

DEC 02 2011

John A. Clark, Clerk/Clerk  
By GLORIETTA ROBINSON, Deputy

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8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10 **DAVID COPPEDGE**, an individual;

11 Plaintiff,

12 vs.

13 **JET PROPULSION LABORATORY**, form  
14 unknown; **CALIFORNIA INSTITUTE OF**  
15 **TECHNOLOGY**, form unknown; **GREGO-**  
16 **RY CHIN**, an Individual; **CLARK A.**  
17 **BURGESS**, an Individual; **KEVIN KLENK**,  
an Individual; and **Does 1 through 25**, inclu-  
sive,

18 Defendants.

Case No. BC435600

*The Honorable Ernest M. Hiroshige, Dept. 54*

**PLAINTIFF DAVID COPPEDGE'S  
PROPOSED SHORT STATEMENT OF  
THE CASE TO BE READ TO THE JURY**

FSC: December 2, 2011  
HEARING TIME: 8:30 a.m.  
DEPT: 54

Trial Date: December 14, 2011

19 TO THIS HONORABLE COURT AND TO DEFENDANT AND ITS COUNSEL HEREIN:

20 Pursuant to the Court's Trial Preparation Order, Plaintiff David COPPEDGE hereby presents his  
21 Statement of the Case that he proposes be read to the jury:  
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23 **STATEMENT OF THE CASE**

24 Plaintiff David Coppedge was employed by the Defendant, the Jet Propulsion Laborato-  
25 ry, a department of Defendant California Institute of Technology. Mr. Coppedge contends that:  
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- (1) Defendant JPL discriminated against him and wrongfully demoted him on the basis of his religious views and views concerning intelligent design that were perceived as religious in nature;
- (2) Defendant JPL failed to prevent its employees from discriminating against him; and
- (3) Defendant JPL retaliated against him and wrongfully terminated him:
  - a. Because he objected to Defendant's disciplining him and demoting him, and
  - b. Because Plaintiff filed this lawsuit after being disciplined and demoted.

Defendant JPL contends that:

- (1) It did not discriminate against Mr. Coppedge because of religion or the perception of religion;
- (2) Mr. Coppedge was not demoted;
- (3) It did not fail to prevent its employees from discriminating against him;
- (4) It did not retaliate against Mr. Coppedge; and
- (5) Mr. Coppedge's employment was terminated due to a reduction in force.

DATED: December 1, 2011

**THE BECKER LAW FIRM**

William J  
Becker Jr, Esq

Digitally signed by William J Becker Jr, Esq  
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By:

WILLIAM J. BECKER, JR., ESQ.  
Attorneys for Plaintiff, DAVID COPPEDGE