 2021. The position was intended to encourage more
6 women to join Boeing's workforce.

7 4.21 To protect herself, Rachel had to change jobs, give up pay, and abandon the
8 security of her union job and her decades of seniority.

9 4.22 Forcing the harassed to transfer to escape harassment is not prompt and
10 effective remedial action.

11 4.23 Even there, the Harassment did not stop completely. For example, in February
12 2022, Rachel witnessed Boeing workers compare transgender people to pedophiles and
13 "joke" about wanting to "self-identity as poultry."
14

15 **E. Boeing eliminates Rachel's position. They stonewall her attempts to apply
16 elsewhere. These actions are retaliatory.**

17 4.24 In January 2024, Boeing eliminated Rachel's new job position.

18 4.25 Rachel diligently applied for jobs she was qualified for across Boeing over the
19 next month.

20 4.26 In total, Rachel applied for at least 29 jobs at Boeing that she was qualified for.

21 4.27 But Boeing refused to hire her in anything but entry-level positions, including
22 refusing to offer her many jobs for which she was overqualified.

23 4.28 Rather than changing its culture to emphasize safety, Boeing forced out a good
24 employee who refused to stay silent about employee rights.
25
26
27

V. FIRST CAUSE OF ACTION:

HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE WLAD

5.1 Plaintiff alleges the paragraphs above as if fully set forth herein.

5.2 Boeing employees and managers subjected Plaintiff Rachel Rasmussen to unwelcome conduct and language because of her gender, gender identity, and sexual orientation that was so severe or pervasive that it altered the conditions of her employment.

5.3 A manager participated in the Harassment.

5.4 Boeing management knew or should have known of the hostile work environment because it was so pervasive or through other circumstances, including Rachel's repeated reports of Harassment.

5.5 Boeing failed to take reasonably prompt and effective remedial measures designed to end the hostile work environment.

5.6 As a direct result of Boeing's unlawful conduct, Rachel has suffered and continues to suffer emotional harm, including grief, loss of enjoyment of life, damage to reputation, fear, anxiety, anguish, embarrassment, humiliation, and other damages in amounts to be proved at trial. These harms are ongoing and are reasonably likely to be experienced in the future.

VI. SECOND CAUSE OF ACTION:

RETALIATION IN VIOLATION OF THE WLAD

6.1 Plaintiff realleges paragraphs above as if fully set forth herein.

6.2 Plaintiff Rachel Rasmussen took several actions protected by the WLAD, including, without limitation, reporting Harassment on numerous occasions, as described above.

6.3 Boeing knew or suspected that Rachel engaged in these statutorily protected

1 activities.

2 6.4 Boeing subjected Rachel to many adverse employment actions (i.e., an
3 employment action that well might have discouraged a reasonable worker from engaging in
4 protected activity), including without limitation, permitting a hostile work environment,
5 eliminating Rachel's new job, and refusing to hire Rachel in comparable open positions.

6 6.5 Plaintiff's protected activity was a substantial factor in these adverse
7 employment actions.
8

9 6.6 As a direct result of Boeing's unlawful conduct, Rachel has suffered and
10 continues to suffer lost wages and pecuniary benefits of her employment, future lost earnings,
11 and emotional harm, including grief, loss of enjoyment of life, damage to reputation, fear,
12 anxiety, anguish, embarrassment, humiliation, and other damages in amounts to be proved at
13 trial. These harms are ongoing and are reasonably likely to be experienced in the future.

14 **VII. PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff prays that the Court enter judgment against Boeing, awarding:

16 1. Lost wages, including front and back pay and other lost pecuniary benefits of
17 employment, in an amount to be proven at trial;

18 2. Compensatory damages for non-economic harm in an amount to be proven at
19 trial;

20 3. Reasonable attorneys' fees, expert witness fees, and costs pursuant to, among
21 other things, RCW 49.60.030(2) and 49.48.030;

22 4. Pre- and post-judgment interest at the maximum rate allowed by law;

23 5. Damages to make up for any adverse tax consequences for any award to
24 Plaintiff; and
25

26 6. Such other relief as this Court may deem appropriate.
27

