

Statement of Facts

Case Title: John D. Smith v. Acme Corporation

Court: United States District Court for the District of Columbia

Case No.: 20-CV-01234

I. Introduction

This Statement of Facts is submitted in support of Plaintiff John D. Smith's Motion for Summary Judgment, and sets forth material facts that are not in genuine dispute, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

II. Background

1. John D. Smith ("Smith") is a resident of Washington, D.C. and was employed by Acme Corporation as a Senior Analyst from January 15, 2017, until his termination on September 4, 2023.
2. Acme Corporation ("Acme") is a Delaware corporation with its principal place of business in Washington, D.C.
3. On March 10, 2023, Smith made a written complaint to Acme's Human Resources department alleging workplace discrimination based on age.

III. Events Leading to Litigation

4. Following the complaint, Smith's supervisor reassigned Smith's major client accounts to other employees without stated justification.
5. On August 14, 2023, Acme issued a formal written warning to Smith citing "performance deficiencies," without prior documentation of such issues in Smith's employment records.
6. Smith was terminated on September 4, 2023, with Acme citing "organizational restructuring" as the reason for dismissal.
7. No other employees in Smith's department were terminated as part of this alleged restructuring.
8. Smith is over the age of 50 and had consistently received favorable performance reviews prior to filing his complaint.

IV. Subsequent Proceedings

9. Smith filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC") on October 2, 2023.
10. The EEOC issued a Notice of Right to Sue on December 15, 2023.
11. Smith timely filed the present action in this Court on January 10, 2024.

V. Important Notes

- Statements of Facts should be concise, objective, and based strictly on record evidence.
- Each fact should be clearly numbered or otherwise organized for easy reference.
- Do not include arguments, opinions, or legal conclusions in the Statement of Facts.
- Proper citation to supporting evidence is recommended in practice, even if not shown here.
- This document provides a factual foundation on which the legal arguments are built in subsequent sections of

a brief.