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M.D. Fla. (Ocala Division)
Greiner v. Spacelabs Healthcare, LLC
No. 5:26-cv-00611

FIRST AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Colleen Greiner ("Plaintiff") sues Spacelabs Healthcare, LLC ("Spacelabs") and OSI Systems, Inc. ("OSI") and alleges:

PRELIMINARY STATEMENT

1. On July 1, 2025, Adam Martin terminated Plaintiff's employment at Spacelabs. Plaintiff was 59 years old. In a work history of more than 40 years, no employer had questioned Plaintiff's performance until Martin became Plaintiff's manager.

2. Martin is a man. Martin is substantially younger than Plaintiff. Plaintiff was the oldest person on Martin's team. When Plaintiff spoke in meetings, Martin rolled his eyes. Martin sighed. Martin showed disinterest and irritation. Martin did not treat Plaintiff's male co-workers that way. Martin did not treat Plaintiff's younger co-workers that way.

3. Twice Plaintiff met with Martin about Martin's conduct toward her. Twice, within days, Martin answered with criticism of Plaintiff's performance. On April 4, 2025, Martin placed Plaintiff on a performance improvement plan. Plaintiff told Spacelabs' human resources manager that Martin treated her that way because she was the oldest person on the team and because she is a woman. Plaintiff asked for an investigation. The answer came the next day: the plan "will remain in effect."

4. Plaintiff then wrote to Martin's manager. Plaintiff wrote to Glenn Grindstaff, the chief human resource officer of OSI, Spacelabs' parent company, that she was "an almost 60 year old, mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions." Grindstaff replied, "I'll look into it." Plaintiff complained to Spacelabs' new president. About two weeks later, Martin terminated Plaintiff's employment.

5. Plaintiff brings this action under Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, and the Florida Civil Rights Act of 1992 for discrimination because of sex, discrimination because of age, and retaliation.

I. JURISDICTION AND VENUE

6. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343(a)(4).

7. Counts IV, V, XI, and XII arise under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. ("Title VII").

8. Counts VI, VII, XIII, and XIV arise under the Age Discrimination in Employment Act of 1967, 29 U.S.C. § 621 et seq. ("the ADEA").

9. Counts I, II, III, VIII, IX, and X arise under the Florida Civil Rights Act of 1992, Fla. Stat. § 760.01 et seq. ("the FCRA"). This Court has supplemental jurisdiction over those counts under 28 U.S.C. § 1367(a). The FCRA counts arise from the same employment, the same complaints, and the same termination as the Title VII and ADEA counts.

10. Venue is proper in this district under 28 U.S.C. § 1391(b)(2). Plaintiff worked for Spacelabs in Lake County, Florida. A substantial part of the events alleged

in this pleading occurred in this district.

11. Venue is also proper under 42 U.S.C. § 2000e-5(f)(3). The unlawful employment practices alleged in Counts IV, V, XI, and XII were committed in this district.

II. PARTIES

12. Plaintiff is a natural person who resides in Sumter County, Florida.

13. Plaintiff is female.

14. Plaintiff was 59 years old on July 1, 2025.

15. Spacelabs is a limited liability company organized under the laws of the State of Washington. Spacelabs' principal place of business is in the State of Washington.

16. Spacelabs is sued as Plaintiff's employer.

17. OSI is a corporation organized under the laws of the State of Delaware. OSI's principal place of business is in the State of California.

18. OSI is sued as Plaintiff's employer.

III. EMPLOYMENT AND COVERAGE

A. Spacelabs

19. Plaintiff joined Spacelabs as part of the PeraHealth/Rothman Index acquisition.

20. Plaintiff worked for Spacelabs from on or about February 1, 2023 until July 1, 2025.

21. Plaintiff worked in sales for Spacelabs' Rothman Index business.

22. Spacelabs issued Plaintiff an email address on the spacelabs.com domain.

23. More than one year before June 1, 2025, Adam Martin ("Martin") became Plaintiff's direct manager at Spacelabs. Martin remained Plaintiff's direct manager through July 1, 2025.

24. Scott Iserman ("Iserman") was Martin's manager and Spacelabs' Vice President of Sales.

25. Kerry Stevenson ("Stevenson") was a Senior Human Resources Manager for Spacelabs.

26. In June 2025, Wilson Constantine ("Constantine") was the new President of Spacelabs.

27. Spacelabs sells its products, including the Rothman Index, through a sales organization led by a Vice President of Sales. Spacelabs is engaged in an industry affecting commerce.

28. Spacelabs employs 20 or more employees. Spacelabs is an "employer" within the meaning of 42 U.S.C. § 2000e(b), 29 U.S.C. § 630(b), and Fla. Stat. § 760.02(7).

B. OSI

29. Spacelabs is a wholly owned subsidiary of OSI.

30. Glenn Grindstaff ("Grindstaff") was OSI's Chief Human Resource Officer in June 2025.

31. On June 1, 2025 and on or about June 7, 2025, Plaintiff, a Spacelabs employee, sent complaints about Martin and the PIP to Grindstaff at OSI. Grindstaff responded to each. Those complaints and responses are described in Section VII.C.

32. OSI employs 20 or more employees. OSI is engaged in an industry

affecting commerce.

33. OSI is an "employer" within the meaning of 42 U.S.C. § 2000e(b), 29 U.S.C. § 630(b), and Fla. Stat. § 760.02(7).

34. With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer.

IV. PLAINTIFF'S WORK HISTORY

35. Plaintiff's work history before July 1, 2025 spanned more than 40 years.

36. Plaintiff is a veteran.

37. Before Spacelabs, Plaintiff worked for more than 18 years for a Fortune 15 company.

38. At that company, Plaintiff served as a Vice President of Sales. Plaintiff led a team of 250 sales representatives. Plaintiff was responsible for an annual budget of one billion dollars.

39. During the transition that followed the PeraHealth/Rothman Index acquisition, several PeraHealth employees left. Those departures shifted Plaintiff into filling the gap they left.

40. Before Martin became Plaintiff's manager, no employer had questioned Plaintiff's performance.

V. MARTIN'S CONDUCT TOWARD PLAINTIFF

A. Martin's treatment of Plaintiff

41. When Plaintiff gave information or input in meetings, Martin rolled his eyes.

42. When Plaintiff spoke in meetings, Martin sighed.

43. When Plaintiff spoke in meetings, Martin displayed disinterest and irritation.

44. Martin's treatment of Plaintiff included a lack of communication and a lack of support.

45. During the year before June 1, 2025, Plaintiff scheduled two formal meetings with Martin. In those meetings, Plaintiff reviewed Martin's conduct toward her, including the eye rolling, the sighing, and the lack of communication and support.

46. After each of those two meetings, within days, Martin cited performance issues to Plaintiff.

47. In or before June 2025, Martin stated that because he is a white male he could drive business, while it would be difficult for a black male to do so.

B. Sex

48. Martin is male.

49. Martin did not roll his eyes, sigh, or display disinterest or irritation when Plaintiff's male co-workers spoke in meetings.

C. Age

50. Martin is substantially younger than Plaintiff.

51. Plaintiff was the oldest person on Martin's team.

52. Martin did not roll his eyes, sigh, or display disinterest or irritation when Plaintiff's younger co-workers spoke in meetings.

53. Upon information and belief, Spacelabs filled Plaintiff's position with a substantially younger employee after July 1, 2025.

VI. THE PIP

54. On April 4, 2025, Martin presented Plaintiff with a performance improvement plan ("the PIP"). Stevenson attended and participated in the presentation.

55. The PIP's statements about Plaintiff's performance were not accurate.

56. The PIP listed, under "Actions Expected," an item to "engage in regular performance reviews."

57. Martin scheduled PIP action-plan meetings with Plaintiff. The meetings were weekly.

58. The PIP remained in effect from April 4, 2025 through July 1, 2025.

59. After April 15, 2025, Plaintiff attended the weekly PIP meetings.

VII. PLAINTIFF'S COMPLAINTS

A. Stevenson, April 2025

60. On Friday, April 11, 2025, Plaintiff spoke with Stevenson about the PIP.

61. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her, harassed her, demeaned her, ignored her, and treated her with disdain. Plaintiff told Stevenson that Martin did so because Plaintiff was the oldest person on Martin's team and because she is a woman.

62. On Monday, April 14, 2025, Plaintiff sent Stevenson an email with Plaintiff's written response to the PIP attached.

63. In the April 14, 2025 email, Plaintiff wrote: "I request the Performance Improvement Plan be suspended immediately pending review of my response, along with investigation into the erroneous information provided."

64. In the April 14, 2025 email, Plaintiff asked that the investigation include interviews with the Spacelabs team members she worked with. Plaintiff asked that Martin receive disciplinary action.

65. On April 15, 2025, Stevenson replied by email. Stevenson wrote: "the Performance Improvement Plan will remain in effect." Stevenson wrote: "Managers are responsible to provide their team members with feedback and performance coaching up to and including PIPs." Stevenson wrote: "Both Adam and I are here to provide support for you while you work through the PIP."

66. Stevenson's April 15, 2025 email did not state that Spacelabs would investigate Plaintiff's complaint.

67. Spacelabs did not investigate Plaintiff's April 2025 complaint. Spacelabs took no corrective action.

B. Iserman, May 16, 2025

68. On Friday, May 16, 2025, Plaintiff sent Iserman an email requesting a meeting about the PIP and Martin's conduct. Plaintiff attached her written response to the PIP.

69. In the May 16, 2025 email, Plaintiff described Martin "rolling his eyes when I speak, deep sighing, lack of communication/support etc." Plaintiff wrote that she had "never, ever had my performance called into question throughout my entire career, until Adam."

70. Iserman did not respond to the May 16, 2025 email.

C. Grindstaff, June 2025

71. On Sunday, June 1, 2025, Plaintiff sent Grindstaff an email with the

subject line "Employee Meeting Request." Plaintiff marked the email high importance. Plaintiff attached her written response to the PIP.

72. The June 1, 2025 email included, below Plaintiff's message, Plaintiff's April 14, 2025 email to Stevenson, Stevenson's April 15, 2025 reply, and Plaintiff's May 16, 2025 email to Iserman.

73. In the June 1, 2025 email, Plaintiff wrote: "I am an almost 60 year old, mature female, a veteran with a successful 40+ year work history, who for the first time, is having my performance questioned, inappropriately, in an attempt to remove me from the organization, by a Manager who has displayed strong bias, discriminatory and hostile behavior/actions (as witnessed by others) towards me, which is extremely concerning."

74. In the June 1, 2025 email, Plaintiff wrote that Martin's conduct included "inappropriate, disrespectful, discriminating, and hostile behavior."

75. In the June 1, 2025 email, Plaintiff wrote that Stevenson had responded "indicating that the PIP would remain, thus refusing to investigate my concerns," and that Plaintiff was left "without appropriate HR representation/advocacy."

76. In the June 1, 2025 email, Plaintiff identified her age and her sex. Plaintiff described Martin's treatment of her as discriminatory and hostile. Plaintiff asked Grindstaff for a meeting and for review.

77. Grindstaff responded to the June 1, 2025 email. Grindstaff wrote, "I'll look into it."

78. On or about June 7, 2025, Plaintiff contacted Grindstaff again. Plaintiff relayed Martin's statement that because he is a white male he could drive business,

while it would be difficult for a black male to do so.

79. Grindstaff responded by email, "I will be in touch with you shortly."

80. Neither Spacelabs nor OSI investigated Plaintiff's June 2025 complaints. Neither Spacelabs nor OSI took corrective action.

D. Constantine, June 2025

81. On or about June 17, 2025, Plaintiff and many other Spacelabs employees met with Constantine.

82. At that meeting, Plaintiff complained to Constantine about Martin's continued discrimination against her and harassment of her.

83. After that meeting, Plaintiff requested follow-up meetings with Constantine. Constantine put off those requests. No follow-up meeting took place before July 1, 2025.

VIII. KNOWLEDGE AND TIMING

84. Before July 1, 2025, Spacelabs knew of Plaintiff's complaints through Stevenson, Iserman, and Constantine.

85. Before July 1, 2025, OSI knew of Plaintiff's complaints through Grindstaff.

86. Stevenson received Plaintiff's April 14, 2025 request that the PIP be suspended and investigated and that Martin be disciplined. Stevenson attended the PIP presentation with Martin. Stevenson wrote that she and Martin were "here to provide support for you while you work through the PIP." Iserman, Martin's direct manager, received Plaintiff's May 16, 2025 email and the attached PIP response. Grindstaff undertook to look into Plaintiff's June 1, 2025 complaint. Constantine, Spacelabs' President, received Plaintiff's complaint on or about June 17, 2025.

87. On information and belief, Martin knew of Plaintiff's complaints of discrimination before July 1, 2025.

88. July 1, 2025 was 30 days after Plaintiff's June 1, 2025 email to Grindstaff. July 1, 2025 was about two weeks after Plaintiff's complaint to Constantine.

IX. TERMINATION

89. On July 1, 2025, Martin terminated Plaintiff's employment.

90. Martin terminated Plaintiff's employment as Plaintiff's manager at Spacelabs.

X. HARM

91. The termination ended the compensation and employment benefits Plaintiff received from Spacelabs.

92. Plaintiff suffered emotional distress as a result of Martin's treatment of her and the termination.

XI. ADMINISTRATIVE PREREQUISITES

93. Plaintiff filed a charge of discrimination against Spacelabs and OSI with the Equal Employment Opportunity Commission ("EEOC"). The charge was dual-filed with the Florida Commission on Human Relations ("FCHR").

94. On July 27, 2026, the EEOC issued a Determination and Notice of Rights as to Spacelabs.

95. On July 27, 2026, the EEOC issued a Determination and Notice of Rights as to OSI.

96. Plaintiff filed the original complaint in this action on August 27, 2026, within 90 days after receiving the notices.

97. All conditions precedent to this action have occurred, have been performed, or have been waived.

XII. SCOPE

98. The termination is the employment action challenged in every count. The PIP, Martin's conduct, and the handling of Plaintiff's complaints are pleaded as the sequence that preceded the termination and as facts bearing on motive, notice, and knowledge.

99. This pleading asserts no separate hostile-work-environment count.

CLAIMS FOR RELIEF

COUNT I
Discrimination Because of Sex, Fla. Stat. § 760.10(1)(a), Against Spacelabs

100. Plaintiff incorporates Sections I, II, III.A, IV, V.A, V.B, VI, IX, X, XI, and XII.

101. Spacelabs employed Plaintiff. Spacelabs is an "employer" under Fla. Stat. § 760.02(7).

102. Plaintiff is female. Martin is male.

103. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's male co-workers spoke.

104. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

105. On July 1, 2025, Martin, acting as Plaintiff's manager at Spacelabs,

terminated Plaintiff's employment.

106. Spacelabs terminated Plaintiff's employment because of her sex. Plaintiff's sex was a motivating factor in the termination.

107. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT II
Discrimination Because of Age, Fla. Stat. § 760.10(1)(a), Against Spacelabs

108. Plaintiff incorporates Sections I, II, III.A, IV, V.A, V.C, VI, IX, X, XI, and XII.

109. Spacelabs employed Plaintiff. Spacelabs is an "employer" under Fla. Stat. § 760.02(7).

110. Plaintiff was 59 years old on July 1, 2025. Plaintiff was the oldest person on Martin's team. Martin is substantially younger than Plaintiff.

111. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's younger co-workers spoke.

112. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

113. On July 1, 2025, Martin, acting as Plaintiff's manager at Spacelabs, terminated Plaintiff's employment.

114. Upon information and belief, Spacelabs filled Plaintiff's position with a substantially younger employee.

115. Spacelabs terminated Plaintiff's employment because of her age.

116. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT III
Retaliation, Fla. Stat. § 760.10(7), Against Spacelabs

117. Plaintiff incorporates Sections I, II, III.A, VI, VII, VIII, IX, X, XI, and XII.

118. Spacelabs employed Plaintiff. Spacelabs is an "employer" under Fla. Stat. § 760.02(7).

119. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because Plaintiff was the oldest person on Martin's team and because she is a woman. On June 1, 2025, Plaintiff told Grindstaff in writing that she was "an almost 60 year old, mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

120. Each of those complaints opposed a practice Plaintiff believed to be discrimination because of sex or because of age.

121. Before July 1, 2025, Spacelabs knew of those complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

122. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two weeks after the complaint to Constantine.

123. Spacelabs terminated Plaintiff's employment because Plaintiff complained

of discrimination.

124. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT IV
Discrimination Because of Sex, 42 U.S.C. § 2000e-2(a)(1), Against Spacelabs

125. Plaintiff incorporates Sections I, II, III.A, IV, V.A, V.B, VI, VII.A, IX, X, XI, and XII.

126. Spacelabs employed Plaintiff. Spacelabs is an "employer" under 42 U.S.C. § 2000e(b).

127. Plaintiff is female. Martin is male.

128. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's male co-workers spoke.

129. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

130. On July 1, 2025, Martin, acting as Plaintiff's manager at Spacelabs, terminated Plaintiff's employment.

131. Spacelabs terminated Plaintiff's employment because of her sex. Plaintiff's sex was a motivating factor in the termination.

132. In April 2025, Plaintiff told Stevenson, Spacelabs' human resources manager, that Martin had discriminated against her because she is a woman. Spacelabs

did not investigate. Spacelabs kept the PIP in effect. Martin then terminated Plaintiff's employment. Spacelabs acted with malice or with reckless indifference to Plaintiff's federally protected right to be free from discrimination because of sex.

133. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT V
Retaliation, 42 U.S.C. § 2000e-3(a), Against Spacelabs

134. Plaintiff incorporates Sections I, II, III.A, VI, VII, VIII, IX, X, XI, and XII.

135. Spacelabs employed Plaintiff. Spacelabs is an "employer" under 42 U.S.C. § 2000e(b).

136. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because she is a woman. On June 1, 2025, Plaintiff told Grindstaff in writing that she was a "mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

137. Each of those complaints opposed a practice Plaintiff believed to be unlawful under Title VII.

138. Before July 1, 2025, Spacelabs knew of those complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

139. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two

weeks after the complaint to Constantine.

140. Spacelabs would not have terminated Plaintiff's employment on July 1, 2025 had Plaintiff not complained of discrimination.

141. Spacelabs received Plaintiff's complaints through its human resources manager and its President, did not investigate them, and then terminated Plaintiff's employment. Spacelabs acted with malice or with reckless indifference to Plaintiff's federally protected right to oppose discrimination.

142. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT VI
Discrimination Because of Age, 29 U.S.C. § 623(a)(1), Against Spacelabs

143. Plaintiff incorporates Sections I, II, III.A, IV, V.A, V.C, VI, VII.A, VII.C, IX, X, XI, and XII.

144. Spacelabs employed Plaintiff. Spacelabs is an "employer" under 29 U.S.C. § 630(b).

145. Plaintiff was 59 years old on July 1, 2025. Plaintiff was within the class protected by 29 U.S.C. § 631(a). Plaintiff was the oldest person on Martin's team. Martin is substantially younger than Plaintiff.

146. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's younger co-workers spoke.

147. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's

performance before Martin became her manager.

148. On July 1, 2025, Martin, acting as Plaintiff's manager at Spacelabs, terminated Plaintiff's employment.

149. Upon information and belief, Spacelabs filled Plaintiff's position with a substantially younger employee.

150. Spacelabs would not have terminated Plaintiff's employment but for her age.

151. Before July 1, 2025, Plaintiff had told Stevenson that Martin discriminated against her because she was the oldest person on Martin's team. Plaintiff had told Grindstaff in writing that she was "an almost 60 year old, mature female" subjected to "discriminatory and hostile behavior/actions." Spacelabs did not investigate. Spacelabs knew that the ADEA prohibited terminating Plaintiff because of her age, or showed reckless disregard for whether the termination violated the ADEA.

152. Plaintiff lost compensation and employment benefits as a result.

COUNT VII
Retaliation, 29 U.S.C. § 623(d), Against Spacelabs

153. Plaintiff incorporates Sections I, II, III.A, VI, VII, VIII, IX, X, XI, and XII.

154. Spacelabs employed Plaintiff. Spacelabs is an "employer" under 29 U.S.C. § 630(b).

155. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because she was the oldest person on Martin's team. On June 1, 2025, Plaintiff told Grindstaff in writing that she was "an almost 60 year old, mature female" whose manager "has displayed strong bias, discriminatory and hostile

behavior/actions" toward her. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

156. Each of those complaints opposed a practice Plaintiff believed to be unlawful under the ADEA.

157. Before July 1, 2025, Spacelabs knew of those complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

158. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two weeks after the complaint to Constantine.

159. Spacelabs would not have terminated Plaintiff's employment on July 1, 2025 had Plaintiff not complained of age discrimination.

160. Spacelabs received Plaintiff's complaints of age discrimination through its human resources manager, did not investigate them, and then terminated Plaintiff's employment. Spacelabs knew that the ADEA prohibited terminating Plaintiff because she complained of age discrimination, or showed reckless disregard for whether the termination violated the ADEA.

161. Plaintiff lost compensation and employment benefits as a result.

COUNT VIII
Discrimination Because of Sex, Fla. Stat. § 760.10(1)(a), Against OSI

162. Plaintiff incorporates Sections I, II, III, IV, V.A, V.B, VI, IX, X, XI, and XII.

163. OSI is an "employer" under Fla. Stat. § 760.02(7). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as

alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

164. Plaintiff is female. Martin is male.

165. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's male co-workers spoke.

166. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

167. On July 1, 2025, Martin terminated Plaintiff's employment.

168. Plaintiff's employment was terminated because of her sex. Plaintiff's sex was a motivating factor in the termination.

169. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT IX
Discrimination Because of Age, Fla. Stat. § 760.10(1)(a), Against OSI

170. Plaintiff incorporates Sections I, II, III, IV, V.A, V.C, VI, IX, X, XI, and XII.

171. OSI is an "employer" under Fla. Stat. § 760.02(7). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

172. Plaintiff was 59 years old on July 1, 2025. Plaintiff was the oldest person on Martin's team. Martin is substantially younger than Plaintiff.

173. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's younger co-workers spoke.

174. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

175. On July 1, 2025, Martin terminated Plaintiff's employment.

176. Upon information and belief, Spacelabs filled Plaintiff's position with a substantially younger employee.

177. Plaintiff's employment was terminated because of her age.

178. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT X
Retaliation, Fla. Stat. § 760.10(7), Against OSI

179. Plaintiff incorporates Sections I, II, III, VI, VII, VIII, IX, X, XI, and XII.

180. OSI is an "employer" under Fla. Stat. § 760.02(7). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

181. On June 1, 2025, Plaintiff told Grindstaff, OSI's Chief Human Resource Officer, in writing that she was "an almost 60 year old, mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because

Plaintiff was the oldest person on Martin's team and because she is a woman. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

182. Each of those complaints opposed a practice Plaintiff believed to be discrimination because of sex or because of age.

183. Before July 1, 2025, OSI knew of the June 1, 2025 complaint through Grindstaff. Before July 1, 2025, Spacelabs knew of the April and June 17, 2025 complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

184. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two weeks after the complaint to Constantine.

185. Plaintiff's employment was terminated because Plaintiff complained of discrimination.

186. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT XI
Discrimination Because of Sex, 42 U.S.C. § 2000e-2(a)(1), Against OSI

187. Plaintiff incorporates Sections I, II, III, IV, V.A, V.B, VI, VII.A, VII.C, IX, X, XI, and XII.

188. OSI is an "employer" under 42 U.S.C. § 2000e(b). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment

was an act of OSI.

189. Plaintiff is female. Martin is male.

190. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's male co-workers spoke.

191. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

192. On July 1, 2025, Martin terminated Plaintiff's employment.

193. Plaintiff's employment was terminated because of her sex. Plaintiff's sex was a motivating factor in the termination.

194. On June 1, 2025, Grindstaff, OSI's Chief Human Resource Officer, received Plaintiff's written complaint that she was a "mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. Grindstaff undertook to look into it. Neither OSI nor Spacelabs investigated. The PIP remained in effect. Martin then terminated Plaintiff's employment. OSI acted with malice or with reckless indifference to Plaintiff's federally protected right to be free from discrimination because of sex.

195. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT XII
Retaliation, 42 U.S.C. § 2000e-3(a), Against OSI

196. Plaintiff incorporates Sections I, II, III, VI, VII, VIII, IX, X, XI, and XII.

197. OSI is an "employer" under 42 U.S.C. § 2000e(b). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

198. On June 1, 2025, Plaintiff told Grindstaff, OSI's Chief Human Resource Officer, in writing that she was a "mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because she is a woman. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

199. Each of those complaints opposed a practice Plaintiff believed to be unlawful under Title VII.

200. Before July 1, 2025, OSI knew of the June 1, 2025 complaint through Grindstaff. Before July 1, 2025, Spacelabs knew of the April and June 17, 2025 complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

201. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two weeks after the complaint to Constantine.

202. Plaintiff's employment would not have been terminated on July 1, 2025 had Plaintiff not complained of discrimination.

203. Grindstaff received Plaintiff's June 1, 2025 complaint and undertook to look into it. Neither OSI nor Spacelabs investigated. Martin then terminated Plaintiff's

employment. OSI acted with malice or with reckless indifference to Plaintiff's federally protected right to oppose discrimination.

204. Plaintiff lost compensation and employment benefits and suffered emotional distress as a result.

COUNT XIII
Discrimination Because of Age, 29 U.S.C. § 623(a)(1), Against OSI

205. Plaintiff incorporates Sections I, II, III, IV, V.A, V.C, VI, VII.A, VII.C, IX, X, XI, and XII.

206. OSI is an "employer" under 29 U.S.C. § 630(b). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

207. Plaintiff was 59 years old on July 1, 2025. Plaintiff was within the class protected by 29 U.S.C. § 631(a). Plaintiff was the oldest person on Martin's team. Martin is substantially younger than Plaintiff.

208. When Plaintiff spoke in meetings, Martin rolled his eyes, sighed, and displayed disinterest and irritation. Martin did not do so when Plaintiff's younger co-workers spoke.

209. On April 4, 2025, Martin placed Plaintiff on the PIP. The PIP's statements about Plaintiff's performance were not accurate. No employer had questioned Plaintiff's performance before Martin became her manager.

210. On July 1, 2025, Martin terminated Plaintiff's employment.

211. Upon information and belief, Spacelabs filled Plaintiff's position with a

substantially younger employee.

212. Plaintiff's employment would not have been terminated but for her age.

213. On June 1, 2025, Grindstaff, OSI's Chief Human Resource Officer, received Plaintiff's written complaint that she was "an almost 60 year old, mature female" subjected to "discriminatory and hostile behavior/actions." Grindstaff undertook to look into it. Neither OSI nor Spacelabs investigated. OSI knew that the ADEA prohibited terminating Plaintiff because of her age, or showed reckless disregard for whether the termination violated the ADEA.

214. Plaintiff lost compensation and employment benefits as a result.

COUNT XIV
Retaliation, 29 U.S.C. § 623(d), Against OSI

215. Plaintiff incorporates Sections I, II, III, VI, VII, VIII, IX, X, XI, and XII.

216. OSI is an "employer" under 29 U.S.C. § 630(b). With respect to Plaintiff's employment, Spacelabs and OSI operated as a single, integrated employer, as alleged in Section III.B. On that basis, Martin's termination of Plaintiff's employment was an act of OSI.

217. On June 1, 2025, Plaintiff told Grindstaff, OSI's Chief Human Resource Officer, in writing that she was "an almost 60 year old, mature female" whose manager "has displayed strong bias, discriminatory and hostile behavior/actions" toward her. In April 2025, Plaintiff told Stevenson that Martin had discriminated against her because she was the oldest person on Martin's team. On or about June 17, 2025, Plaintiff complained to Constantine about Martin's continued discrimination against her.

218. Each of those complaints opposed a practice Plaintiff believed to be

unlawful under the ADEA.

219. Before July 1, 2025, OSI knew of the June 1, 2025 complaint through Grindstaff. Before July 1, 2025, Spacelabs knew of the April and June 17, 2025 complaints through Stevenson and Constantine. On information and belief, Martin knew of those complaints before July 1, 2025, as alleged in Section VIII.

220. On July 1, 2025, Martin terminated Plaintiff's employment. The termination came 30 days after the June 1, 2025 complaint to Grindstaff and about two weeks after the complaint to Constantine.

221. Plaintiff's employment would not have been terminated on July 1, 2025 had Plaintiff not complained of age discrimination.

222. Grindstaff received Plaintiff's June 1, 2025 complaint of age discrimination and undertook to look into it. Neither OSI nor Spacelabs investigated. Martin then terminated Plaintiff's employment. OSI knew that the ADEA prohibited terminating Plaintiff because she complained of age discrimination, or showed reckless disregard for whether the termination violated the ADEA.

223. Plaintiff lost compensation and employment benefits as a result.

PRAYER FOR RELIEF

Plaintiff requests that the Court enter judgment in her favor and against Spacelabs and OSI, and award:

(a) On Counts I through XIV, back pay, including lost wages, commissions, bonuses, and the value of lost employment benefits, with prejudgment interest where authorized;

(b) On Counts I through XIV, reinstatement, or front pay and front benefits in lieu

of reinstatement;

(c) On Counts I, II, III, IV, V, VIII, IX, X, XI, and XII, compensatory damages, including damages for emotional distress, as permitted by 42 U.S.C. § 1981a and Fla. Stat. § 760.11(5);

(d) On Counts IV, V, XI, and XII, punitive damages as permitted by 42 U.S.C. § 1981a(b)(1);

(e) On Counts I, II, III, VIII, IX, and X, punitive damages as permitted by Fla. Stat. § 760.11(5);

(f) On Counts VI, VII, XIII, and XIV, for willful violations, liquidated damages in an additional amount equal to the back pay and lost benefits awarded, as permitted by 29 U.S.C. § 626(b);

(g) Reasonable attorney's fees and costs as permitted by 42 U.S.C. § 2000e-5(k) (including expert fees), 29 U.S.C. § 626(b), and Fla. Stat. § 760.11(5);

(h) Post-judgment interest as provided by law; and

(i) Such other relief as the Court finds just.

Plaintiff does not seek a double recovery for the same loss under more than one statute.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

Dated: October ___, 2026.

Signature block omitted.