

WRITING SAMPLE: FICTITIOUS MATTER. Prepared by Dwight Bernard as a writing sample.
All names, entities, and facts are invented; no client, case, or court filing is involved.

RECORD CHRONOLOGY AND SOURCE MAP

Jordan Ellison v. Kestrel Point Freight Services, Inc., et al.: draft complaint, factual allegations
 (§§ 14–30)

Prepared for [Supervising Attorney], [Firm] · September 2026

How to read this map

Each factual paragraph of the draft complaint is tied to what supports it. The Ellison packet (ELLISON 0001–0013) is a fictional source packet written for this sample. It stands in for the documents a client would send; no real document is reproduced. The “Support” column uses four labels, so the reviewing attorney can see at a glance what rests on paper and what does not:

- **Document:** the proposition appears on the face of a packet document.
- **Client:** her own account (intake interview, April 15, 2026, or her answers since); no document yet.
- **Belief:** pleaded on information and belief; the basis is noted.
- **Open:** something in the record does not yet line up; see the open items at the end.

Source map: complaint §§ 14–30

¶	Proposition	Support	Source and pin	Note
14	Hired Mar 4, 2024; promoted Jan 6, 2025	Client	Interview	Title confirmed at ELLISON 0001; dates are hers. Offer letter and promotion notice requested Apr 16; not received.
15	Duties at a seated console with a chair	Client	Interview	Matches the duties at 0010; the chair is her account.
16	Posted duties; no lifting listed; warehouse staff handle freight	Document / Belief	ELLISON 0010–0011; 0013	Quoted duties appear at 0010. Freight handling by warehouse staff is pleaded on belief.
17	Dec 12, 2025 review, “Exceeds Expectations”; no prior discipline	Document / Client	ELLISON 0001	No discipline before Mar 6 is her account; personnel file not yet obtained.
18	Told Marsh of pregnancy, Feb 10, 2026	Client	Interview	Oral.
19	Feb 17 email to Whitcomb with obstetrician’s note; three restrictions	Document / Open	ELLISON 0004; 0005	See Open item 1.
21	Marsh remark, Feb 19, before a coworker	Client	Interview	Coworker not yet named. Wording is from her same-day notes app entry, not yet produced.
22	Whitcomb: “the only available accommodation is unpaid leave”	Document	ELLISON 0006	Quoted in full.
23	No one asked about limits or offered alternatives	Document / Client	ELLISON 0006; Interview	0006 offers nothing else; that no conversation took place is her account.
25	Feb 24 written complaint; renewed requests	Document	ELLISON 0007	

¶	Proposition	Support	Source and pin	Note
26	No response	Client	Interview	Her inbox search for any reply was requested; not yet confirmed.
27	Mar 6 warning for “attendance,” citing approved Mar 2 appointment	Document / Open	ELLISON 0009; 0008	See Open item 2.
28	Terminated Mar 20; told “restructuring”	Client	Interview	No termination letter in the packet.
29	Apr 13 posting for Senior Dispatcher, same duties	Document	ELLISON 0010–0011	Saved by her that day.
30	No other dispatch position eliminated	Belief	Interview	Basis: she knows of no other dispatcher let go. Not otherwise supported.

Paragraphs 20 and 24 apply the law to these facts and carry no record pin. Paragraphs 31 and 32 (intent and damages) are listed in the open items.

Chronology

Date	Event	Record	Complaint ¶
Mar 4, 2024	Hired as Dispatch Coordinator	Interview	14
Jan 6, 2025	Promoted to Senior Dispatcher	Interview; 0001	14
Dec 12, 2025	Review: “Exceeds Expectations”	0001–0003	17
Feb 10, 2026	Tells Marsh she is pregnant	Interview	18
Feb 17, 2026	Emails Whitcomb the obstetrician’s note	0004; 0005	19
Feb 19, 2026	Marsh remark in the dispatch office	Interview	21
Feb 20, 2026	Whitcomb: unpaid leave only	0006	22
Feb 24, 2026	Written complaint to Whitcomb	0007	25
Mar 2, 2026	Prenatal appointment (approved request)	0008	27
Mar 6, 2026	First written warning, “attendance”	0009	27
Mar 20, 2026	Termination; “restructuring”	Interview	28
Apr 13, 2026	Senior Dispatcher opening posted	0010–0011	29
Apr 30, 2026	Charge filed, dual-filed with the State Division	Charge as filed	6
Sep 8, 2026	Notice of Right to Sue issued	Notice	7
Sep 10, 2026	Notice received	Client	7; see Open item 4

Open items for the reviewing attorney

- ¶ 19, the note. The packet copy of the obstetrician’s note (0005) is undated and was received apart from the email (0004). Nothing in the packet yet ties the two together. Requested: the original Feb 17 email with its attachment.
- ¶ 27, the approval. The warning (0009) treats March 2 as an attendance problem. The leave-system screenshot (0008) shows the request “Approved”, but it carries no capture date, so it does not show the status on March 6. Requested: a dated approval record. This is the one item where the papers point in different directions; it is unresolved.
- ¶ 31, intent. Pleaded from the sequence of dates; no document speaks to it.
- ¶¶ 7 and 32, receipt and damages. The Sep 10 receipt date is her account; the portal or envelope date is not in the file. No pay or benefits records are in the packet yet, so ¶ 32 rests on her account.