

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC
SCHOOLS, PRINCE GEORGE'S COUNTY
BOARD OF EDUCATION, and MONICA
GOLDSOIN in her official capacity

Defendants.

Case Number: 18-cv-03649-TDC/TJS

**PLAINTIFF JENNIFER ELLER'S MOTION FOR PARTIAL SUMMARY JUDGMENT
AND OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Jennifer Eller, by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 56, hereby files this Motion for Partial Summary Judgment and Opposition to Defendants' Motion for Summary Judgment. Plaintiff respectfully requests that the Court grant her Motion and more specifically: (i) grant summary judgment in Plaintiff's favor with respect to her hostile work environment and constructive discharge claims (Counts II-V); (ii) grant summary judgment in Plaintiff's favor with respect to Defendants' third through sixth affirmative defenses, including statute of limitations, failure to exhaust administrative remedies, at-will doctrine, and voluntary resignation; (iii) deny Defendant's Motion for Summary Judgment (ECF 97) in its entirety; and (iv) grant such other relief as is appropriate. Plaintiff's request, and the basis for such request, are more fully set out in the accompanying Memorandum of Law.

Dated: April 28, 2021

/s/ Omar Gonzalez-Pagan

Omar Gonzalez-Pagan
(admitted *pro hac vice*)
Carl Charles (admitted *pro hac vice*)
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
120 Wall Street, 19th Floor
New York, NY 10005
Telephone: (212) 809-8585
Fax: (212) 809-0055
ogonzalez-pagan@lambdalegal.org
ccharles@lambdalegal.org

Respectfully submitted,

/s/ Elliott C. Mogul

Paul Pompeo (admitted *pro hac vice*)
Douglas Curtis (admitted *pro hac vice*)
Lori B. Leskin (admitted *pro hac vice*)
Elliott Mogul (admitted *pro hac vice*)
Thomas McSorley (No. 18609)
Rebecca Neubauer (admitted *pro hac vice*)
ARNOLD & PORTER
KAYE SCHOLER LLP
601 Massachusetts Ave., NW
Washington, DC 20001-3743
Telephone: +1 202.942.5000
Fax: +1 202.942.5999
paul.pompeo@arnoldporter.com
douglas.curtis@arnoldporter.com
lori.leskin@arnoldporter.com
elliott.mogul@arnoldporter.com
tom.mcsorley@arnoldporter.com
rebecca.neubauer@arnoldporter.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2021, I caused a true and correct copy of the foregoing document and its accompanying Memorandum of Law to be served via the Court's CM/ECF system on the following counsel of record for Defendants:

James E. McCollum, Jr.
Amit K. Sharma
McCollum & Associates, LLC
7309 Baltimore Avenue, Suite 117
College Park, Maryland 20740
Tel: (301) 864-6070
Fax: (301) 864-4351
jmccollum@jmlaw.net
asharma@jmlaw.net

/s/ Elliott C. Mogul
Elliott C. Mogul