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CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
JACQUELINE ANDERSON SMITH, CLERK

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
BIRMINGHAM DIVISION

BRITTANY REYNOLDS,	)	
	)	
Plaintiff,	)	
	)	**Case No:**
v.	)	
	)	**JURY DEMAND**
THE WATER WORKS BOARD OF THE CITY OF BIRMINGHAM, d/b/a BIRMINGHAM WATER WORKS & CENTRAL ALABAMA WATER and TIM HARRIS,	)	
	)	
Defendants.	)	

COMPLAINT

PARTIES

1. Brittany Reynolds (hereafter "Reynolds") is a female citizen over the age of nineteen (19) and is a resident of Jefferson County, Alabama.

2. Defendant, The Water Works Board of The City of Birmingham, d/b/a Birmingham Water Works and Central Alabama Water (hereafter "BWW/CAW"), is a public corporation incorporated and existing under Ala. Code §§ 11-50-230 *et seq*. BWW/CAW is principally located in Jefferson County, Alabama.

JURISDICTION AND VENUE

3. This Court has jurisdiction pursuant to the laws of the State of Alabama.

4. Venue is proper in this Court because the acts and omissions giving rise to this action occurred in Jefferson County, Alabama and the Defendants conduct business and operate within this jurisdiction.

5. Venue is proper under Alabama Code §§ 6-3-2 and 6-3-11.

FACTS

6. Reynolds is an African-American female who began working for BWW/CAW in January 2019.

7. Initially, Reynolds was hired for the role of "IV Helper." Prior to her tenure at BWW/CAW, she worked at the Bessemer Filter Plant for approximately nine years as a Level IV Operator.

8. Mr. Tim Harris ("Harris") (white male) is the manager over all 4 (four) plants at BWW/CAW. During a company trip to Anaheim, California on June 12, 2024, several coworkers were gathered in the hotel lobby. Harris approached Reynolds appearing intoxicated. Harris asked Reynolds to go to his hotel room with him. Reynolds kept saying he needed help taking 3 (three) collared shirts to his room. Reynolds declined his invitation twice. Harris

continued asking Reynolds, stating he needed help because he was drunk and that his room was right off the elevator.

9. Eventually, Reynolds agreed to walk upstairs with Harris. When he opened the door to his room, Reynolds remained outside. Harris begged Reynolds to step in his hotel room to "see how nice the room is." Reynolds stepped in briefly and looked around the bathroom area. As she was leaving the bathroom area, Harris was behind Reynolds, as they were walking out the door, he made the statement that he was "trying to get himself some pussy tonight." Offended and afraid, Reynolds did not respond and left his hotel to walk back to her hotel a couple of blocks away. Reynolds was immediately offended an embarrassed by his sexual advances.

10. In May 2025, during a Partnership for Safe Drinking Water meeting, Harris called Reynolds aside privately. He told her that she: was "so beautiful"; was "in the wrong field"; and "should be a model instead of working in water treatment."

11. In October 2025 while working at the Western Filter Plant during a filter rehabilitation project, Reynolds encountered Harris walking in the hallway. When she asked where he was going, he responded: "To the restroom. Do you want to help me?" Reynolds was immediately offended an embarrassed by his sexual remark.

CLAIMS

COUNT I
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
TORT OF OUTRAGE

12. By this reference Reynolds reiterates and incorporates all allegations set forth in preceding paragraphs, as if fully set forth herein.

13. Harris intended to cause Reynolds emotional distress or he should have known that his conduct was likely to cause Reynolds emotional distress.

14. Harris' conduct was extreme and outrageous to a degree that goes beyond all bounds of decency. It is atrocious and intolerable in a civilized society.

15. Harris' intentional or reckless conduct caused Reynolds emotional distress.

16. Harris' emotional distress was so severe that no reasonable person could be expected to endure it.

17. As a proximate cause of BWW/CAW's and Harris' actions, Reynolds has suffered lost wages and benefits, emotional pain, mental anguish, mental and physical injury, stress, shame, humiliation, anxiety, and other damages.

COUNT II
ASSAULT

18. By this reference Reynolds reiterates and incorporates all allegations set forth in preceding paragraphs, as if fully set forth herein.

19. Harris stood behind Reynolds uttering the disgusting phrase that "I'm trying to get some pussy tonight."

20. Reynolds suffered reasonable apprehension of imminent and grotesque, willful, and intentional contact by Harris.

21. Harris had the ability to carry out the threat of touching Reynolds.

22. Reynolds had a well-founded fear that Harris would immediately carry out the threat.

23. As a proximate cause of BWW/CAW's and Harris' actions, Reynolds has suffered lost wages and benefits, emotional pain, mental anguish, mental and physical injury, stress, shame, humiliation, anxiety, and other damages.

COUNT III
INVASION OF PRIVACY

24. By this reference Reynolds reiterates and incorporates all allegations set forth in preceding paragraphs, as if fully set forth herein.

25. Harris wrongfully intruded into Reynolds' private activities, personal space, and physical solitude or seclusion in such a manner that was improper or offensive.

26. The intrusion would outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

27. This intrusion caused Reynolds harm.

28. As a proximate cause of BWW/CAW's and Harris' actions, Reynolds has suffered lost wages and benefits, emotional pain, mental anguish, mental and physical injury, stress, shame, humiliation, anxiety, and other damages.

COUNT IV
SECTION 1983 SEXUAL HARASSMENT HOSTILE WORK ENVIRONMENT – TIM HARRIS (INDIVIDUALLY)

29. By this reference Reynolds reiterates and incorporates all allegations set forth in preceding paragraphs, as if fully set forth herein.

30. Reynolds was harassed because of her sex.

31. Harris intentionally committed acts that created a hostile work environment for Reynolds personally.

32. Harris had supervisory authority over Reynolds in the terms and conditions of her employment.

33. Harris' actions were under color of state law.

34. Reynolds suffered damages because of the hostile work environment.

35. Harris' subjected Reynolds to sexually offensive statements.

36. Reynolds did not welcome the sexually offensive statements.

37. As a proximate cause of Harris' actions, Reynolds has suffered lost wages and benefits, emotional pain, mental anguish, mental and physical injury, stress, shame, humiliation, anxiety, and other damages.

COUNT V

SEXUAL HARASSMENT
HOSTILE WORK ENVIRONMENT CLAIM – BWW/CAW

38. By this reference Reynolds reiterates and incorporates all allegations set forth in preceding paragraphs, as if fully set forth herein.

39. Reynolds was subjected to a hostile work environment because of her sex.

40. The hostile work environment was the result of a policy or custom of BWW/CAW.

41. Reynolds suffered damages because of the hostile work environment.

42. As a proximate cause of BWW/CAW's actions, Reynolds has suffered lost wages and benefits, emotional pain, mental anguish, mental and physical injury, stress, shame, humiliation, anxiety, and other damages.

PRAYER FOR RELIEF:

Plaintiff respectfully requests this Court:

a) Grant a permanent injunction enjoining Defendant, its officers, successors, assigns and all persons in active concert or participation with it, from

engaging further in its discriminatory treatment on the basis of sex;

b) Order Defendant to institute and carry out policies, practices and programs which provide equal provisions and employment opportunities for all employees, and which eradicate the effects of its past and present unlawful employment practices, including implementing policies against sexual harassment in the workplace;

c) Order BWW/CAW to make Reynolds whole by providing front pay, back pay, with prejudgment interest, back pay with prejudgment interest, in amounts to be proved at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices, including, but not limited to, compensatory damages, and liquidated damages;

d) Award Reynolds nominal, compensatory, and liquidated damages;

e) Award Reynolds her costs and expenses herein, including reasonable attorney fees; and,

f) Award such other and further relief which this Court deems necessary and proper.

JURY DEMAND

Reynolds demands a trial by struck jury.

/s/ Nicole D. Edwards
Nicole D. Edwards

State Bar Id No: ASB-4832-B19D

/s/ Blake C. Edwards
Blake C. Edwards
State Bar Id No: ASB-5200-T60B
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PLEASE SERVE DEFENDANTS BY PRIVATE PROCESS SERVER:

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