

**FURTHER INSTRUCTIONS - PLAINTIFF:**



Anglia Ruskin  
University

Cambridge & Chelmsford

**Just for the Record: Learning Lawyers'  
Negotiation Skills Through Video Recording**

**Presenter:**

**Dr Andy Noble,**

**Senior Lecturer in Employment Law,**

**Lord Ashcroft International Business School,**

**Anglia Ruskin University, Cambridge, UK**

**Case Study Documents**

Prior to the scheduled date of the settlement meeting, the Plaintiff, Brandi Samuels, has provided you with some further information to assist with the negotiations. Ms Samuels says that she has not been able to find alternative work since her employment was terminated by The Hump Corporation on 15th December 2017, apart from two short assignments, one on February and one in April, as typist at two different companies. These assignments were organised through an agency with whom Ms Samuels is registered. Each assignment lasted for one week and she was paid \$500 for each assignment.

Ms Samuels also tells you that, since she was dismissed from her employment, she has been making enquiries with some other former employees of The Hump Corporation and she has found four other women who are prepared to come forward and given evidence of sexual misconduct or sexually inappropriate behavior or language on the part of Mr Hump. Ms Samuels claims that one of these women has a recorded conversation in which Mr Hump is said to be heard to say that 'women are only good for one thing, and we all know what that is!', although the recording has not yet been produced and its context is unknown.

Ms Samuels is interested in negotiating a settlement of this action as soon as possible, and to put it all behind her and move on with her life. She does not feel, however, that she should sell herself short. She feels that at the very least she should be compensated for her past and future loss of earnings, and for intentional inflation of emotional distress caused to her by Mr Hump's actions. Her absolute minimum terms for settlement would be \$75,000 dollars and an agreed reference confirming that she left her employment voluntarily.

### **YOUR INSTRUCTIONS**

To use the additional information, together with the earlier supplied instructions, in any way you see fit to help in the settlement negotiations.