



State of Arkansas
Bureau of
Legislative Research

Marty Garrity, Director
 Kevin Anderson, Assistant Director
 for Fiscal Services
 Eric Sanders, Assistant Director
 for Information Technology
 Matthew Miller, Assistant Director
 for Legal Services
 Jessica Whittaker, Assistant Director
 for Research Services

State Agency Litigation Notification Form

Dear Agency Director:

Arkansas Code § 10-3-312 requires that any agency or institution that is not represented by the Attorney General shall notify the Director of the Bureau of Legislative Research of pending litigation so that the appropriate legislative committee may “determine the action that may be deemed necessary to protect the interests of the General Assembly and the State of Arkansas in that matter.”

In order to submit a report regarding pending litigation pursuant to Arkansas Code § 10-3-312, please complete the following form for each pending lawsuit, along with a cover letter to the Director of the Bureau of Legislative Research, and submit to desikans@blr.arkansas.gov.

DATE REPORTING:			
Agency:	University of Arkansas System (UA Pine Bluff campus)	Phone:	(501) 686-2518
E-mail:	aschubert@uasys.edu	Contact:	Amber Schubert
1. STYLE OF THE CASE BEING LITIGATED			
Dr. Tamara Pace-Glover vs. Board of Trustees of the University of Arkansas, et al.			
2. IDENTITY OF THE TRIBUNAL BEFORE WHICH THE MATTER HAS BEEN FILED (COURT)			
U.S. District Court for the Eastern District of Arkansas			
3. BRIEF DESCRIPTION OF THE ISSUES INVOLVED			
Dr. Pace-Glover is a current employee of the University of Arkansas at Pine Bluff who alleges that she was subjected to a hostile work environment and demoted from her administrative appointment as department chair based on discrimination and retaliation for her use of the FMLA and ADA. The University denies the allegations.			
3A. OTHER DESCRIPTION INFORMATION			
Docket Number	4:26-cv-00141-LPR		
Date Filed	February 9, 2026		
Defendant	Board of Trustees of the University of Arkansas, Dr. Bruce McGowan, Dr. Andrea Stewart		
Defendant Attorney	Amber Schubert		
Plaintiff	Dr. Tamara Pace-Glover		
Plaintiff Attorney	Luther Sutter, Lucien Gillham		
4. ANY OTHER RELEVANT INFORMATION			
4A. OTHER RELEVANT INFORMATION			
Case History	Defendants filed an answer to the complaint		
Relief Sought	Unspecified monetary damages and reinstatement to the chair position		
Current Status	Joint discussion on scheduling order before July 20, 2026		

A.C.A. § 10-3-312

Current through all laws of the 2017 Regular Session and 2017 First Extraordinary Session, including changes and corrections by the Arkansas Code Revision Commission.

- Arkansas Code Annotated
- Title 10 General Assembly
- Chapter 3 Committees
- Subchapter 3-- Legislative Council

10-3-312. NOTIFICATION OF LAWSUITS AFFECTING STATE.

- (a) In order that the General Assembly may take whatever steps it deems necessary concerning lawsuits which may affect the State of Arkansas, its officials, or its financial resources:
 - (1) The Attorney General shall notify the Director of the Bureau of Legislative Research who is the Executive Secretary to the Legislative Council as soon as possible after the Attorney General becomes involved in such litigation;
 - (2) **When any state agency or any entity which receives an appropriation of funds from the General Assembly becomes involved in litigation without representation by the Attorney General, the director or administrative head of the agency shall notify the Director of the Bureau of Legislative Research as soon as possible.**
- (b) The notice given by the Attorney General or by the director or administrative head of a state agency to the Director of the Bureau of Legislative Research shall include the style of the case being litigated, the identity of the tribunal before which the matter has been filed, a brief description of the issues involved, and other information that will enable the Legislative Council or the Joint Budget Committee to determine the action that may be deemed necessary to protect the interests of the General Assembly and the State of Arkansas in that matter.
- (c) Upon receipt of the notice, the Director of the Bureau of Legislative Research shall during the interim between legislative sessions transmit a copy of the notice to the cochair of the Legislative Council and to the cochair of the Joint Budget Committee during legislative sessions in order that those committees may schedule that matter upon their respective agendas at the earliest possible date.
- (d) During the interim between legislative sessions, the Legislative Council shall determine, and during legislative sessions the Joint Budget Committee shall determine, whether the General Assembly has an interest in the litigation and, if so, take whatever action deemed necessary to protect the General Assembly's and the state's interest in that matter.

HISTORY

Acts 1987, No. 798, §§ 1, 2.

Arkansas Code of 1987 Annotated Official Edition
© 2018 by the State of Arkansas All rights reserved.

A.C.A. § 10-3-312 (Lexis Advance through all laws of the 2017 Regular Session and 2017 First Extraordinary Session, including changes and corrections by the Arkansas Code Revision Commission)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS**

DR. TAMARA PACE-GLOVER,

Plaintiff,

v.

Case No. 4:26-cv-00141-LPR

**BOARD OF TRUSTEES OF THE UNIVERSITY OF ARKANSAS
ANDREA STEWART, in her individual
capacity; and BRUCE McGOWAN, in his
individual capacity,**

Defendants.

SECOND AMENDED COMPLAINT

COMES NOW, Plaintiff **DR. TAMARA PACE-GLOVER, LCSW**, by and through her undersigned counsel, Luther O'Neal Sutter with **SUTTER & GILLHAM, P.L.L.C.**, and for her Complaint against Defendants states as follows:

I. INTRODUCTION

1. This action arises from Defendants' systematic discrimination, retaliation, failure to accommodate, and interference with Plaintiff's federally protected rights under the Pregnancy Discrimination Act ("PDA"), Pregnant Workers Fairness Act ("PWFA"), Arkansas Civil Rights Act ("ACRA"), Section 504 of the Rehabilitation Act, Titles I and II of the Americans with Disabilities Act ("ADA"), the Family and Medical Leave Act ("FMLA"), and the First Amendment to the United States Constitution and the ACRA. This action further arises from Defendants' compelled, uncompensated use of Plaintiff's services as Field Coordinator for the Department of Social Work beginning in January 2025, and Defendants' subsequent attempt to obtain a retroactive release of those wage obligations through a backdated appointment document conditioned upon a one-time payment, which Plaintiff refused.

2. Plaintiff, a highly qualified and experienced Associate Professor and former Chairperson of the Social Work Department at the University of Arkansas at Pine Bluff ("UAPB"), was subjected to a pattern of adverse employment actions “including demotion, denial of promotion, interference with approved accommodations, and a hostile work environment direct retaliation for exercising her protected rights related to pregnancy, disability, medical leave, and petitioning the government for redress of grievances.

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Â§ 1331 (federal question jurisdiction) and 28 U.S.C. Â§ 1343 (civil rights jurisdiction).

4. This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. Â§ 1367.

5. Plaintiff timely filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"), which issued a Right to Sue letter. This action is filed within 90 days of Plaintiff's receipt of that letter.

6. Venue is proper in this District pursuant to 28 U.S.C. Â§ 1391(b), as the events giving rise to Plaintiff's claims occurred within the Eastern District of Arkansas.

III. PARTIES

7. Plaintiff, **DR. TAMARA PACE-GLOVER** is an adult female resident of Jefferson County, Arkansas. At all times relevant to this Complaint, Plaintiff was employed by the Board of Trustees of the University of Arkansas as an Associate Professor and Chairperson of the Social Work Department at its UAPB campus. She has performed her job satisfactorily, but she has not been paid appropriately. She had been performing the duties of field coordinator since January of 2025, but the System did not pay her appropriately. See Exhibit “A.”

8. Defendant **Board of Trustees of the University of Arkansas ("THE SYSTEM")** is a public institution of higher education organized under Arkansas law, operating multiple campuses including UAPB. The System receives federal funding and is subject to federal civil rights laws including Title VII of the Civil Rights Act of 1964, the ADA, Section 504 of the Rehabilitation Act, the PWFA, and the FMLA. The System employs more than fifty employees within a seventy-five-mile radius and is an "employer" within the meaning of the FMLA.

9. Defendant **ANDREA STEWART** is and was at all relevant times the Chancellor and/or Provost of UAPB. She is sued in her individual capacity for violations of the FMLA and for violations of Plaintiff's clearly established First Amendment rights under 42 U.S.C. Â§ 1983. At all relevant times, Defendant Stewart was acting under color of state law and within the scope of her employment.

10. Defendant **BRUCE MCGOWAN** is and was at all relevant times the Provost of UAPB. He is sued in his individual capacity for violations of the FMLA and for violations of Plaintiff's clearly established First Amendment rights under 42 U.S.C. Â§ 1983. At all relevant times, Defendant McGowan was acting under color of state law and within the scope of his employment.

IV. FACTUAL ALLEGATIONS

A. Employment History and Exemplary Performance

11. Plaintiff was hired by UAPB in 2021 as Chairperson of the Social Work Department, a twelve-month administrative appointment with a salary commensurate with her leadership responsibilities.

12. Plaintiff is a Licensed Clinical Social Worker ("LCSW") with extensive professional and academic credentials. She brought to UAPB significant experience in social work practice, program development, and academic administration.

13. At all relevant times, Plaintiff was qualified for her position as Chairperson and performed her duties satisfactorily. Her performance evaluations were consistently positive, and she received no written warnings, performance improvement plans, or disciplinary actions prior to the adverse employment actions described herein.

14. Plaintiff's duties as Chairperson included departmental oversight, faculty supervision, curriculum development, student advising coordination, budget management, and program accreditation responsibilities. Plaintiff is not currently performing faculty oversight or supervision; Ms. Felicia Cooper serves as Interim Chair, and Plaintiff and Ms. Cooper are the only two members of the Department. Plaintiff is, however, currently carrying a teaching overload and performing the duties of Field Coordinator—an administrative role—without additional compensation for either.

B. Pregnancy, Accommodation Request, and Initial Interference

15. In early April 2023, Plaintiff became pregnant. Due to medical limitations associated with her pregnancy, Plaintiff submitted a request for temporary telecommuting accommodation.

16. On April 7, 2023, Plaintiff's accommodation request was formally approved by her immediate supervisor, Dean Grant Wangila, and by Ms. Tonisha Davis, Director of Affirmative Action and Title IX at UAPB.

17. After this accommodation was approved, Defendant Stewart intervened and, along with Ms. Davis, attempted to reverse the approved accommodation. Defendant Stewart stated that Plaintiff needed to "go ahead and take FMLA leave instead," even though Plaintiff's accommodation had already been approved and Plaintiff had not requested FMLA leave at that time.

18. This interference discouraged Plaintiff's use of her approved pregnancy accommodation and treated her pregnancy-related medical limitations as a liability rather than a protected condition under federal and state law.

C. FMLA Leave and Harassment During Protected Leave

19. After the birth of her son in May 2023, Plaintiff began approved FMLA leave.

20. In or around September 2023, while Plaintiff was on FMLA leave, Defendant Stewart initiated or attempted to initiate an investigation alleging that Plaintiff was working another job during her FMLA leave. This allegation was false and unsupported by any evidence. Defendant Stewart repeatedly went to the Human Resources Department in an effort to have this investigation opened.

21. During Plaintiff's FMLA leave, Defendant Stewart repeatedly contacted the Human Resources Department asking how much leave time Plaintiff had remaining, when Plaintiff was returning to work, and why no one had forced Plaintiff to return to work. On October 25, 2023, HR Director Christopher Hickman called Plaintiff directly and asked whether she was working another job, informing Plaintiff that Defendant Stewart was "at it again." Mr. Hickman indicated that he wanted to ask Plaintiff personally rather than proceed through formal channels. Plaintiff was not working another job at that time. Defendant Stewart's repeated efforts to instigate an investigation based on a baseless allegation, and the resulting direct inquiry from HR Director Hickman, caused Plaintiff significant emotional distress while she was on protected FMLA leave.

22. Defendant Stewart's repeated inquiries and attempts to monitor and curtail Plaintiff's FMLA leave interfered with Plaintiff's statutory rights under the FMLA and caused Plaintiff significant stress and anxiety during her protected medical leave.

23. Plaintiff transitioned from FMLA leave to approved short-term disability leave and subsequently to long-term disability leave, all of which were supported by documentation from her treating physicians.

24. At no time during Plaintiff's pregnancy, FMLA leave, or disability leave was Plaintiff informed that her job performance was deficient or that her administrative role was in jeopardy.

D. Attempts to Remove Plaintiff While on Protected Leave

25. In April 2024, while Plaintiff remained on approved disability leave, she received a letter from the UAPB Human Resources Department instructing her to return to work.

26. The letter contained conflicting return dates and had been drafted at the end of March 2024 but was not sent to Plaintiff until April 16, 2024, leaving Plaintiff insufficient time to respond or provide updated medical documentation.

27. Ms. Tonisha Davis intervened and advised Human Resources that Plaintiff needed additional time to submit updated medical documentation supporting her continued leave.

28. On April 16, 2024, before Plaintiff had returned to work and while she remained on approved disability leave. "Dean Wangila sent Plaintiff an email stating that although the School of Arts and Sciences would work with her, the Department of Social Work could not hold her Chairperson position and that the position needed to be filled.

29. Shortly after Dean Wangila's email, Defendant Stewart stated that Plaintiff still held the Chairperson position and that a determination would be made once Plaintiff's accommodation was finalized.

30. This inconsistent and contradictory messaging caused Plaintiff significant confusion and distress and suggested that Plaintiff's pregnancy-related disability leave was being used as a pretext to remove her from her leadership role.

E. Return to Work with Accommodations and Continued Targeting

31. On May 9, 2024, Plaintiff met with Ms. Davis and Dean Wangila to discuss her return to work. Defendant Stewart inserted herself into this meeting without prior notice to Plaintiff.

32. Plaintiff returned to work on May 20, 2024, with approved accommodation for her disability.

33. Shortly after Plaintiff's return to work, UAPB held an Academic Affairs retreat. Discussions at this retreat focused heavily on FMLA leave and pregnancy-related matters in a manner that singled out Plaintiff.

34. Human Resources Director Christopher Hickman later confirmed to Plaintiff that the retreat discussion largely centered around Plaintiff's situation, further evidence that Plaintiff was being targeted for having exercised her FMLA and accommodation rights.

35. When Plaintiff first encountered Defendant Stewart after returning from leave, Defendant Stewart asked Plaintiff whether she "still wanted to be an administrator."

36. Defendant Stewart's question was both discouraging and retaliatory, as there had been no prior indication that Plaintiff's performance or commitment to her administrative role had been questioned. This statement was made in the context of Plaintiff having just returned from pregnancy-related disability leave and was designed to intimidate Plaintiff and suggest that her position was in jeopardy due to her protected leave.

F. Office Safety Issue and False Accusations

37. In fall 2024, longstanding unhealthy conditions in the Department of Social Work office came to light, including rodent and pest infestation.

38. After staff raised concerns about the unsafe conditions, Plaintiff contacted the building manager, Dean Kimberly Davis, who inspected the space and confirmed the infestation.

39. Proper approvals were obtained from the building manager, and UAPB Facilities Management subsequently cleaned and treated the abandoned office area, which contained old food, debris, and evidence of rodent activity.

40. Following the cleaning and remediation of the unsafe office space, Defendant Stewart falsely accused Plaintiff of cutting locks, breaking into an abandoned office, and damaging university property.

41. These accusations were false and unsupported by any evidence. Plaintiff later learned through Human Resources that there was no financial value attached to the old furniture and items that had been removed from the abandoned office during the cleaning process.

42. Defendant Stewart's false and defamatory accusations were made in retaliation for Plaintiff's efforts to ensure a safe working environment for herself and her staff and were designed to fabricate a pretext for adverse employment action against Plaintiff.

G. Grievances and Immediate Retaliation

43. On November 25, 2024, Plaintiff filed a formal grievance with the UAPB Human Resources Department regarding Defendant Stewart's ongoing retaliatory and harassing conduct and the hostile work environment created by Defendant Stewart.

44. Human Resources confirmed receipt of Plaintiff's grievance on the morning of November 26, 2024, and advised Plaintiff that the matter fell under Title IX. Plaintiff promptly provided documentation to Ms. Tonisha Davis as requested.

45. That same day—November 26, 2024, at 5:14 p.m., fewer than twelve hours after HR confirmed receipt of her grievance that morning—Plaintiff received an email from Dean Wangila attaching a letter removing her as Chairperson of the Social Work Department and converting her

position from a twelve-month administrative appointment to a nine-month faculty appointment, effective January 1, 2025.

46. This demotion resulted in a \$19,500 annual pay reduction and represented significant adverse employment action.

47. The demotion was executed without any prior meeting, discussion, or warning and was communicated to Plaintiff on a day when she was on approved sick leave.

48. When Plaintiff contacted Dean Wangila to discuss the demotion, he stated that he did not want to take this action, that he did not agree with it, and that "his hands were tied" due to pressure from Defendant Stewart and Defendant McGowan.

49. The temporal proximity between Plaintiff's filing of a formal grievance on November 25, 2024, HR's confirmation of receipt on the morning of November 26, 2024, and Plaintiff's receipt of the demotion letter that same afternoon at 5:14 p.m. establishes a clear causal connection between Plaintiff's protected activity and the adverse employment action.

50. The timing and circumstances of the demotion demonstrate that it was retaliatory and directly connected to Plaintiff's grievances concerning pregnancy discrimination, FMLA interference, disability discrimination, and harassment.

H. Required to Perform Chairperson and Field Coordinator Duties Without Adequate or Any Compensation

51. Despite being demoted from Chairperson to a nine-month faculty position with a \$19,500 pay reduction, Plaintiff has been required to continue performing significant administrative and leadership duties previously associated with the Chairperson role, and—as set forth in detail below—has also been required since January 2025 to perform the duties of Field

Coordinator for the Department of Social Work without any additional compensation whatsoever for that role.

52. These duties include departmental oversight, program development responsibilities (including leading the development of a Master's degree program), coordination of field placements and internships, faculty supervision, and other administrative functions beyond the scope of a standard nine-month faculty appointment.

53. Requiring Plaintiff to perform substantially similar or additional administrative work for significantly reduced compensation constitutes a separate and ongoing adverse employment action and reflects retaliation for Plaintiff's exercise of protected rights.

54. In addition to the foregoing, and beginning in or around January 2025, Defendants required, directed, and permitted Plaintiff to perform the full duties and responsibilities of Field Coordinator for the Department of Social Work at UAPB, a position separate and distinct from her demoted nine-month Associate Professor appointment. The Field Coordinator role carries substantial administrative, supervisory, and programmatic responsibilities, including overseeing the planning, implementation, and evaluation of the field education program; developing and maintaining partnerships with community agencies that serve as student placement sites; supporting and training field instructors; and ensuring that students achieve the professional competencies required for social work licensure and practice.

55. Despite requiring Plaintiff to perform the full duties of Field Coordinator from January 2025 forward, Defendants provided Plaintiff with no additional compensation, stipend, or salary adjustment for this service. Plaintiff performed these Field Coordinator duties in addition to her regular professorial responsibilities, without any reduction in her teaching load or other assigned obligations.

56. Defendants were at all relevant times aware that Plaintiff was performing Field Coordinator duties without additional compensation. Supervisory personnel within the Department of Social Work and the School of Arts and Sciences, including individuals within Defendant Stewart's and Defendant McGowan's chains of authority, directed, supervised, and accepted the benefit of Plaintiff's Field Coordinator services throughout this period.

57. On or about January 4, 2026—approximately one year after Plaintiff had already begun performing Field Coordinator duties without compensation—Defendant UAPB issued a formal appointment letter purporting to appoint Plaintiff as Field Coordinator effective January 8, 2026. This letter was signed by Grant W. Wangila, Ph.D., Interim Dean of the School of Arts and Sciences, and was copied to Felicia Cooper (Interim Chairperson, Department of Social Work), Defendant McGowan (Interim Provost and Vice Chancellor for Academic Affairs), Dr. Anthony Graham (Chancellor), and Christopher Hickman (Director of Human Resources). The letter made no reference to, and was unaccompanied by any offer to compensate Plaintiff for, her Field Coordinator service during the preceding year.

58. Subsequently, Defendants presented Plaintiff with a backdated appointment document purporting to establish her Field Coordinator appointment as effective January 2025—approximately one year prior to the actual January 4, 2026 appointment letter—and conditioned a one-time monetary payment upon Plaintiff's execution of that backdated document.

59. Plaintiff refused to sign the backdated document and declined the accompanying one-time payment offer.

60. Defendants' presentation of a backdated appointment document and accompanying offer of a one-time payment constitutes an institutional admission that Plaintiff was in fact performing Field Coordinator duties from and after January 2025, and an implicit

acknowledgment that Defendants failed to compensate her for those duties throughout that entire period. This admission is wholly inconsistent with any contention that Plaintiff's Field Coordinator service was voluntary, incidental to her professorial duties, or otherwise not subject to additional compensation.

61. As of the date of this Complaint, Plaintiff continues to perform Field Coordinator duties without compensation for the period of service beginning January 2025. Requiring Plaintiff to perform an entirely separate administrative role—carrying its own distinct duties, supervisory obligations, and program management responsibilities—without any compensation, while simultaneously withholding from her the Chairperson position and its associated salary, constitutes a further separate and ongoing adverse employment action taken in retaliation for Plaintiff's exercise of protected rights.

I. Retaliatory Denial of Promotion Chairperson Reapplication

62. On July 2, 2025, the Chairperson position for the Social Work Department was posted as vacant, and Plaintiff reapplied for the position from which she had been unlawfully removed.

63. Plaintiff was informed that only one other person had applied for the Chairperson position.

64. Plaintiff was also informed that there were concerns her application could be blocked due to Defendant Stewart's influence, particularly after Defendant Stewart returned to the Provost role at UAPB.

65. Despite Plaintiff's prior experience, qualifications, successful performance as Chairperson from 2021 through 2024, and the fact that only one other applicant applied, Plaintiff was not selected for the position, yet Plaintiff continued to do the work.

66. The denial of Plaintiff's reappointment as Chairperson occurred after her pregnancy-related accommodations, FMLA leave, disability leave, multiple grievances, and unlawful demotion, and therefore constitutes retaliation for engaging in protected activity and opposing unlawful discrimination.

J. Continued Hostile Work Environment and Intimidation

67. On April 24, 2025, Plaintiff filed a third grievance against Defendant Stewart due to her continued retaliatory and harassing behavior.

68. This grievance included an incident at the Founders Honor and Awards Convocation where Defendant Stewart interrupted a professional conversation Plaintiff was having with colleagues and made a pointed and disparaging comment directed at Plaintiff in front of other faculty and staff.

69. No corrective action was taken in response to Plaintiff's grievances, and Defendant Stewart's retaliatory conduct continued unabated.

70. Defendant McGowan contributed to the hostile work environment by forcibly removing Plaintiff's personnel file from her hands in a public setting, demonstrating intimidation and interference with Plaintiff's rights to access her own employment records.

71. Defendant Stewart has deliberately leaked confidential information regarding Plaintiff's grievances and personnel matters to other employees, further contributing to a hostile and retaliatory work environment.

72. Defendant Stewart has spread false and defamatory rumors about Plaintiff, including the unfounded allegations regarding property damage, in an effort to undermine Plaintiff's professional reputation and create a pretext for adverse employment actions.

K. Filing of EEOC Charge and Further Retaliation

73. Plaintiff filed a Charge of Discrimination with the EEOC alleging pregnancy discrimination, disability discrimination, FMLA interference and retaliation, and related violations of federal law.

74. Plaintiff's filing of an EEOC Charge constitutes protected activity under Title VII, the ADA, the PWFA, and the FMLA. It also constitutes the exercise of Plaintiff's clearly established First Amendment and ACRA right to petition the government for redress of grievances.

75. Following Plaintiff's filing of the EEOC Charge, Defendants continued to retaliate against Plaintiff, including by continuing to deny her reinstatement to the Chairperson position, requiring her to perform Chairperson and coordinator duties without appropriate compensation, and maintaining a hostile work environment.

76. Defendants' retaliatory actions following the filing of the EEOC Charge were taken under color of state law and were designed to punish Plaintiff for exercising her constitutional and statutory rights.

COUNT I

PREGNANCY DISCRIMINATION IN VIOLATION OF THE PREGNANCY DISCRIMINATION ACT, 42 U.S.C. Â§ 2000e et seq and ARKANSAS STATE LAW

(Against Defendant University of Arkansas)

77. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

78. At all relevant times, Plaintiff was pregnant and qualified for her position as Chairperson of the Social Work Department.

79. Defendant System required her to perform Chairperson and coordinator duties without appropriate compensation and subjected Plaintiff to adverse employment actions, including interference with her approved pregnancy accommodation, demotion from Chairperson to

Associate Professor with a \$19,500 pay reduction, denial of reinstatement to the Chairperson position, and assignment of Chairperson and coordinator duties without appropriate compensation.

80. Defendant System's adverse employment actions were taken because of Plaintiff's pregnancy and in retaliation for Plaintiff's requests for pregnancy-related accommodation and leave.

81. Defendant System treated Plaintiff less favorably than similarly situated employees who were not pregnant.

82. Defendant System's discriminatory conduct was willful, intentional, and in reckless disregard of Plaintiff's federally and state protected rights.

83. As a direct and proximate result of Defendant System's pregnancy discrimination, Plaintiff has suffered and continues to suffer significant economic damage, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT II

FAILURE TO ACCOMMODATE IN VIOLATION OF THE PREGNANT WORKERS FAIRNESS ACT, 42 U.S.C. Â§ 2000gg et seq.

84. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

85. At all relevant times, Plaintiff had known limitations related to pregnancy, childbirth, and related medical conditions, including depression and anxiety related to pregnancy and postpartum complications.

86. Plaintiff requested reasonable accommodation, including telecommuting and FMLA leave, to address her pregnancy-related limitations.

87. Defendant System initially approved Plaintiff's pregnancy accommodation but then interfered with and attempted to reverse that accommodation through the actions of Defendant Stewart.

88. Defendant System failed to engage in a good-faith interactive process with Plaintiff regarding her pregnancy-related limitations and need for accommodation.

89. Defendant System required her to perform Chairperson and coordinator duties without appropriate compensation and failed to provide reasonable accommodation that would have allowed Plaintiff to continue performing the essential functions of her position.

90. Defendant System's failure to accommodate Plaintiff's pregnancy-related limitations was not based on undue hardship and constitutes wilful unlawful discrimination.

91. As a direct and proximate result of Defendant System's failure to accommodate, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damage including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT III

DISABILITY DISCRIMINATION AND FAILURE TO ACCOMMODATE IN VIOLATION OF SECTION 504 OF THE REHABILITATION ACT, 29 U.S.C. Â§ 794

(Against Defendant University of Arkansas)

92. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

93. Defendant System is a recipient of federal financial assistance and is therefore subject to Section 504 of the Rehabilitation Act.

94. At all relevant times, Plaintiff was an individual with a disability within the meaning of Section 504, including pregnancy-related depression and anxiety that substantially limited major life activities including thinking, concentrating, and caring for herself.

95. Plaintiff was otherwise qualified for her position as Chairperson and could perform the essential functions of that position with or without reasonable accommodation.

96. Plaintiff requested reasonable accommodation for her disability, including FMLA leave and modified work arrangements.

97. Defendant System required her to perform Chairperson and coordinator duties without appropriate compensation, failed to provide reasonable accommodation and discriminated against Plaintiff on the basis of her disability by demoting her, denying her reinstatement to the Chairperson position, and subjecting her to a hostile work environment.

98. Defendant System's discrimination was intentional and in reckless disregard of Plaintiff's federally protected rights.

99. As a direct and proximate result of Defendant System's disability discrimination, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT IV

**DISABILITY DISCRIMINATION AND FAILURE TO ACCOMMODATE IN
VIOLATION OF THE AMERICANS WITH DISABILITIES ACT, 42 U.S.C. Â§ 12101 et
seq. (Against Defendant University of Arkansas)**

100. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

101. At all relevant times, Plaintiff was an individual with a disability within the meaning of the ADA, including pregnancy-related depression and anxiety that substantially limited major life activities including thinking, concentrating, and caring for herself.

102. Plaintiff was otherwise qualified for her position as Chairperson and could perform the essential functions of that position with or without reasonable accommodation.

103. Plaintiff requested reasonable accommodations for her disability.

104. Defendant System failed to engage in a good-faith interactive process and failed to provide reasonable accommodations.

105. Defendant System required her to perform Chairperson and coordinator duties without appropriate compensation and subjected Plaintiff to adverse employment actions, including demotion, denial of promotion, and a hostile work environment, because of her disability and in retaliation for requesting accommodations.

106. As a direct and proximate result of Defendant System's disability discrimination, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT V

INTERFERENCE WITH AND RETALIATION IN VIOLATION OF THE FAMILY AND MEDICAL LEAVE ACT, 29 U.S.C. Â§ 2601 et seq.

(Against Defendant University of Arkansas and Defendants Stewart and McGowan in their individual capacities)

107. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

108. At all relevant times, Plaintiff was an eligible employee under the FMLA, having worked for Defendant System for more than twelve months and for at least 1,250 hours in the twelve months preceding her FMLA leave requests.

109. Defendant System is an employer covered by the FMLA, employing more than fifty employees within a seventy-five-mile radius.

110. Plaintiff timely and properly notified Defendants of her need for FMLA leave related to her pregnancy, childbirth, and related medical conditions.

111. Defendants failed to provide Plaintiff with timely and proper notice of her rights under the FMLA.

112. Defendants interfered with Plaintiff's FMLA rights by:

a. Attempting to reverse her approved pregnancy accommodation and pressure her to take FMLA leave prematurely;

b. Initiating a baseless investigation alleging Plaintiff was working another job during her FMLA leave;

c. Repeatedly contacting Human Resources to monitor and curtail Plaintiff's FMLA leave;

d. Sending confusing and contradictory communications regarding her job status while she was on approved leave;

Suggesting her Chairperson position could not be held for her during her leave; and

f. Creating a hostile environment designed to discourage her use of FMLA leave.

105. Defendants retaliated against Plaintiff for exercising her FMLA rights by:

a. Demoting her from Chairperson to Associate Professor with a \$19,500 pay reduction within 24 hours of her filing a grievance;

b. Denying her reinstatement to the Chairperson position when she reapplied in July 2025;

- c. Requiring her to perform Chairperson and coordinator duties without appropriate compensation;
- d. Subjecting her to a hostile work environment; and
- e. Taking other adverse employment actions designed to punish her for exercising her FMLA rights.

113. Defendants Stewart and McGowan, acting in their individual capacities and under color of state law, willfully violated Plaintiff's clearly established FMLA rights.

114. As a direct and proximate result of Defendants' FMLA interference and retaliation, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

115. Defendants' violations of the FMLA were willful, entitling Plaintiff to liquidated damages.

COUNT VI

**DISCRIMINATION IN VIOLATION OF THE ARKANSAS CIVIL RIGHTS ACT,
ARK. CODE ANN. Â§ 16-123-101 et seq.**

(Against Defendant University of Arkansas)

116. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

117. The Arkansas Civil Rights Act ("ACRA") and the Arkansas PDA prohibits discrimination on the basis of pregnancy and disability.

118. Defendant System discriminated against Plaintiff on the basis of her pregnancy and disability in violation of ACRA and the PDA by demoting her, denying her reinstatement to the

Chairperson position, interfering with her approved accommodations, requiring her to perform Chairperson and coordinator duties without appropriate compensation, and subjecting her to a hostile work environment.

119. As a direct and proximate result of Defendant System's violations of ACRA and PDA, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT VII

RETALIATION IN VIOLATION OF THE FIRST AMENDMENT

42 U.S.C. Â§ 1983

(Against Defendants Stewart and McGowan in their individual capacities)

120. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

121. The First Amendment to the United States Constitution and the Arkansas Constitution protects the right of citizens to petition the government for redress of grievances.

122. Plaintiff's filing of a Charge of Discrimination with the EEOC, a federal agency, constitutes petitioning the federal government for redress of grievances and is protected activity under the First Amendment and the Arkansas Constitution.

123. Plaintiff's filing of internal grievances with UAPB Human Resources and Title IX office regarding unlawful discrimination and harassment also constitutes speech on matters of public concern and/or petitioning for redress of grievances protected by the First Amendment.

124. At the time of the conduct alleged herein, it was clearly established that public employers could not retaliate against employees for filing EEOC charges or internal grievances concerning discrimination and harassment.

125. Defendants Stewart and McGowan, acting under color of state law and in their individual capacities, retaliated against Plaintiff for exercising her First Amendment rights by:

- a. Demoting her from Chairperson to Associate Professor with a \$19,500 pay reduction within 24 hours of her filing an internal grievance on November 25, 2024;
- b. Denying her reinstatement to the Chairperson position after she filed her EEOC Charge;
- c. Requiring her to perform Chairperson and field coordinator duties without appropriate compensation;
- d. Subjecting her to a hostile work environment;
- e. Spreading false accusations about her; and
- f. Taking other adverse employment actions designed to punish her for petitioning for redress of grievances.

126. Defendants Stewart and McGowan's retaliatory actions were motivated by Plaintiff's exercise of her First Amendment rights and were a substantial or motivating factor in the adverse employment actions taken against Plaintiff.

127. Defendants Stewart and McGowan are not entitled to qualified immunity because they violated Plaintiff's clearly established constitutional rights and no reasonable official in their positions could have believed their conduct was lawful.

128. As a direct and proximate result of Defendants Stewart and McGowan's violations of Plaintiff's First Amendment rights, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, and diminished earning capacity, as well

as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

COUNT VIII

DEFAMATION

(Against Defendants Stewart and McGowan in their individual capacities)

129. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein. Defendants Stewart and McGowan are not entitled to qualified immunity because they violated Plaintiff's clearly established constitutional rights and no reasonable official in their positions could have believed their conduct was lawful.

130. As alleged above, Stewart has defamed the Plaintiff and damaged her reputation.

131. As a direct and proximate result of Defendants Stewart, defamatory statements, Plaintiff has suffered and continues to suffer significant economic damages, including lost wages, lost benefits, lost reputation, and diminished earning capacity, as well as non-economic damages including severe emotional distress, mental anguish, humiliation, and damage to her professional reputation.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Dr. Tamara Pace-Glover respectfully requests that this Court enter judgment in her favor and against Defendants, and award the following relief:

A. A declaratory judgment that Defendants' actions violated the Pregnancy Discrimination Act, the Pregnant Workers Fairness Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Family and Medical Leave Act, the Arkansas Civil Rights Act, and the First Amendment to the United States Constitution.

B. An order reinstating and promoting Plaintiff to her former position as Chairperson of the Social Work Department with full compensation and benefits retroactive to January 1, 2025;

C. An award of back pay, front pay, and benefits, including the \$19,500 annual salary reduction, compensation for Plaintiff's uncompensated service as Field Coordinator from January 2025 through the date of judgment, and any other lost compensation from January 1, 2025, through the date of judgment and beyond.

D. An award of compensatory damages for economic losses, emotional distress, mental anguish, humiliation, damage to professional reputation, and other non-economic harm.

E. An award of liquidated damages against Defendants for willful violations of the FMLA and other federal laws;

F. An award of liquidated damages against Defendants Stewart and McGowan in their individual capacities for willful violations of the FMLA and other federal laws;

G. An award of punitive damages against Defendants Stewart and McGowan in their individual capacities for violations of 42 U.S.C. Â§ 1983.

H. An award of reasonable attorneys' fees and costs pursuant to 42 U.S.C. Â§ 1988, 42 U.S.C. Â§ 2000e-5(k), 42 U.S.C. Â§ 12117, 29 U.S.C. Â§ 794a, and other applicable fee-shifting statutes.

I. Appropriate injunctive and equitable relief, including orders directing Defendants to:

1. Cease all retaliatory conduct against Plaintiff and promote her.
2. Expunge all negative references to Plaintiff's demotion and adverse employment actions from her personnel file;
3. Provide training to administrators and supervisors regarding pregnancy discrimination, disability discrimination, FMLA rights, and retaliation.

Case 4:26-cv-00141-LPR Document 10 Filed 04/21/26 Page 25 of 25

4. Implement policies and procedures to prevent future violations of federal and state civil rights laws; and

J. Such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Respectfully submitted,

By:/s/ Luther O'Neal Sutter

Luther O'Neal Sutter (Ark. Bar No. 95031)

SUTTER & GILLHAM, PLLC

310 Natural Resources Drive, Suite 2

Little Rock, AR 72205

Telephone: (501) 315-1910

Email: luther.sutterlaw@gmail.com

ATTORNEY FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DR. TAMARA PACE-GLOVER

PLAINTIFF

v.

Case No. 4:26-cv-00141-LPR

BOARD OF TRUSTEES OF THE
UNIVERSITY OF ARKANSAS;
ANDREA STEWART, in her individual
capacity; and BRUCE McGOWAN, in his
individual capacity

DEFENDANTS

**DEFENDANTS' ANSWER
TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants Board of Trustees of the University of Arkansas, Andrea Stewart, in her individual capacity, and Bruce McGowan, in his individual capacity (“Defendants”) state as follows for their Answer to Plaintiff’s Second Amended Complaint:

1. Defendants deny the factual allegations in paragraph 1 of the Second Amended Complaint.
2. Defendants admit that Dr. Tamara Pace-Glover (“Glover”) is an Associate Professor at the University of Arkansas at Pine Bluff (“UAPB”) and admit that Glover was formerly the Chair of the Social Work Department at UAPB. Defendants deny the remaining factual allegations in paragraph 2 of the Second Amended Complaint.
3. Defendants admit that the Court has subject matter jurisdiction over Glover’s federal causes of action.

4. Defendants deny that the Court has supplemental jurisdiction over Glover's state law claims and affirmatively state that Glover's defamation claim should be dismissed.
5. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 5 of Glover's Second Amended Complaint, and therefore deny same.
6. Defendants admit that the Eastern District of Arkansas is the appropriate venue for Glover's federal claims. Defendants deny that this District is the proper venue for Glover's state law claims and affirmatively state that Glover's defamation claim should be dismissed.
7. Defendants admit that Glover is a resident of Jefferson County, Arkansas, that she is an Associate Professor in the Social Work Department UAPB, and that she was formerly the Chair of the Social Work Department at UAPB. Defendants deny the remaining factual allegations in paragraph 7 of Glover's Second Amended Complaint.
8. Defendants admit that UAPB is a public institution of higher education under Arkansas law, that UAPB receives federal funding, and that UAPB has more than fifty employees. Defendants deny the remaining factual allegations in paragraph 8 of the Second Amended Complaint.
9. Defendants admit that Andrea Stewart ("Stewart") was acting as Interim Chancellor or Provost at sometimes relevant to the Second Amended Complaint,

and admit that she is sued in her individual capacity. Defendants deny the remaining factual allegations in paragraph 9 of the Second Amended Complaint.

10. Defendants admit that Bruce McGowan (“McGowan”) was acting as Interim Provost or was Provost at sometimes relevant to the Second Amended Complaint, and admit that McGowan is sued in his individual capacity. Defendants deny the remaining factual allegations in paragraph 10 of the Second Amended Complaint.

11. Defendants admit that Glover was hired in 2021, admit that she was formerly the Chair of the Social Work Department, and admit that the Chair position was a twelve-month administrative appointment. Defendants deny the remaining factual allegations in paragraph 11 of the Second Amended Complaint.

12. Defendants admit that Glover is a Licensed Clinical Social Worker (“LCSW”).

13. Defendants admit that Glover was qualified for her position as Chair. Defendants deny the remaining factual allegations in paragraph 13 of the Second Amended Complaint.

14. Defendants admit that factual allegations regarding Glover’s duties as department chair, admit that Felicia Cooper currently serves and interim chair of the department, and deny the remaining factual allegations in paragraph 14 of the Second Amended Complaint.

15. Defendants admit that in April of 2023, Glover requested to work from home due to medical limitations associated with her pregnancy.

16. Defendants admit the factual allegations in paragraph 16 of the Second Amended Complaint.

17. Defendants deny the factual allegations in paragraph 17 of the Second Amended Complaint.
18. Defendants deny the factual allegations in paragraph 18 of the Second Amended Complaint.
19. Defendants admit Glover was approved for FMLA leave in May 2023.
20. Defendants deny the factual allegations in paragraph 20 of the Second Amended Complaint.
21. Defendants deny the factual allegations in paragraph 21 of the Second Amended Complaint.
22. Defendants deny the factual allegations in paragraph 22 of the Second Amended Complaint.
23. Defendants admit that Plaintiff used short-term disability and long-term disability leave. Defendants deny the remaining factual allegations in paragraph 23 of the Second Amended Complaint.
24. Defendants deny the factual allegations in paragraph 24 of the Second Amended Complaint.
25. Defendants admit that after Glover had been absent from work for eleven consecutive months, Glover was sent a letter setting a return to work date. Defendants deny the remaining factual allegations in paragraph 25 of the Second Amended Complaint.
26. Defendants deny the factual allegations in paragraph 26 of the Second Amended Complaint.

27. Defendants admit UAPB worked with Glover to adjust her return to work date.

Defendants deny the remaining factual allegations in paragraph 27 of the Amended Complaint.

28. Defendants admit Glover was advised it was an undue hardship for UAPB to continue to operate without a Chair of the Social Work Department after eleven months. Defendants deny the remaining factual allegations in paragraph 28 of the Second Amended Complaint.

29. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 29 of the Second Amended Complaint and therefore deny same.

30. Defendants deny the factual allegations in paragraph 30 of the Second Amended Complaint.

31. Defendants admit that Wangila met with Glover as part of the ADA interactive process prior to her return to work. Defendants deny the remaining factual allegations in paragraph 31 of the Second Amended Complaint.

32. Defendants admit the factual allegations in paragraph 32 of the Second Amended Complaint.

33. Separate Defendants deny the factual allegations in paragraph 33 of the Second Amended Complaint.

34. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 34 of the Second Amended Complaint and therefore deny same.

35. Defendants deny the factual allegations in paragraph 35 of the Second Amended Complaint.

36. Defendants deny the factual allegations in paragraph 36 of the Second Amended Complaint.

37. Defendants deny the factual allegations in paragraph 37 of the Second Amended Complaint.

38. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 38 of the Second Amended Complaint and therefore deny same.

39. Defendants deny the factual allegations in paragraph 39 of the Second Amended Complaint.

40. Defendants deny that Stewart made false allegations against Glover, admit that Glover cut locks, broke into an office, and damaged university property, and deny that the office was abandoned. Defendants deny any remaining factual allegations in paragraph 40 of the Second Amended Complaint

41. Defendants deny the factual allegations in paragraph 41 of the Second Amended Complaint.

42. Defendants deny the factual allegations in paragraph 42 of the Second Amended Complaint.

43. Defendants admit Glover sent a document purporting to be a grievance to Human Resources via email at 9:27 p.m. on November 25, 2024. Defendants deny the remaining factual allegations in paragraph 43 of the Second Amended Complaint.

44. Defendants admit that Human Resources emailed Glover on November 26, 2024, advising that her complaint was not a grievable matter and would be reviewed for potential application of Title IX. Defendants deny the remaining factual allegations in paragraph 44 of the Second Amended Complaint.
45. Defendants admit that Wangila sent Glover a letter advising that her Chair position would terminate effective December 31, 2024, at which time she would return to a nine-month faculty appointment. Defendants deny the remaining factual allegations in paragraph 45 of the Second Amended Complaint.
46. Defendants admit that Glover's removal as Chair of the Social Work Department resulted in a decrease in pay pursuant to Board policy. Defendants deny the remaining factual allegations in paragraph 46 of the Second Amended Complaint.
47. Defendants deny the factual allegations in paragraph 47 of the Second Amended Complaint.
48. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 48 of the Second Amended Complaint and therefore deny same.
49. Defendants deny the factual allegations in paragraph 49 of the Second Amended Complaint.
50. Defendants deny the factual allegations in paragraph 50 of the Second Amended Complaint.

51. Defendants admit that Glover serves as field coordinator for the Social Work Department. Defendants deny the remaining factual allegations in paragraph 51 of the Second Amended Complaint.

52. Defendants deny the factual allegations in paragraph 52 of the Second Amended Complaint.

53. Defendants deny the factual allegations in paragraph 53 of the Second Amended Complaint.

54. Defendants admit that Glover serves as the field coordinator for the Social Work Department and deny the remaining factual allegations in paragraph 54 of the Second Amended Complaint. Defendants specifically deny that field coordinator is a separate and distinct role entitled to additional compensation.

55. Defendants admit that Glover serves as the field coordinator for the Social Work Department and that the field coordinator role does not come with additional compensation. Defendants deny the remaining factual allegations in paragraph 55 of the Second Amended Complaint.

56. Defendants admit that Glover serves as the field coordinator for the Social Work Department and that the field coordinator role does not come with additional compensation. Defendants deny the remaining factual allegations in paragraph 56 of the Second Amended Complaint.

57. Defendants admit that Glover was asked to sign a letter acknowledging that she had been performing the duties of field coordinator since at least January of 2026.

Defendants deny the remaining factual allegations in paragraph 57 of the Second Amended Complaint.

58. Defendants deny the factual allegations in paragraph 58 of the Second Amended Complaint.

59. Defendants deny the factual allegations in paragraph 59 of the Second Amended Complaint.

60. Defendants deny the factual allegations in paragraph 60 of the Second Amended Complaint.

61. Defendants admit that Glover serves as the field coordinator for the Social Work Department and that the field coordinator role does not come with additional compensation. Defendants deny the remaining factual allegations in paragraph 61 of the Second Amended Complaint.

62. Defendants admit that the Chair of the Social Work Department position was advertised and that Glover applied for the position which she had recently been removed from for disciplinary reasons. Defendants deny the remaining factual allegations in paragraph 62 of the Second Amended Complaint and specifically deny that Glover was unlawfully removed from the Chair position.

63. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 63 of the Second Amended Complaint and therefore deny same.

64. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 64 of the Second Amended Complaint and therefore deny same.

65. Defendants deny the factual allegations in paragraph 65 of the Second Amended Complaint.

66. Defendants deny the factual allegations in paragraph 66 of the Second Amended Complaint.

67. Defendants deny the factual allegations in paragraph 67 of the Second Amended Complaint.

68. Defendants deny the factual allegations in paragraph 68 of the Second Amended Complaint.

69. Defendants deny the factual allegations in paragraph 69 of the Second Amended Complaint.

70. Defendants deny the factual allegations in paragraph 70 of the Second Amended Complaint.

71. Defendants deny the factual allegations in paragraph 71 of the Second Amended Complaint.

72. Defendants deny the factual allegations in paragraph 72 of the Second Amended Complaint.

73. Defendants admit Glover has filed multiple charges with the EEOC. Defendants deny the remaining factual allegations in paragraph 73 of the Second Amended Complaint.

74. Paragraph 74 of the Second Amended Complaint contains only legal conclusions that do not require a response. Defendants deny any factual allegations in paragraph 74 of the Second Amended Complaint.
75. Defendants deny the factual allegations in paragraph 75 of the Second Amended Complaint.
76. Defendants deny the factual allegations in paragraph 76 of the Second Amended Complaint and specifically deny that they have taken any retaliatory actions against Glover.
77. Paragraph 77 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-77 of this Answer.
78. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 78 of the Second Amended Complaint and therefore deny same.
79. Defendants deny the factual allegations in paragraph 79 of the Second Amended Complaint.
80. Defendants deny the factual allegations in paragraph 80 of the Second Amended Complaint and specifically deny that they have taken any retaliatory actions against Glover.
81. Defendants deny the factual allegations in paragraph 81 of the Second Amended Complaint.

82. Defendants deny the factual allegations in paragraph 82 of the Second Amended Complaint.

83. Defendants deny the factual allegations in paragraph 83 of the Second Amended Complaint.

84. Paragraph 84 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-83 of this Answer.

85. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 85 of the Second Amended Complaint and therefore deny same.

86. Defendants admit that during her employment Glover requested accommodations, including telecommuting, and FMLA leave, both of which she was granted. Defendants deny the remaining factual allegations in paragraph 86 of the Second Amended Complaint.

87. Defendants admit that they approved pregnancy accommodations for Glover. Defendants deny the remaining factual allegations in paragraph 87 of the Second Amended Complaint.

88. Defendants deny the factual allegations in paragraph 88 of the Second Amended Complaint.

89. Defendants deny the factual allegations in paragraph 89 of the Second Amended Complaint.

90. Defendants deny the factual allegations in paragraph 90 of the Second Amended Complaint and specifically deny that they failed to accommodate Glover.
91. Defendants deny the factual allegations in paragraph 91 of the Second Amended Complaint
92. Paragraph 92 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-91 of this Answer.
93. Defendants admit the factual allegations in paragraph 93 of the Second Amended Complaint.
94. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 94 of the Second Amended Complaint and therefore deny same.
95. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 95 of the Second Amended Complaint and therefore deny same.
96. Defendants admit that during her employment Glover requested accommodations and FMLA leave, both of which she was granted. Defendants deny the remaining factual allegations in paragraph 96 of the Second Amended Complaint.
97. Defendants deny the factual allegations in paragraph 97 of the Second Amended Complaint.
98. Defendants deny the factual allegations in paragraph 98 of the Second Amended Complaint and specifically deny that they discriminated against Glover.

99. Defendants deny the factual allegations in paragraph 99 of the Second Amended Complaint.

100. Paragraph 100 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-99 of this Answer.

101. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 101 of the Second Amended Complaint and therefore deny same.

102. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 102 of the Second Amended Complaint and therefore deny same.

103. Defendants admit that Glover requested and received accommodations during her employment. Defendants deny the remaining factual allegations in paragraph 103 of the Second Amended Complaint.

104. Defendants deny the factual allegations in paragraph 104 of the Second Amended Complaint.

105. Defendants deny the factual allegations in paragraph 105 of the Second Amended Complaint.

106. Defendants deny the factual allegations in paragraph 106 of the Second Amended Complaint.

107. Paragraph 107 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-106 of this Answer.
108. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 108 of the Second Amended Complaint and therefore deny same.
109. Defendants admit the factual allegations in paragraph 109 of the Second Amended Complaint.
110. Defendants are without sufficient information to admit or deny the factual allegations in paragraph 110 of the Second Amended Complaint and therefore deny same.
111. Defendants deny the factual allegations in paragraph 111 of the Second Amended Complaint.
112. Defendants deny the factual allegations in paragraph 112 of the Second Amended Complaint.
- a. Defendants deny the factual allegations in paragraph 112(a) of the Second Amended Complaint.
 - b. Defendants deny the factual allegations in paragraph 112(b) of the Second Amended Complaint.
 - c. Defendants deny the factual allegations in paragraph 112(c) of the Second Amended Complaint.

- d. Defendants deny the factual allegations in paragraph 112(d) of the Second Amended Complaint.
- e. Defendants state that there is no paragraph 112(e) of the Second Amended Complaint. Defendants deny the factual allegations in the unnumbered paragraph between 112(d) and 112(f) of the Second Amended Complaint.
- f. Defendants deny the factual allegations in paragraph 112(f) of the Second Amended Complaint.

113. Defendants deny the factual allegations in the second paragraph numbered 105 in the Second Amended Complaint.

- a. Defendants deny the factual allegations in paragraph 105(a) of the Second Amended Complaint.
- b. Defendants deny the factual allegations in paragraph 105(b) of the Second Amended Complaint.
- c. Defendants deny the factual allegations in paragraph 105(c) of the Second Amended Complaint.
- d. Defendants deny the factual allegations in paragraph 105(d) of the Second Amended Complaint.
- e. Defendants deny the factual allegations in paragraph 105(e) of the Second Amended Complaint.

114. Defendants deny the factual allegations in paragraph 113 of the Second Amended Complaint.

115. Defendants deny the factual allegations in paragraph 114 of the Second Amended Complaint.

116. Defendants deny the factual allegations in paragraph 115 of the Second Amended Complaint.

117. Paragraph 116 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-116 of this Answer.

118. Paragraph 117 of the Second Amended Complaint contains no factual allegations that require a response.

119. Defendants deny the factual allegations in paragraph 118 of the Second Amended Complaint.

120. Defendants deny the factual allegations in paragraph 119 of the Second Amended Complaint.

121. Paragraph 120 of the Second Amended Complaint contains no factual allegations that require a response. Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-120 of this Answer.

122. Paragraph 121 of the Second Amended Complaint contains no factual allegations that require a response.

123. Paragraph 122 of the Second Amended Complaint contains only legal conclusions which do not require a response. Defendants deny any factual allegations in paragraph 122 of the Second Amended Complaint.
124. Paragraph 123 of the Second Amended Complaint contains only legal conclusions which do not require a response. Defendants deny any factual allegations in paragraph 123 of the Second Amended Complaint.
125. Paragraph 124 of the Second Amended Complaint contains only legal conclusions which do not require a response. Defendants deny any factual allegations in paragraph 124 of the Second Amended Complaint.
126. Defendants deny the factual allegations in paragraph numbered 125 in the Second Amended Complaint.
- a. Defendants deny the factual allegations in paragraph 125(a) of the Second Amended Complaint.
 - b. Defendants deny the factual allegations in paragraph 125(b) of the Second Amended Complaint.
 - c. Defendants deny the factual allegations in paragraph 125(c) of the Second Amended Complaint.
 - d. Defendants deny the factual allegations in paragraph 125(d) of the Second Amended Complaint.
 - e. Defendants deny the factual allegations in paragraph 125(e) of the Second Amended Complaint.

f. Defendants deny the factual allegations in paragraph 125(f) of the Second Amended Complaint.

127. Defendants deny the factual allegations in paragraph 126 of the Second Amended Complaint.

128. Paragraph 127 of the Second Amended Complaint contains only legal conclusions which do not require a response. Defendants deny any factual allegations in paragraph 127 of the Second Amended Complaint.

129. Defendants deny the factual allegations in paragraph 128 of the Second Amended Complaint.

130. In response to paragraph 129 of the Second Amended Complaint, Defendants reincorporate and re-state by reference the admissions, denials, and responses in paragraph 1-129 of this Answer. Defendants deny any remaining factual allegations in paragraph 129 of the Second Amended Complaint.

131. Defendants deny the factual allegations in paragraph 130 of the Second Amended Complaint.

132. Defendants deny the factual allegations in paragraph 131 of the Second Amended Complaint.

133. Defendants state that Glover is not entitled to the relief requested in her prayer for relief.

134. Defendants state that Glover is not entitled to declaratory relief.

135. Defendants affirmatively state that they did not violate the Pregnancy Discrimination Act, the Pregnant Workers Fairness Act, Section 504 of the

Rehabilitation Act, the American with Disabilities Act, the Family Medical Leave Act, the Arkansas Civil Rights Act, or the First Amendment to the United States Constitution.

136. Defendants state that Glover is not entitled to reinstatement, promotion, or retroactive pay and benefits.
137. Defendants state that Glover is not entitled to back pay, front pay, or benefits of any kind.
138. Defendants state that Glover is not entitled to an award of compensatory damages of any kind.
139. Defendants state that Glover is not entitled to liquidated damages.
140. Defendants state that Glover is not entitled to punitive damages.
141. Defendants state that Glover is not entitled to attorneys' fees.
142. Defendants state that Glover is not entitled to the relief requested in paragraph I of the prayer for relief of the Second Amended Complaint, and that such relief is beyond the jurisdiction of this Court.
143. Defendants deny any factual allegations in the Second Amended Complaint that are not specifically admitted in this Answer.
144. Defendants deny that their conduct violated the FMLA, ADA, ACRA, PWFA, PDA, or the First Amendment.
145. Defendants deny that their conduct constituted defamation against Plaintiff.
146. Defendants deny that the conduct alleged was willful.

147. Defendants affirmatively state that Glover has failed to state a claim for relief against Defendants.
148. Defendants affirmatively state that the Board and individual defendants are entitled to sovereign immunity and Eleventh Amendment immunity.
149. Defendants affirmatively state that Stewart and McGowan are entitled to qualified immunity in the individual capacities.
150. Defendants affirmatively state that Glover's claims are barred for failure to timely exhaust her administrative remedies.
151. Defendants affirmatively state that Glover's claims are barred by the applicable statute of limitations.
152. Defendants affirmatively state that Glover was not subjected to a hostile work environment.
153. Defendants affirmatively state that Glover failed to mitigate her purported damages.
154. Defendants affirmatively state that Defendants acted in good faith at all times relevant to the Second Amended Complaint.
155. Defendants reserve the right to amend this Answer.

WHEREFORE, Defendants pray that the Court dismiss Plaintiff's Second Amended Complaint and for all other just and proper relief to which they are entitled.

Respectfully submitted,

UNIVERSITY OF ARKANSAS
OFFICE OF THE GENERAL COUNSEL

Amber R. Schubert (2009150)
Associate General Counsel
University of Arkansas System
2404 North University Ave.
Little Rock, AR 72207-3608
Telephone: (501) 686-2518
aschubert@uasys.edu

Attorney for Defendants