

EXHIBIT A

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

PROOF OF CLAIM Chapter 11

In Re: Kmart Corporation, et al. Case Numbers 02-02462 through 02-02499

Your claim is scheduled as follows: Class NOT SCHEDULED

Name of Debtor: (see attached for complete list of debtors) Kmart Corporation

Case Number:

NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (The person or other entity to whom the debtor owes money or property): BARTLETTE, ILEASE A PO BOX 7095 ST. THOMAS, VI 00801

Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. Check box if you have never received any notices from the bankruptcy court in this case. Check box if the address differs from the address on the envelope sent to you by the court.

Amount NOT SCHEDULED FILED UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS JUL 30 2001 KENNETH S. GARDNER, CLERK

If address differs from above, please complete the following: Creditor Name: Ilease A. Bartlette Telephone: # (340) 776-1577 Address: c/o Archie Jennings, Esq. P.O. Box 442 St. Thomas, VI 00804

Account or other number by which creditor identifies debtor:

Check here if this claim replaces or amends a previously filed claim, dated

1. Basis for Claim: Goods sold, Services performed, Money loaned, Personal injury/wrongful death, Taxes, Other

Retiree benefits as defined in 11 U.S.C. § 1114(a), Wages, salaries, and compensation (fill out below), Unpaid compensation for services performed from (date) to (date)

2. Date debt was incurred: N/A

3. If court judgment, date obtained:

4. Total Amount of Claim at Time Case Filed: \$ 45,000.00 Back pay and Front pay. If all or part of your claim is secured or entitled to priority, also complete Item 5 or 6 below.

5. Secured Claim: Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: Real Estate, Motor Vehicle, Other. Value of Collateral: \$ Amount of arrearage and other charges at time case filed included in secured claim, if any: \$

6. Unsecured Priority Claim: Check this box if you have an unsecured priority claim. Amount entitled to priority \$ Specify the priority of the claim: Wages, salaries, or commissions (up to \$4,650), earned within 90 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(3). Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(4). Up to \$ 2,100 of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(6). Alimony, maintenance, or support owed to a spouse, former spouse, or child - 11 U.S.C. § 507(a)(7). Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). Other - Specify applicable paragraph of 11 U.S.C. § 507(a)().

7. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim. 8. Supporting Documents: Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary. 9. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.

This Space is for Court Use Only P 45327 FILED UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS JUL 30 2001 KENNETH S. GARDNER, CLERK

Date: 7-18-02 Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any): Ilease A. Bartlette

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION		PROOF OF CLAIM Chapter 11
In Re Kmart Corporation et al.		Case Numbers 02-02462 through 02-02499
Name of Debtor: (see attached for complete list of debtors) Kmart Corporation		Your claim is scheduled as follows: Class NOT SCHEDULED
Case Number:		Amount NOT SCHEDULED
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		FILED UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS JUL 30 2001 KENNETH S. GARDNER, CLERK 117005135 This space is for Court Use Only
Name of Creditor (The person or other entity to whom the debtor owes money or property): 09 2709285 BARTLETTE, ILEASE A PO BOX 7095 ST. THOMAS, VI 00801		
If address differs from above, please complete the following: Creditor Name: Ileas A. Bartlette Address: c/o Archie Jennings, Esq. P.O. Box 442 City/ST/Zip: St. Thomas, VI 00804 Telephone: # (340) 776-1577		
Account or other number by which creditor identifies debtor:		<input type="checkbox"/> Check here if this claim <input type="checkbox"/> replaces a previously filed claim, dated _____ <input type="checkbox"/> amends
1. Basis for Claim <input type="checkbox"/> Goods sold <input type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input type="checkbox"/> Taxes <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input checked="" type="checkbox"/> Wages, salaries, and compensation (fill out below) Your SS #: 580-14-9292 Unpaid compensation for services performed from _____ to _____ (date) (date)
2. Date debt was incurred: N/A		3. If court judgment, date obtained:
4. Total Amount of Claim at Time Case Filed: \$ 45,000.00 Back pay and Front pay If all or part of your claim is secured or entitled to priority, also complete Item 5 or 6 below. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.		
5. Secured Claim. <input type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Value of Collateral: \$ _____ Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ _____		6. Unsecured Priority Claim. <input type="checkbox"/> Check this box if you have an unsecured priority claim. Amount entitled to priority \$ _____ Specify the priority of the claim: <input type="checkbox"/> Wages, salaries, or commissions (up to \$4,650), earned within 90 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(3). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Up to \$ 2,100 of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(6). <input type="checkbox"/> Alimony, maintenance, or support owed to a spouse, former spouse, or child - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____).
7. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.		This Space is for Court Use Only R 45327 FILED UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS JUL 30 2001 07/30/02 KENNETH S. GARDNER, CLERK BY _____
8. Supporting Documents: Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary.		
9. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.		
Date 7-18-02	Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any): Ileas A. Bartlette	

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

ILEASE BARTLETTE,

Plaintiff,

vs.

KMART CORPORATION,

Defendant.

CIVIL NO. 2002-100

ACTION FOR DAMAGES,
BREACH OF CONTRACT
DISCRIMINATION, AND WRONGFUL
DISCHARGE

JURY TRIAL DEMANDED

CLERK OF THE
DISTRICT COURT
ST. THOMAS

02 MAY 28 PM 10:06

RECEIVED

COMPLAINT

COMES NOW the Plaintiff, ILEASE BARTLETTE, and for her complaint against

Defendant states as follows:

1. This a civil action for damages to redress the deprivation of rights secured to Plaintiff by Title VII of the Civil Rights Act including Title 42 U.S.C section 2000e et seq. and section 12101 et seq., as well as those rights secured under 42 U.S.C. section 1981 for redress of a violation of an individual's civil rights and Title 29 U.S.C. 621 et seq. for age discrimination. Further, this action is for the contract and tort claims of the Plaintiff.

2. This Court has jurisdiction of this action pursuant to Title 28 U.S. Code section 1331 for all the federal violations of the federal laws, including but not limited to those involving civil rights action arising under the equal employment acts of the United States Codes and ancillary jurisdiction for all the contract, tort and violations of the Virgin Islands laws.

3. Plaintiff is a black female over the age of 40 with a mental disability. She

is a citizen of the United States and a citizen and resident of St. Thoms, U.S. Virgin Islands.

4. Plaintiff was employed by the Defendant, Kmart Corporation, at the time of her termination worked as a cashier.

5. Defendant upon information and belief is a corporation that was incorporated in the State of Michigan and that it operates on an interstate basis. Further, it is believed that it employs over more than 500 employees and operates its business through interstate commerce on a regular basis.

FACTUAL STATEMENT

6. The Plaintiff was at all times relevant to this complaint, an employee of the Defendant in St. Thomas, U.S. Virgin Islands, and was employed at the Tutu Mall location and performed various tasks throughout her tenure with the Defendant.

7. As an employee of said business, Plaintiff was acting in good faith and performed as well as she could in said positions and assignments given to her. Plaintiff was unable to perform under a new system related to her cashier position and was constantly harassed and was eventually discharged for reasons of non-performance of her duties and after she informed her employer that she was disabled and requested an accommodation by performing other job functions that she had previously performed other than her assigned job functions.

8. The Plaintiff was harassed and treated differently than specifically other

white employees and/or non-disabled persons employed by Defendant.

9. The Defendant was well aware and had been specifically informed of her mental disability, but took no actions to address the issue of accommodation raised by the Plaintiff or attempt to resolve the matter or issues.

10. Upon information and belief, the Plaintiff believes she was wrongfully discharged due to her color, age and disability.

11. The Plaintiff was discharged without any warning or reprimand for any poor job performance and she was discharged despite the fact that the Defendant was requested to accommodate her disability.

12. After her termination, the Plaintiff filed charges with the V.I. Department of Labor as the deferral agency for the Equal Employment Opportunity Commission and received a Right To Sue Letter from the Equal Employment Opportunity Commission.

13. Plaintiff states that Defendant's action were willful and intentional and done with the intention to deprive Plaintiff of her legal rights.

14. As the proximate result, the Plaintiff has been injured in loss of income and benefits and other economic damages as the result of the actions of the

Defendant

COUNT I

EMPLOYMENT DISCRIMINATION

15. Plaintiff restates and realleges paragraphs 1 through 14 of said complaint as if fully set forth herein.

16. The actions of Defendant in treating Plaintiff differently in terms, conditions and benefits than other white employees of equal stature and responsibility in violation of Title 42 U.S.C. Sections 2000e et seq.

17. As a proximate result of said actions of Defendant, the Plaintiff has suffered a loss of income, emotional distress, and humiliation which entitles her to actual, general, compensatory, and punitive damages all within the jurisdictional limits of this court.

COUNT II

VIOLATION OF AMERICAN WITH DISABILITIES ACT

18. Plaintiff restates and realleges paragraphs 1 through 17 of said complaint as if fully set forth herein.

19. The actions of Defendant in treating Plaintiff differently in terms, conditions and benefits than other non-disabled employees of equal stature and responsibility in violation of Title 42 U.S.C. Sections 12101 et seq.

20. As a proximate result of said actions of Defendant, the Plaintiff has suffered a loss of income, emotional distress, and humiliation which entitles her to actual, general, compensatory, and punitive damages all within the jurisdictional limits of this court.

COUNT III

VIOLATION OF CIVIL RIGHTS ACT

21. Plaintiff restates and incorporates the allegations set forth in 1 through 20

of this complaint as if fully set forth herein.

22. That the actions of Defendant are in violation of the laws under Title 42 U.S.C., Section 1981.

23. Defendant by and through their employees, agents, and/or representatives, have knowingly in pursuance of a common plan or design, through their conduct, deprived Plaintiff of her statutory and contractual rights as white persons are afforded; thereby substantially denying her rights to freedom of contract and equal protection under the law and her right to equal employment.

24. That as a result of Defendant's concerted and unlawful actions, Defendant has deprived Plaintiff of her right to equal protection of the laws and have impeded the due course of justice, in violation of the fifth and fourteenth amendments of the Constitution of the United States as applied to the Virgin Islands pursuant to 48 U.S.C., Section 1561 and Plaintiff has suffered damages as a result of said unlawful acts or omissions.

COUNT IV

VIOLATION OF THE AGE DISCRIMINATION ACT

25. Plaintiff restates and incorporates the allegations set forth in 1 through 24 of this complaint as if fully set forth herein.

26. That the actions of Defendant are in violation of the laws under Title 29 U.S.C., Section 621 et seq.

27. Defendant by and through their employees, agents, and/or representatives, have knowingly in pursuance of a common plan or design, through their conduct, deprived Plaintiff of her statutory and contractual rights as white persons are afforded; thereby substantially denying her rights to freedom of contract and equal protection under the law and her right to equal employment.

28. That as a result of Defendant's concerted and unlawful actions, Defendant has deprived Plaintiff of her right to equal protection of the laws in violation of the laws that protect those who are treated differently in employment due to her age and as a proximate result the Plaintiff has been damaged thereby.

COUNT V

BREACH OF CONTRACT AND THE COVENANTS OF GOOD FAITH AND FAIR DEALING IN EMPLOYMENT

29. Plaintiff restates and realleges the paragraphs 1 through 28 of said complaint as if fully set forth herein.

30. The actions of Defendant is clearly a breach of the covenant of good faith and fair dealing, as well as a breach of the handbook obligations that form the basis of a contract between the Plaintiff and the employer, under which the Plaintiff is direct party of said agreement.

31. The Plaintiff should receive all contract damages and losses including, but not limited to consequential damages for breach of the contract by Defendant.

COUNT VI

WRONGFUL DISCHARGE

32. Plaintiff hereby restates and reallages paragraph 1 through 31 above as if fully set forth herein.

33. The action of Defendant was in direct contravention to the laws of the Virgin Islands relative to the basis for a discharge under law and has subjected Plaintiff to an unlawful discharge as determined by law.

34. The actions of Defendant, were outrageous, malicious, reckless and done with evil motive and/or without any regard for rights of the Plaintiff.

35. By reason of the allegations set forth above and the outrageous nature of Plaintiff's conduct due to the Defendant's willful violation of the statute and law of the Virgin Islands, punitive damages should be imposed to defer the Defendant from such actions in the future.

COUNT VII

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

36. Plaintiff hereby restates and reallages paragraph 1 through 35 above as if fully set forth herein.

37. The actions of Defendant was reckless and in total disregard of the federal laws and the laws of the Virgin Islands relative to the basis for a discharge under law and has subjected Plaintiff to emotional distress as a result thereby.

38. As the result of said actions of Defendant, the Plaintiff has been injured thereby, and the acts and conduct of the Defendant were outrageous, malicious, reckless and done with evil motive and/or without any regard for rights of the Plaintiff.

39. By reason of the allegations set forth above and the reckless and outrageous nature of Plaintiff's conduct due to the Defendant's willful violation of the statutes and laws of the Virgin Islands, punitive damages should be imposed to deter the Defendant from such actions in the future.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

A. That this Court declare the actions Defendant engaged in were unlawful employment practices.

B. That this court enjoin Defendant from continuing to engage in said unlawful employment practices against Plaintiff and place her in her proper position as her white counterpart or persons without a disability would have been placed for the same or similar position

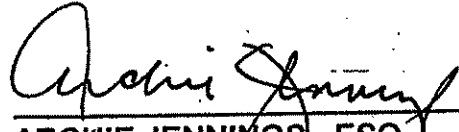
C. Award Plaintiff her actual and compensatory damages for loss of wages and other compensatory damages for the injuries suffered by Plaintiff.

D. Award Plaintiff punitive damages within the jurisdictional limits of the federal statute and within the limits of this court.

E. That the Defendant be ordered to pay reasonable attorney's fees in accordance with Title 42 U.S.C. Section 1988.

F. That the Court grant such further and other relief as this court may deem just and proper.

DATED: 5/28/22


ARCHIE JENNINGS, ESQ.
Attorney for Plaintiff
P.O. Box 442
St. Thomas, VI 00804
Telephone: (340) 776-1577

JURY TRIAL DEMANDED

Pursuant to Rule 38 (b) Federal Rules of Civil Procedure, Plaintiff hereby requests trial by jury of all issues triable by jury.


ARCHIE JENNINGS, ESQ.

Dk22/lease comp

VERIFICATION

TERRITORY OF THE VIRGIN ISLANDS)
DIVISION OF ST. THOMAS & ST. JOHN) ss:

I, ILEASE BARTLETTE, have read the foregoing Complaint and state that the matters set forth herein are true and accurate to the best of my recollection and knowledge.

Ileasant Bartlette

ILEASE BARTLETTE

SWORN AND SUBSCRIBED before me this 28th day of MAY, 2002.

Archie Jones

NOTARY PUBLIC

MY COMMISSION EXPIRES:
December 21, 2002
LNP-07-99