

STATE OF NEW YORK
SUPREME COURT MONROE COUNTY

PATRICIA MARTINEZ,

Plaintiff,

COMPLAINT

vs.

THE COUNTY OF MONROE, MONROE
COMMUNITY COLLEGE AND MONROE
COMMUNITY COLLEGE DIRECTOR OF
HUMAN RESOURCES SHERRY
RALSTON, in her Individual and Official
capacity,

Index No.

Defendants.

Plaintiff, Patricia Martinez, by her attorney, Jeffrey Wicks, PLLC, for her
Complaint against the defendants, alleges as follows:

INTRODUCTION

1. Plaintiff, Patricia Martinez is an individual who is presently employed by Monroe Community College (hereinafter "MCC"). Plaintiff has been employed at MCC since April 1994. She is also in a loving, long term, committed same sex relationship that has been solemnized in both a marriage in Ontario, Canada and a civil union in the State of Vermont. However, despite the legal status of her relationship with her partner and the language in her employment contract with MCC, MCC has refused to extend health care benefits to Plaintiff's partner.

2. Plaintiff demands equal protection under the law, pursuant to both the New York and United States constitutions, whereby she and her partner should lawfully receive the myriad of benefits, including spousal health benefits,