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2 **THE HACKETT LAW FIRM**
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6 *Attorneys for Plaintiff Chloe Anderson*

**ELECTRONICALLY
FILED**
*Superior Court of California,
County of San Francisco*

03/28/2024
Clerk of the Court
BY: AUSTIN LAM
Deputy Clerk

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF SAN FRANCISCO

9 CHLOE ANDERSON,

10 Plaintiff,

11 v.

12 STITCH FIX, INC. and DOES 1 through 10,
13 inclusive,

14 Defendants.

Case No.:

CGC-24-613458

COMPLAINT FOR DAMAGES

1. DISPARATE TREATMENT IN VIOLATION OF GOV. CODE § 12940 subd. (a)
2. CONSTRUCTIVE DISCHARGE

DEMAND FOR JURY TRIAL

16
17 **TO THE HONORABLE JUDGE OF THE SUPERIOR COURT, AND TO THE**
18 **ABOVE-NAMED DEFENDANTS, THROUGH THEIR ATTORNEYS OF RECORD:**

19 Plaintiff Chloe Anderson (“Plaintiff”) alleges as follows on the information and belief.

20 **THE PARTIES**

21 1. Plaintiff was, at all material times mentioned herein, an individual residing in the State
22 of California.

23 2. Defendant Stitch Fix, Inc. is a corporation formed under the laws of the State of
24 California with its principal address at 1 Montgomery Street, Suite 1500, San Francisco, CA 94104.
25 Stitch Fix, Inc. is an employer within the meaning of California Fair Employment and Housing Act
26 (“FEHA”) and regularly employs five (5) or more persons and is therefore subject to the jurisdiction
27 of this Court.

28 //

1 11. Plaintiff accepted Defendants’ employment offer because she relied on Defendants’
2 representations that her position was remote-eligible. Defendants’ employees with remote-eligible
3 positions could work anywhere in the United States. This was known as the “Work Anywhere in the
4 U.S.” policy (“Policy”).

5 12. During her employment with Defendants, Plaintiff maintained an impeccable
6 performance record. Defendants’ Vice President and senior leaders celebrated her contributions and
7 wrote her strong talent reviews. One leader even referred to her as the ‘best business partner’ that
8 they have ever worked with.

9 13. Plaintiff received assurances from Diana Rasmussen, the Chief People Officer that she
10 was ready for a promotion.

11 14. During Plaintiff’s employment with Defendants, Plaintiff was given an opportunity to
12 discuss areas of growth within the Organization. Within days of the discussion, Plaintiff was
13 contacted by her manager Sara Fenn (“Fenn”) who demanded that Plaintiff relinquish her role within
14 the Organization.

15 15. On or about March 2023, Plaintiff made the decision to relocate to Hawaii and utilize
16 Defendants’ Policy.

17 16. Plaintiff consulted with Defendants on how to utilize the Policy. During this time, she
18 also witnessed other remote-eligible employees relocated based on the Policy.

19 17. On or about March 10, 2023, Plaintiff was contacted by Fenn who reprimanded her for
20 going “around” and circumventing Defendants’ policies by attempting to relocate to Hawaii.

21 18. Shortly after, Plaintiff was contacted by Defendants that she could not relocate to
22 Hawaii because it was an exception to the Policy. This was the first time that Plaintiff heard about the
23 exception.

24 19. On or about March 14, 2023, Plaintiff was contacted again by Fenn who gave her an
25 ultimatum. Fenn asked her to submit a letter of resignation. Plaintiff was shocked and under immense
26 pressure from the intolerable working conditions that Defendants created.

27 20. Due to the intolerable pressure and hostility from Defendants, Plaintiff was forced to
28 resign on or about April 2023.

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REQUEST FOR JURY TRIAL

Plaintiff Chloe Anderson requests a trial of all issues by jury.

DATED: March 28, 2024

THE HACKETT LAW FIRM

By: *Dylan Hackett*
Dylan Hackett
Attorney for Plaintiff Chloe Anderson

EXHIBIT A



Civil Rights Department

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

September 25, 2023

Chloe Anderson
85-175 Farrington Hwy B124
Waianae, HI

RE: **Notice to Complainant**
CRD Matter Number: 202309-22100626
Right to Sue: Anderson / Stitch Fix

Dear Chloe Anderson:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. If you do not have an attorney, you must serve the complaint yourself. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

KEVIN KISH, DIRECTOR

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September 25, 2023

RE: **Notice of Filing of Discrimination Complaint**
CRD Matter Number: 202309-22100626
Right to Sue: Anderson / Stitch Fix

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

KEVIN KISH, DIRECTOR

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September 25, 2023

Chloe Anderson
85-175 Farrington Hwy B124
Waianae, HI

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202309-22100626
Right to Sue: Anderson / Stitch Fix

Dear Chloe Anderson:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective September 25, 2023 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

1 **COMPLAINT OF EMPLOYMENT DISCRIMINATION**
2 **BEFORE THE STATE OF CALIFORNIA**
3 **Civil Rights Department**
4 **Under the California Fair Employment and Housing Act**
5 **(Gov. Code, § 12900 et seq.)**

6 **In the Matter of the Complaint of**

7 Chloe Anderson

CRD No. 202309-22100626

Complainant,

vs.

8 Stitch Fix
9 1 Montgomery St, Suite 1500
10 San Francisco, CA 94104

Respondents

11 _____
12 1. Respondent **Stitch Fix** is an **employer** subject to suit under the California Fair Employment
13 and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

14
15 2. Complainant **Chloe Anderson**, resides in the City of **Waianae**, State of **HI**.

16
17 3. Complainant alleges that on or about **April 6, 2023**, respondent took the following
18 adverse actions:

19 **Complainant was harassed** because of complainant's ancestry, national origin (includes
20 language restrictions), marital status.

21 **Complainant was discriminated against** because of complainant's ancestry, national
22 origin (includes language restrictions), marital status and as a result of the discrimination
23 was forced to quit, denied hire or promotion, reprimanded, denied or forced to transfer.

24 **Complainant experienced retaliation** because complainant reported or resisted any form
25 of discrimination or harassment, participated as a witness in a discrimination or harassment
26 complaint and as a result was forced to quit, denied hire or promotion, reprimanded, denied
27 or forced to transfer.

28 **Additional Complaint Details:**

1 VERIFICATION

2 I, **Chloe Anderson**, am the **Complainant** in the above-entitled complaint. I have read
3 the foregoing complaint and know the contents thereof. The same is true of my own
4 knowledge, except as to those matters which are therein alleged on information and
belief, and as to those matters, I believe it to be true.

5 On September 25, 2023, I declare under penalty of perjury under the laws of the State
6 of California that the foregoing is true and correct.

7 **Waianae, HI**

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Complaint – CRD No. 202309-22100626

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Date Filed: September 25, 2023

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