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PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- Lost-pay figures are not computed. The Harlow incentive plan pays 8% of base salary, and client's Millbrook payment was $7,392.00 (8% of $92,400), but the Harlow amount owed is left as a placeholder. Confirm it, and the dollar value of the 0% vs. 3.5% merit difference, before any total is entered.
- The Harlow actual completion date is not in the records (only "projected completion December 19, 2025"). Confirm the project was completed with Mr. Draper as lead on that date.
- Client's Harlow role: Mr. Lusk's July 29 message told her to "sit out the Harlow bridge kickoff," but she stayed Project Lead until the September 29 reassignment, and the May 30 check-in already says Harlow was "ahead of schedule under her lead." Confirm what the "kickoff" was and the sequence with client.
- Confirm client's current title, pay, and reporting line after September 29, 2025. The records show no change in base pay, and the records do not state her current position.
- The base salary is shown as effective January 1, 2025, five days before the January 6, 2025 hire date. Confirm the figure.
- The June 19, July 8, and July 24 incidents come from client's own concern form. The closing letter does not say whether the chat messages were reviewed or which two other employees were interviewed.
- The letter cites Mr. Draper's $6,480.00 incentive from the payroll record. Decide whether to use this comparator pay information.
- Confirm whether Cumberline is represented by counsel, and whether any EEOC or state agency charge has been filed. Charge deadlines may be running ([VERIFY] in Legal basis).
- Confirm the requested corrective action: which lead role is to be restored, and whether to seek revision of the January 16, 2026 review and the 2026 merit increase. The firm notes mention only the lead role, bonus, supervisor, and lost pay.
- No health or emotional-distress records were provided, so none are included. Demand amount, deadline, date, delivery method, and addresses are placeholders.

Whitlock Barrow PLLC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

Paula Greer
Vice President of Human Resources
Cumberline Fabrication Inc.
4100 Foundry Ridge Road
Harlow Springs, Alabama [ADD: ZIP]

Re: Renee Castillo – Sex-Based Comments, Removal from Lead Role, and Retaliation; Reference No. [ADD: reference number]; Dates of conduct June 19, 2025 through January 16, 2026

Dear Ms. Greer:

Introduction

We represent Renee Castillo, who has worked for Cumberline Fabrication Inc. ("Cumberline") since January 6, 2025, as a Project Engineer in the Structural Division [performance_and_pay_records.pdf p.1; firm notes]. This letter concerns comments about our client's gender by her direct supervisor, Engineering Manager Wade Lusk, her removal from lead assignments, and the loss of her Project Lead role and incentive after she reported these concerns to Human Resources.

Employment background

Ms. Castillo was hired on January 6, 2025, as a Project Engineer in the Structural Division, with a base salary of $92,400 per year [performance_and_pay_records.pdf p.1]. Under the 2025 Project Lead Incentive Plan, engineers serving as Project Lead on the project completion date receive an incentive equal to 8% of base salary for each qualifying project [performance_and_pay_records.pdf p.1]. Cumberline paid Ms. Castillo $7,392.00 for the Millbrook Pedestrian Span project on June 27, 2025 [performance_and_pay_records.pdf p.1].

Mr. Lusk wrote her mid-year check-in dated May 30, 2025. It rated her "Exceeds Expectations" and states: "Renee is the most reliable lead on the team. Clients ask for her by name. Millbrook came in under budget and Harlow is ahead of schedule under her lead." [performance_and_pay_records.pdf p.1]

The conduct

Ms. Castillo's employee concern form of August 11, 2025, describes comments beginning in June 2025, and the chat excerpts she saved are in the record. The incidents are as follows.

Date	Incident	Who	Source
June 19, 2025	In the weekly project meeting, said "let the guys handle the client call, they like	Wade Lusk	hr_complaint_and_messages.pdf p.1

Date	Incident	Who	Source
	hearing from someone who sounds in charge."		
July 8, 2025	In front of Marcus Bell and Ana Reyes, told our client she should "smile more on site walks."	Wade Lusk; witnesses Marcus Bell, Ana Reyes	hr_complaint_and_messages.pdf p.1
July 24, 2025	Reassigned our client's client presentation to Kyle Draper, who joined the team in May, and told her "it's a tough crowd, not really a room for a woman." Our client asked him to stop.	Wade Lusk	hr_complaint_and_messages.pdf p.1
July 29, 2025, 9:14 a.m.	Wrote to our client: "Need you to sit out the Harlow bridge kickoff. Kyle will lead. Clients there are old school, they want a man running the job."	Wade Lusk	hr_complaint_and_messages.pdf p.1
July 29, 2025, 9:20 a.m.	Our client replied: "I have led every phase of Harlow so far. Please do not take me off it for that reason."	Renee Castillo	hr_complaint_and_messages.pdf p.1
August 5, 2025, 3:41 p.m.	In the "Structural Team" group channel, wrote: "Renee, maybe let one of the guys double check your load calcs before they go out."	Wade Lusk	hr_complaint_and_messages.pdf p.1
August 5, 2025, 3:47 p.m.	Direct message to our client: "That was out of line. Nobody else gets their calcs checked like that."	Marcus Bell	hr_complaint_and_messages.pdf p.1

Section 3.4 of Cumberline's Employee Handbook prohibits harassment or discrimination based on sex and other protected characteristics, directs employees to report concerns to Human Resources, and prohibits retaliation against anyone who reports a concern in good faith [hr_complaint_and_messages.pdf p.1].

Complaints and the employer's response

- **August 11, 2025.** Ms. Castillo submitted an Employee Concern Form at 4:52 p.m. naming Mr. Lusk and identifying Mr. Bell and Ms. Reyes as witnesses [hr_complaint_and_messages.pdf p.1].
- **September 12, 2025.** You wrote that Human Resources had interviewed Ms. Castillo, Mr. Lusk, and two other members of the Structural Team. Mr. Lusk stated that his comments were "meant as coaching" and that project assignments are based on client needs. The letter states that witnesses "gave differing accounts of the July 8 site walk," that Cumberline was "unable to substantiate a violation of Section 3.4," that the matter was closed, and that Mr. Lusk "has been reminded of the policy." [investigation_and_reassignment.pdf p.1]
- **September 26, 2025.** Fourteen days after the closing letter, Mr. Lusk issued an Assignment Change Notice. Effective September 29, 2025, Ms. Castillo was reassigned from Project

Lead, Harlow Bridge Retrofit, to Support Engineer, Drafting and Detailing, and Mr. Draper became Project Lead. The notice states that she would not be eligible for the Harlow Bridge Retrofit incentive because it applies only to engineers in a lead role on the project completion date. The reason given was "Realignment of team resources to client expectations." [investigation_and_reassignment.pdf p.1]

- **September 29, 2025.** At 8:03 a.m., Ms. Castillo emailed you that she had been taken off Harlow and lost the lead incentive after her complaint was closed, stated her belief that this was retaliation for her report, and asked for a review [investigation_and_reassignment.pdf p.1].
- **October 9, 2025.** You responded: "Assignment decisions are within management's discretion. We consider the matter closed." [investigation_and_reassignment.pdf p.1] The response in our file does not describe any review of the retaliation concern.

We note that the stated reason for the reassignment refers to "client expectations." On July 29, 2025, the same manager had written to our client that "Clients there are old school, they want a man running the job" [hr_complaint_and_messages.pdf p.1; investigation_and_reassignment.pdf p.1].

Effect on our client

Ms. Castillo remains employed at Cumberline [firm notes]. The records show the following job actions and pay effects.

- Removal from the Project Lead role on Harlow Bridge Retrofit, effective September 29, 2025, and reassignment to Support Engineer, Drafting and Detailing [investigation_and_reassignment.pdf p.1].
- Payroll records for the Harlow Bridge Retrofit incentive, paid December 31, 2025, show $6,480.00 to Kyle Draper as Project Lead and $0.00 to Ms. Castillo [performance_and_pay_records.pdf p.1].
- Mr. Lusk signed her 2025 annual review on January 16, 2026. It rates her "Meets Some Expectations," with the comment "Needs to build stronger client presence," compared with "Exceeds Expectations" on May 30, 2025. Her 2026 merit increase is 0%, against a team average of 3.5% shown on the summary [performance_and_pay_records.pdf p.1].

Item	Period	Amount	Source
Harlow Bridge Retrofit Project Lead Incentive (8% of base salary per qualifying project; base salary $92,400)	Paid December 31, 2025	$0.00 paid to our client; amount owed [ADD: Harlow incentive amount]	performance_and_pay_records.pdf p.1
2026 merit increase (0% received; team average 3.5%)	2026	[ADD: dollar value of merit increase difference]	performance_and_pay_records.pdf p.1

Total: [ADD: total lost pay, once the amounts above are confirmed]

Legal basis

Federal and Alabama laws prohibiting sex-based discrimination and harassment, and retaliation for reporting them, may apply to these facts [VERIFY: applicable federal and Alabama anti-discrimination and anti-retaliation laws]. Cumberline's own Handbook, Section 3.4, likewise prohibits discrimination based on sex and retaliation against anyone who reports a concern in good faith [hr_complaint_and_messages.pdf p.1].

[VERIFY: Alabama and federal agency charge deadlines and prerequisites (for example a charge with the EEOC or the state agency)]

Demand

On behalf of Ms. Castillo, we demand that Cumberline:

- Stop all comments and actions directed at our client based on her sex, including removing her from assignments because of client preferences about gender.
- Take corrective action, including restoring our client to a Project Lead role and restoring the Project Lead incentive [firm notes], and keeping Mr. Lusk out of her reporting line [firm notes] [ADD: specific corrective action requested, including which lead role is to be restored and whether the 2025 annual review and 2026 merit increase are to be revised].
- Refrain from any retaliation against our client for her reports or for this demand.
- Compensate our client for lost pay [firm notes] and pay [ADD: demand amount].
- Respond in writing by [ADD: response deadline].

We also ask that Cumberline preserve all records related to these matters, including the August 11, 2025 concern form and the investigation file; team workspace and chat messages involving Mr. Lusk, Mr. Bell, Ms. Reyes, Mr. Draper, and our client; the Harlow Bridge Retrofit assignment and incentive records; the 2025 Project Lead Incentive Plan and payroll records; and all performance reviews and merit increase records for the Structural Team.

Sincerely,

Renata S. Whitlock
Whitlock Barrow PLLC