

**IN THE CIRCUIT COURT OF ST. CHARLES COUNTY
STATE OF MISSOURI**

LAJUANA HAYNES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No.:
	)	
GENERAL MOTORS LLC,	)	Division No.:
	)	
Serve:	)	
	)	
CSC-LAWYERS INCORPORATING	)	
SERVICE COMPANY	)	
221 Bolivar Street	)	
Jefferson City, MO 65101	)	
	)	
Defendant.	)	JURY TRIAL DEMANDED

PETITION FOR DAMAGES

COMES NOW Plaintiff LaJuana Haynes, by and through her attorneys, and for her Petition for Damages against Defendant General Motors LLC (General Motors) states as follows:

INTRODUCTION

1. This matter arises under the Missouri Human Rights Act (MHRA), § 213.010 *et. seq.* Plaintiff Haynes was subjected to discrimination based on her disability and age, and retaliation during her employment at General Motors, including the termination of her employment in February 2026.

PARTIES

2. Plaintiff Haynes is a female, 62 year old citizen and resident of the State of Missouri.

3. Defendant General Motors LLC is an organization or corporation operating in the state of Missouri. Defendant has the capacity to sue and be sued and is located in St. Charles County, Missouri.

4. All facts giving rise to this cause of action occurred in or about St. Charles County, Missouri.

JURISDICTION AND VENUE

5. Venue in this Court is proper pursuant to Mo. Rev. Stat. § 508.010 and Mo. Rev. Stat. § 213.111.1.

6. On or about November 3, 2025, Plaintiff timely filed a charge of discrimination with the MCHR. The MCHR docketed Plaintiff's charge as E-11/25-57525 / 28E-2026-00094.

7. On May 12, 2026, the MCHR issued a Notice of Right to Sue for the above charge. A copy of the Notice is attached hereto as Exhibit 1.

8. Plaintiff has filed this action within ninety (90) days from the date on the Notice and within two (2) years of the last act of discrimination.

FACTS APPLICABLE TO ALL COUNTS

9. Plaintiff Haynes worked for Defendant General Motors from approximately December 2011 until the termination of her employment in February 2026.

10. Plaintiff's position was Third Shift Business Manager at the Wentzville Assembly Center, which she held through the end of her employment.

11. Plaintiff Haynes reported to Saleem Hinton during her employment.

12. During her employment with Defendant, Plaintiff Haynes performed her job duties and responsibilities in a satisfactory manner.

13. Plaintiff Haynes's annual performance review in February 2025 was excellent and complimentary.

14. Plaintiff Haynes has the medical condition of anxiety.

15. Plaintiff's condition substantially affects one or more of Plaintiff's major life activities, including but not limited to sleeping, working, and concentration.

16. Plaintiff informed Defendant of her condition.

17. In March 2025, Plaintiff's mother passed away, and Plaintiff took five days of bereavement leave and six days of vacation.

18. Plaintiff requested one additional day of leave. Hinton denied Plaintiff's request, stating that she had to cover the shift of a younger woman.

19. Plaintiff took the extra day and returned to work on March 25, 2025.

20. On or about March 27, 2025, Defendant issued Plaintiff a warning for failure to comply with her job duties by not providing adequate coverage.

21. Later that day, Plaintiff's supervisor, Saleem Hinton, verbally attacked Plaintiff and accused her of undermining decisions with other Third Shift Group Leaders. Plaintiff became emotional and requested a medical pass.

22. Plaintiff took medical leave from March 27 to April 27, 2025 due to anxiety and/or stress.

23. After Plaintiff's return from medical leave, Hinton told Plaintiff she was "not making him look good" and was "ruining his reputation" because the document she completed asking for medical leave due to stress was sent around the plant.

24. Plaintiff did not show other coworkers her document requesting medical leave and does not know who did so.

25. On or about April 29, 2025, Plaintiff sent a letter to Human Resources at Defendant, requesting assistance regarding the conduct of her supervisor Saleem Hinton. Defendant took no effective remedial action.

26. During Plaintiff's employment, her supervisor, Saleem Hinton, joked about Plaintiff being his "Auntie."

27. On information and belief, during Plaintiff's employment, Director Zerick Pierce stated that he wanted a younger person in Plaintiff's role.

28. Director Pierce told Plaintiff on one or more occasions that Plaintiff is at the age where she wants an office job. Management offered Plaintiff the office job of Planner.

29. On information and belief, Defendant wanted to put a younger female employee in Plaintiff's job of Third Shift Business Unit Manager and move Plaintiff to the First Shift Planner position.

30. On or about June 18, 2025, Plaintiff received a sub-par or poor quarterly performance review from Hinton. In contrast, Plaintiff's annual review in February 2025 had been excellent and complimentary.

31. On or about July 18, 2025, Plaintiff sent a letter to Defendant about Hinton's behavior and requested an investigation into the poor mid-year review Hinton issued to her. In that letter, Plaintiff also reported that Hinton and Group Leader Kamon Lawrence condoned or engaged in sexual harassment in the workplace.

32. On or about September 23, 2025, Defendant gave Plaintiff the option of being placed on a 30-day Performance Improvement Plan (PIP) or accepting a Mutual Separation Agreement (MSA).

33. On or about September 24, 2025, Plaintiff requested another medical leave due to anxiety and/or stress. Plaintiff's short-term disability was denied on October 31, 2025.

34. On information and belief, Hinton has previously called disability leave insurer Sedgewick and instructed it to deny disability leave for other employees in the past.

35. Plaintiff initially signed the MSA, then retracted her agreement on September 30, 2025.

36. Defendant told Plaintiff she would be discharged on October 14, 2025, but that did not occur.

37. On or about November 6, 2025, Defendant again offered Plaintiff the Mutual Separation Agreement (MSA).

38. Defendant indicated the Planner position was no longer an option for Plaintiff.

39. On or about February 3 2026, Defendant sent Plaintiff a letter stating her employment had ended October 31, 2025, and terminated Plaintiff's employment.

VIOLATIONS OF LAW

Count I **Disability Discrimination**

39. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

40. Plaintiff is a person with a disability, and therefore a member of a protected group under § 213.010(5) R.S.Mo.

41. Defendant is a person subject to liability and an employer as defined by § 213.010(8) R.S.Mo.

42. Plaintiff has a disability that substantially impairs one or more major life activities.

43. Defendant was aware of Plaintiff's disability.

44. Defendant regarded Plaintiff as disabled.

45. Defendant took negative employment actions against Plaintiff during her employment, as described above.

46. Plaintiff's disability was a motivating factor in Defendant's actions against her.

47. Defendant's actions have caused Plaintiff Haynes to suffer lost compensation and benefits of employment, emotional distress, and attorneys' fees.

48. Defendant's actions constituted disability discrimination in violation of the MHRA, § 213.055 R.S.Mo.

49. Defendant's actions were outrageous and were undertaken maliciously and/or in reckless disregard for Plaintiff's right to be free from discrimination.

WHEREFORE, Plaintiff prays that this Court, after trial by jury, finds for Plaintiff LaJuana Haynes and against Defendant General Motors in Plaintiff's claim for disability discrimination, and enter judgment for Plaintiff in excess of \$25,000 for Plaintiff's lost wages and benefits, emotional distress, punitive damages, pre-judgment interest, post-judgment interest, attorney's fees, and costs of litigation, and such other relief that this Court deems just and proper.

Count II
Age Discrimination

51. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

52. Plaintiff Haynes is over the age of forty (40), and therefore a member of a protected group under § 213.010(1) R.S.Mo.

53. Defendant is a person subject to liability and an employer as defined by § 213.010(8) R.S.Mo.

54. During her employment with Defendant, Plaintiff was subjected to age-based comments and conduct, including her supervisor joking that Plaintiff was his “Auntie” and Director Pierce stating he wanted a younger person in Plaintiff’s role.

55. Director Pierce told Plaintiff on one or more occasions that she was at the age where she wants an office job, and Defendant attempted to move Plaintiff to a lesser position in order to place a younger employee in Plaintiff’s role.

56. Defendant took negative employment actions against Plaintiff during her employment, as described above.

57. Plaintiff’s age was a motivating factor in Defendant’s actions against her.

58. Defendant’s actions have caused Plaintiff Haynes to suffer lost compensation and benefits of employment, emotional distress, and attorneys’ fees.

59. Defendant’s actions constituted age discrimination in violation of the MHRA, § 213.055 R.S.Mo.

60. Defendant’s actions were outrageous and were undertaken maliciously and/or in reckless disregard for Plaintiff’s right to be free from discrimination.

WHEREFORE, Plaintiff prays that this Court, after trial by jury, finds for Plaintiff LaJuana Haynes and against Defendant General Motors in Plaintiff’s claim for age discrimination, and enter judgment for Plaintiff in excess of \$25,000 for Plaintiff’s lost wages and benefits, emotional distress, punitive damages, pre-judgment interest, post-judgment interest, attorney’s fees, and costs of litigation, and such other relief that this Court deems just and proper.

Count III **Retaliation**

62. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

63. During her employment, Plaintiff made complaints that Defendant was discriminating against her because of her disability, and also reported sexual harassment in the workplace.

64. Plaintiff's complaints to Defendant constituted protected activity.

65. Defendant then terminated Plaintiff's employment.

66. Defendant took negative employment actions against Plaintiff during her employment, as described above.

67. Plaintiff's protected activity was a motivating factor in Defendant's actions against her.

68. Defendant's actions have caused Plaintiff Haynes to suffer lost compensation and benefits of employment, emotional distress, and attorneys' fees.

69. Defendant's actions constituted retaliation in violation of the MHRA, § 213.070 R.S.Mo.

70. Defendant's actions were outrageous and were undertaken maliciously and/or in reckless disregard for Plaintiff's right to be free from discrimination.

WHEREFORE, Plaintiff prays that this Court, after trial by jury, finds for Plaintiff LaJuana Haynes and against Defendant General Motors in Plaintiff's claim for retaliation, and enter judgment for Plaintiff in excess of \$25,000 for Plaintiff's lost wages and benefits, emotional distress, punitive damages, pre-judgment interest, post-judgment interest, attorney's fees, and costs of litigation, and such other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

71. Plaintiff demands a trial by jury on all issues triable by jury.

Respectfully Submitted,

KENNEDY HUNT, P.C.

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