

RETURN DATE: May 17, 2022 : SUPERIOR COURT

SAGE STEELE : J.D. OF HARTFORD

V. : AT HARTFORD

ESPN PRODUCTIONS, INC. and

THE WALT DISNEY COMPANY : APRIL 27, 2022

COMPLAINT

1. Plaintiff Sage Steele is, and at all relevant times was, an individual residing in Avon, Connecticut.

2. Connecticut law prohibits private employers from disciplining their employees for engaging in constitutionally protected speech, whether that speech takes place in the workplace or outside of it. Nevertheless, when the Plaintiff, Sage Steele (“Steele”), made certain public comments - on her own time and on matters of significant public interest (and thus clearly protected under both the United States Constitution and the Constitution of the State of Connecticut) - her employers, Defendants ESPN Productions, Inc. (“ESPN”) and The Walt Disney Company (“Disney”), illegally subjected her to substantial workplace penalties.

3. Defendants based their retaliatory actions on inaccurate third-party accounts of Steele’s comments, and concededly did not immediately review the actual comments or the context in which they were made. As a result, Defendants made no efforts to correct inaccurate and harmful reporting about their employee, Steele, and took no steps to correct or discipline coworkers who, based on the same inaccurate, third-party accounts, took it upon themselves to harass and condemn Steele for expressing an opinion. Though Defendants based their punitive actions against Steele on a supposed workplace policy barring political commentary, they repeatedly have ignored commentary from other employees – both before and after they penalized Steele for expressing her opinion - that was more political and more controversial than the comments made by Steele, and that in some cases was overtly disrespectful to Steele.

4. In response to Defendants' violation of her constitutional and statutory rights, in February 2022, Steele submitted a human resources complaint putting Defendants on notice of their wrongdoing. She followed with a letter from her attorneys. Tellingly, after months of Defendants withholding prime hosting assignments from Steele as punishment, when they received her complaint and attorney's letter, they promptly offered her the assignment of co-hosting coverage at The Masters Tournament in a blatant admission of liability and an obvious scheme to try to dodge responsibility.

5. Defendants have thus violated Connecticut law and Steele's rights to free speech based upon a faulty understanding of her comments and a nonexistent, unenforced workplace policy that serves as nothing more than pretext. As a result, Plaintiff brings these claims seeking remedies for the harms caused by Defendants' conduct.

COUNT ONE: Violation of General Statutes § 31-51q by Disciplining Employee for Constitutionally Protected Speech.

6. Plaintiff Sage Steele is, and at all relevant times was, an individual residing in Avon, Connecticut.

7. ESPN Productions, Inc. is, and at all relevant times was, a Delaware corporation doing business in Bristol, Connecticut, with its principal place of business in Bristol, Connecticut.

8. The Walt Disney Company is, and at all relevant times was, a Delaware corporation doing business in Bristol, Connecticut.

9. Steele alleges on information and belief that ESPN and Disney, at all times relevant to this action, were the agents, servants, partners, joint venturers and employees of each other. ESPN and Disney, in doing the acts alleged herein, were acting with the knowledge and consent of each of the other defendants in this action. At all times mentioned herein, each of the defendants was the co-conspirator, agent and/or employee of each of the remaining defendants and in doing the things herein mentioned was acting within the scope of such co-conspiracy, agency and/or employment.

A. Steele's Storied Career at ESPN

10. Steele has devoted her entire career to pursuing her childhood dream of hosting ESPN's *SportsCenter*. She has been proud to do so and has taken pride in her accomplishments at ESPN since 2007.

11. Steele has worked tirelessly under immensely stressful circumstances, at times in the absence of institutional support, to drive *SportsCenter*'s tradition of excellence in sports journalism.

12. Steele has become one of ESPN's most popular sportscasters and has broken new ground as she rose through the ranks.

B. Steele Exercises Her Constitutionally Protected Right to Free Speech

13. In the summer of 2021, Disney announced a policy requiring its salaried and non-union workers to be "fully vaccinated" against COVID-19 by September 30, 2021. Steele was subject to this vaccine mandate. Despite deep personal objections to a privately mandated vaccination policy and her hesitance to receive the vaccine, she complied with the mandate and received her vaccination as required in order to keep her job.

14. When Defendants moved the goalposts for compliance with their vaccine policy again in 2022 by requiring booster shots, even though the Centers for Disease Control had not (and to date has not) changed its definition of "fully vaccinated" to include any requirement for a booster shot, Steele again complied by getting the required booster shot. Steele is in full compliance with Defendants' vaccine policy.

15. On September 13, 2021, Steele appeared on a podcast, "Uncut with Jay Cutler," where she was interviewed by the podcast's host. During the interview, Steele, who had just come from getting her vaccination shot, was asked why she had a band-aid on her arm. Steele made it clear that she had just been vaccinated against COVID-19 in compliance with Disney policy. She also indicated that while she "respect[ed] everyone's decision" to get vaccinated, she believed that a corporate mandate was "sick" and "scary to me in many ways." She also indicated that she "didn't want to" get the vaccine but still complied in order to keep her job and support her family.

16. Steele appeared on the podcast as a private citizen on her day off, and made it clear

during the interview that she was speaking on her own behalf, not on behalf of ESPN or Disney.

17. During the podcast interview, Steele also offered some frank, unguarded thoughts about media criticism and the refusal of some individuals to accept opinions unlike their own, or not in accord with those they assume are held by others based on appearance, gender, etc. In this context, when she was asked about her experience as a biracial woman, Steele noted that Barbara Walters once challenged her (on the ABC program *The View*, owned by Disney) on her biracial identity.

18. When Jay Cutler brought up racial identity during the discussion on his podcast, Steele noted her pride in her own biracial identity, musing on how biracial people are pigeonholed into identifying with one race only. Steele explained how important it is to her to identify with both her Black family and her white family, and how fortunate she is to have been raised in such a diverse, accepting family. Steele also discussed this topic on *The View* in 2014, when Walters asked her why she didn't just identify as Black like President Barack Obama did. In relaying the story to Cutler, Steele responded that it was "fascinating" that President Obama had chosen to identify as Black despite having been raised by his white mother and grandmother, concluding, "You do you. I'm going to do me." Notably, Steele did not in any way criticize President Obama; she merely relayed her personal experience as a biracial woman.

19. Steele also gave her opinions on locker room interactions between male athletes and female reporters, and how both parties were responsible for negotiating those interactions professionally.

20. Throughout the podcast, Steele's comments were measured and respectful. She repeatedly recognized the value of the opinions of those who might disagree with her, and at all times was simply voicing her personal views on matters of public concern.

21. The podcast episode was made public on or about September 29, 2021 and media coverage erupted.

22. Media reports slammed Steele, some misquoting and many taking her comments out of context, calling her comments "appalling," "awful," "bonkers," and "nasty." *See, e.g.,* T.J. Macias, "Sage Steele, ESPN Speak Out After Anchor's Podcast Comments 'Create Controversy,'"

Miami Herald (Oct. 5, 2021), <https://www.miamiherald.com/news/nation-world/national/article254771602.html>; Danielle Cohen, “This Is an Impressive Number of Bad Opinions,” *The Cut* (Oct. 6, 2021), <https://www.thecut.com/2021/10/sage-steele-this-is-an-impressive-number-of-bad-opinions.html>.

23. Social media also erupted in a frenzy. Jemele Hill, Steele’s former colleague at ESPN, called Steele a “clown” on Twitter for her comments. Brenda Alexander, “Sage Steele Removed from ESPN Following Comments on Obama, Vaccine; Former Colleague Jemele Hill Calls Her Out,” *Yahoo! News* (Oct. 5, 2021), <https://www.yahoo.com/video/sage-steele-suspended-podcast-comments-174500917.html>.

24. In a knee-jerk reaction, ESPN and Disney relied on the misleading characterizations of her comments, bowed to groupthink and forced Steele to publicly apologize and suspended her for a period of time in October 2021.

C. ESPN and Disney Punish Steele for Her Exercise of Her Free Speech Rights

25. Shortly after taking part in the podcast interview, Steele tested positive for COVID-19, despite having recently been vaccinated.

26. On the evening of Sunday, October 3, 2021, while she was quarantined, Steele was contacted by Rosetta Ellis, the head of the ESPN talent department, who began the conversation by asking whether Steele was “okay,” apparently referring to her mental state. Ellis then asked Steele questions about Steele’s comments on the podcast. When Steele asked Ellis if she had listened to the podcast, Ellis admitted she had not.

27. The next day, on October 4, 2021, Steele was informed that she would be “sidelined” or “taking a break” (euphemisms for “suspended”) and would be required to issue a public apology for her comments. ESPN senior vice president Norby Williamson spoke with Steele that day and reprimanded her for having “whacked the company.” He went on to ask if Steele was “okay” because she had been “liking and tweeting” certain things.

28. Despite feeling she had done nothing that required an apology, Steele was sent suggested apology language by ESPN PR, which she edited and, under threat of losing her job, was forced to issue.

29. ESPN hypocritically followed her apology with a statement that read in part, “we embrace different points of view – dialogue and discussion makes this place great. That said we expect that those points of view be expressed respectfully, in a manner consistent with our values, and in line with our internal policies.” These sentiments are wholly undermined by ESPN and Disney’s punitive response to Steele’s completely respectful exercise of her constitutionally protected right of free speech.

30. Steele was initially to return to broadcasting on October 12, 2021, but was sidelined until October 14, 2021.

31. During Steele’s absence from broadcasting, it was widely reported in the media that ESPN had “suspended” Steele for her comments on the podcast. *See, e.g.,* Matthew Miller, “Sage Steele Suspended from ESPN for Controversial Remarks Regarding Race, COVID Vaccine,” *Yahoo! Sports* (Oct. 5, 2021), <https://sports.yahoo.com/sage-steele-suspended-espn-controversial-203800107.html?src=rss>; Rashad Grove, “Sage Steele Suspended from ESPN After Controversial Remarks on Vaccine Mandates, Female Journalists, and President Obama,” *Ebony* (Oct. 6, 2021), https://www.ebony.com/entertainment/tv_film/sage-steele-suspended-from-espn-after-controversial-remarks-on-vaccine-mandates-female-journalists-and-president-obama/; “Clay Travis: ESPN’s Suspension of Sage Steele ‘Absolute Madness,’” *Fox News* (Oct. 7, 2021), <https://www.foxnews.com/media/clay-travis-espn-suspending-sage-steele-vaccine>.

32. ESPN did nothing to rebut the widespread reports that it had suspended or otherwise disciplined Steele for her comments, both because those reports were true and because ESPN stood to benefit from the public perception that it had punished Steele for her remarks.

33. The day before Steele’s return to broadcasting, she had a conversation with Jill Fredrickson, senior vice president of *SportsCenter*, who said that some of Steele’s coworkers were “hurt” by her comments on the podcast (though Steele later learned that Fredrickson had been fishing for this response by asking employees directly if they were hurt). When Steele asked Fredrickson if she had listened to the podcast, Fredrickson demurred, saying the podcast was too long.

34. ESPN and Disney have continued to punish Steele by removing her from prime

assignments, including coverage of the New York City Marathon, the Rose Parade, and the 12th Annual ESPNW Summit, which Steele had hosted and emceed since its inception in 2010. At the ESPNW Summit on October 18, 2021 - two full weeks after Steele was suspended, was already back on air, and media attention had died down - Laura Gentile, ESPN and Disney Network's executive vice president of commercial marketing, made opening comments condemning Steele, in violation of company policy prohibiting ESPN employees from publicly making personal attacks on their colleagues. Gentile went on to explain to the hundreds of attendees (including media) as well as the tens of thousands of live-stream viewers that ESPN had "elected" to have Steele "sit this one out" as a result of her comments. In other words, Gentile openly admitted that ESPN was taking disciplinary action against Steele as a direct result of her constitutionally protected exercise of free speech rights. Adding insult to injury, this was done at an event conceived to celebrate and elevate diverse female voices and perspectives.

35. ESPN even put pressure on The V Foundation, a cancer charity co-founded by ESPN, to remove Steele, a member of the V Foundation board of directors, from her role as host of a fundraiser honoring her dear friend, the late Stuart Scott, on December 6, 2021.

36. Many other ESPN personalities have publicly criticized and flouted ESPN's policies over the years yet have faced no repercussions for their actions. It is clear that ESPN selectively enforces its policies based on whether it agrees with the political views of the employees in question. For example:

a. In January 2017, then-ESPN personality Dan LeBatard slammed Steele for an Instagram post she made commenting that she had missed her flight because of protests of the Trump "Muslim ban" at the Los Angeles airport. On his national ESPN radio show, as well as on social media, LeBatard vocally criticized ESPN's policy barring broadcasters from speaking about the Muslim ban, and openly declared he would refuse to follow the policy. LeBatard faced no repercussions from ESPN for his insubordination and public criticism of both ESPN and his colleague.

b. In September 2017, Jemele Hill, then the 6 p.m. *SportsCenter* anchor, went on a Twitter rant in which she called then-President Trump a "white supremacist who has largely

surrounded himself with other white supremacists.” Hill was not disciplined in any way; she merely issued a statement on social media, without apologizing or taking any responsibility for her divisive comments in violation of supposed ESPN policy requiring employees to refrain from publicly commenting on political matters.

c. In July 2019, LeBatard sharply criticized ESPN’s purported policy against political commentary, calling it “cowardly.” He then went on to condemn one of President Trump’s rallies, calling the president an “old white man” who “instigated” racial division. Again, LeBatard experienced no repercussions from ESPN for his comments, even though he criticized the network on its own airtime.

37. Steele has also been publicly bullied by her colleagues, in direct violation of ESPN policy, yet those colleagues have faced no disciplinary action whatsoever, despite Steele’s efforts to bring those attacks to the attention of Disney and ESPN executives.

38. As just one example, in October 2021, fellow *SportsCenter* anchor Nicole Briscoe retweeted a post from someone who said she hoped ESPN no longer uses Ms. Steele to cover women’s sporting events, with Ms. Briscoe adding, “Amen. (Even if it gets me in trouble.) Amen.”

39. Steele had previously spoken with Norby Williamson about many similar examples of employee retaliation. He told her to inform him when she was attacked by coworkers on social media because he could not keep track of everything on social media, and that if Steele alerted him to the attacks, he would remind anchors who violated ESPN policy not to criticize their fellow employees and to take down the attacking posts.

40. In keeping with Williamson’s instructions, Steele sent a screenshot of Briscoe’s tweet to Williamson, who claimed he was “on it.” Yet the post remained on her account, publicly accessible for more than three months afterward.

41. In addition, on November 12, 2021, ESPN NFL analyst Ryan Clark refused to appear on air with Steele because of her comments and asked her boss to replace her with her co-host for the segment. When Clark did not get his way, he did not do the show, and he suffered no penalty from ESPN as a result.

42. Countless ESPN employees, including Briscoe, LeBatard when he was with the

network, Sarah Spain, Mark Jones, Mina Kimes, Damien Woody, and others openly and publicly criticized Steele in direct violation of ESPN policy without any repercussions whatsoever. Disney and ESPN stand by and allow Steele to be bullied and harassed, and in doing so, they punish Steele for expressing her views in exercise of her First Amendment rights.

43. ESPN's lack of response to the comments made by Briscoe, LeBatard and others also demonstrates the pretextual nature of ESPN's purported reliance on a policy against permitting on-air employees to engage in public political commentary. Countless numbers of Steele's on-air peers continue in a sustained pattern spanning many years of plainly engaging in public commentary on political matters, but none of them faced any discipline whatsoever for doing so. If ESPN truly embraced inclusion and diversity, it would embrace diversity of opinions.

44. In a more recent and extreme example, during the weekend of March 18-20, 2022, during ESPN's live coverage of the NCAA women's basketball tournament, ESPN host Elle Duncan led a "moment of silence" in opposition to Florida's "Parental Rights in Education" bill, which would restrict discussions on sexual orientation and gender identity in public school classrooms for the grades kindergarten through third grade. The "moment of silence" was prefaced with commentary about the bill. In broadcasting the "moment of silence" and commentary on the bill, Defendants took a stand on a divisive political issue that was highly produced and scripted in advance, with several meetings and conference calls taking place beforehand to plan the demonstration.

45. Before the two-minute "moment of silence," Duncan said, "We understand the gravity of this legislation and also how it's affecting so many families across this country, and because of that, our allyship is going to take a front seat, and with that, we're going to pause in solidarity." Later that day, another "moment of silence" took place on ESPN airwaves when fellow broadcasters Courtney Lyle and Carolyn Peck introduced it with more scripted comments about Florida's bill. Anais Bailey, "ESPN Announcers Stay Silent During Women's March Madness broadcast to Protest Florida Bill," *USA Today* (Mar. 20, 2022).

<https://www.usatoday.com/story/sports/ncaaw/2022/03/20/march-madness-espn-announcers-protest-florida-bill-moment-silence/7113874001/>. In addition, ESPN announcers Pam Ward and Stephanie

White held a third moment of silence and commented on the “dangerous bill.” Unlike Steele’s podcast comments, the “moments of silence” and associated political commentary took place on ESPN’s own airwaves, the broadcasters were speaking in their capacity as ESPN employees, not private citizens, and it was clearly produced by the network. In other words, with this action, ESPN violated its own policy against engaging in political commentary.

46. ESPN’s inconsistency in how it treated Steele as compared to her peers demonstrates that Steele was punished not only for exercising her constitutional right to free speech but because of the *content* of that speech. Steele was disciplined by her employer in violation of Connecticut state law because she exercised her First Amendment right to express opinions with which ESPN and Disney do not agree.

47. Given ESPN’s unconscionable treatment, Steele lodged a formal complaint with ESPN’s Human Resources department in February 2022, putting Defendants on notice of their blatant violations of Steele’s constitutional rights and of Connecticut state law. Steele’s attorneys followed up with a letter asserting Steele’s rights.

48. Notably, Steele’s first request was for an apology from Defendants. Defendants deprived Steele of her constitutional rights, punished her by sidelining her and taking away assignments (publicly admitting as much through executive vice president Laura Gentile’s comments at the ESPNW conference and recreating a firestorm weeks after Steele’s suspension). Defendants forced Steele to apologize, allowed media to destroy her, and let media reports that she had been suspended go unchallenged, and allowed Steele’s colleagues to defame her in violation of company policy without so much as a reprimand. Defendants did all this while they let other employees express opinions critical of Defendants without any repercussions or even a negative comment by Defendants. After complaining to human resources and hiring counsel to write a letter concerning the violation of her rights, all Steele wanted at the time was for Defendants to correct the damage done by apologizing to her. Instead of agreeing to do so, Defendants ignored Steele’s request for an apology and instead continued to gaslight her.

49. Tellingly, Steele had been taken off *all* hosting assignments for major events since the podcast with her interview was published in September 2021—until Defendants received Steele’s

human resources complaint and her attorneys' letter detailing Defendants' violations of Steele's constitutional and statutory rights. After they received the complaint and the letter, Defendants suddenly offered Steele the opportunity to co-host ESPN's coverage of The Masters Tournament, in a blatant admission of their culpability and prior misconduct and in an attempt to cover up their violation of her rights and to avoid liability.

50. Also tellingly, ESPN had a booster requirement for all employees covering on-site events. Although the CDC, Augusta National Golf Club and the PGA Tour were not mandating a booster, ESPN insisted on enforcing the policy which put Steele in the untenable position of either getting the booster or not being able to work the first assignment she was given after all the others had been taken away. After multiple correspondences, ESPN failed to respond to Steele's attorney, who had been writing to clarify the policy. Having no choice but to get the booster in order to provide proof by March 21, 2022 (since the company's policy required inoculations two weeks prior to the start of the event to be considered fully boosted), Steele complied with ESPN's policy under duress so she could work the assignment. Exactly two days later on March 23, 2022, in another admission of guilt by ESPN, Steele was given a one-time exemption to the booster mandate despite the fact that the deadline had already passed and Steele had filed the necessary paperwork to prove she received the booster.

51. Furthermore, Steele's human resources complaint and attorney letter both raised the issue of repeated social media attacks on Steele by her ESPN colleagues. Defendants attempted to remedy her claims, in another admission they had violated their own policies and Steele's rights.

D. ESPN and Disney's Conduct Violates State Law

52. On or about November 1, 2013, Steele and ESPN entered into an Employment Agreement (the "Agreement"), as subsequently amended on October 1, 2016, and April 25, 2017. The Agreement states that it "shall be construed according to the laws of the State of Connecticut." By entering into the Agreement, Steele became Defendants' employee.

53. Pursuant to General Statutes § 31-51q, Connecticut law holds employers liable for "disciplining or discharging" any employee as a result of that employee's exercise of his or her right of free speech as protected under the federal and state constitutions.

54. Steele's comments during the podcast interview addressed matters of public concern and were accordingly protected by both the First Amendment to the United States Constitution and Article First, Section 4 of the Connecticut Constitution.

55. ESPN and Disney took adverse actions against Steele in the nature of discipline and/or discharge as a result of her exercise of her right to free speech under the state and federal constitutions. Steele was suspended from on-air appearances, forced to issue a humiliating public apology, taken off prime assignments, and subjected to bullying and harassment by colleagues while ESPN and Disney did nothing to stop it.

56. Steele's exercise of her right to free speech did not substantially or materially interfere with her bona fide job performance or with her working relationship with her employer. She appeared on the Jay Cutler podcast as a private citizen expressing her own views related to her own personal experiences; at no time did she purport to speak for her employer. Because she covers sports, not politics or world news, her expression of her personal views on vaccine mandates and racial identity could not possibly call into question her journalistic neutrality.

57. Steele has suffered significant damages as a direct and proximate result of ESPN and Disney's adverse actions against her. Her reputation and professional prospects have been damaged beyond repair, likely costing her professional opportunities for years if not decades in the future.

58. By this action, Steele seeks to recover not only the actual damages she has suffered as a result of ESPN and Disney's violation of Connecticut state law and her right to free expression, but also punitive damages and reasonable attorney's fees, as provided by statute.

COUNT TWO: Breach of Contract

59. Plaintiff restates and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1-58, above.

60. The employment Agreement between Steele on the one hand and ESPN and Disney on the other constitutes a valid and binding contract between the parties based upon sufficient legal consideration.

61. At all relevant times, Steele performed all the duties and obligations of the parties' Agreement.

62. By their conduct described above, including their failure to investigate properly the statements allegedly made by Steele, their failure to defend their employee from misleading media and social media attacks, their decision to illegally punish Steele for making constitutionally protected statements, and their pretextual reliance on a policy not applied to other employees, ESPN and Disney have breached one or more of the material terms of the parties' Agreement.

63. As a result of Defendants' breach, plaintiff has been denied the benefits of the contract and has suffered attendant damages, in the form of, inter alia, lost revenue and lost business opportunities.

COUNT THREE: Bad Faith Conduct, Breach of the Implied Covenant of Good Faith and Fair Dealing

64. Plaintiff restates and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1-63, above.

65. Steele was entitled to receive the benefits of the parties' agreement.

66. Defendants' conduct, including their failure to investigate properly the statements allegedly made by Steele, their failure to defend their employee from misleading media and social media attacks, their decision to illegally punish Steele for making constitutionally protected statements, and their pretextual reliance on a policy not applied to other employees, was engaged in without any reasonable basis and solely for the purpose of interfering with the rights and benefits of employment to which Steele was properly entitled.

67. Defendants knew, or recklessly disregarded, the fact that they had no reasonable basis to take the aforementioned actions with respect to Steele.

68. Steele suffered significant harm as a result of Defendants' conduct.

COUNT FOUR: Negligent Infliction of Emotional Distress

69. Plaintiff restates and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1-68, above.

70. Defendants' conduct as described above created an unreasonable risk of causing Steele emotional distress.

71. Emotional distress was a foreseeable result of Defendants' actions and failure to act,

as described, and Defendants knew or reasonably should have known that their conduct created an unreasonable risk of such distress.

72. Defendants' conduct caused Steele to suffer emotional distress.

73. Said distress was severe enough that it might result in illness or bodily harm.

COUNT FIVE: Intentional Infliction of Emotional Distress

74. Plaintiff restates and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1-73, above.

75. Defendants by their conduct intended to inflict emotional distress or knew or should have known that emotional distress was the likely result of their conduct.

76. Defendants' conduct, including penalizing Steele without conducting even the barest investigation into her statements, in failing and refusing to defend her from misleading media and social media attacks, and in relying on a pretextual "policy" which was not applied to other employees, was extreme and outrageous.

77. Defendants conduct as described was the proximate cause of severe emotional distress sustained by Steele.

COUNT SIX: Declaratory Relief

78. Plaintiff restates and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1-77, above

79. An actual controversy has arisen and now exists between Steele on the one hand and ESPN and Disney on the other. As described above, Steele alleges that ESPN and Disney have violated her rights as protected by Conn. Gen. Stat. § 31-51q. Upon information and belief, ESPN and Disney deny Steele's allegations and contend that their conduct has not violated Steele's rights as protected by Conn. Gen. Stat. § 31-51q.

80. Steele seeks a declaratory judgment from this Court that ESPN and Disney have violated Steele's rights as protected by Conn. Gen. Stat. § 31-51q.

WHEREFORE, Plaintiff seeks judgment in her favor against Defendants, and each of them, as follows:

1. Punitive damages pursuant to General Statutes § 31-51q;
2. Punitive damages under common law for reckless conduct;
3. Attorneys' fees under General Statutes § 31-51q;
4. Compensatory damages;
5. Declaring that Defendants have violated Plaintiff's rights under General Statutes § 31-51q; and
6. Such other and further relief as the court may deem just and proper.

Dated: April 27, 2022

By: 

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RETURN DATE: May 17, 2022

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SUPERIOR COURT

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J.D. OF HARTFORD

V.

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AT HARTFORD

ESPN PRODUCTIONS, INC. and

THE WALT DISNEY COMPANY

:

APRIL 27, 2022

STATEMENT OF AMOUNT IN DEMAND

The Plaintiff seeks damages, exclusive of interests and costs, in excess of Fifteen Thousand (\$15,000.00) Dollars, along with declaratory and other relief.

Dated at Hartford, Connecticut, this 27th day of April, 2022.

THE PLAINTIFF

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