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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

HALEY LENNER,

Plaintiff,

v.

OUTDOORSY, INC.; and **DOES** 1 through 20, inclusive,

Defendants.

CASE NO.: 25CU011882N

Unlimited Jurisdiction

COMPLAINT FOR:

1) **FEHA Gender/Sex Discrimination**
2) **FEHA Retaliation**
3) **Failure to Prevent Discrimination and Retaliation**
4) **Wrongful Termination in Violation of Public Policy**

JURY TRIAL DEMANDED

Plaintiff **HALEY LENNER** brings this action, by and through counsel, for damages against Defendant **OUTDOORSY, INC.** and **DOES** 1 through 20, inclusive (collectively, "Outdoorsy" or "Defendants"), and each of them. Plaintiff hereby complains of Defendants, and/or each of them, named hereinabove as follows:

JURISDICTION AND VENUE

1. Jurisdiction is proper because Ms. Lenner worked for Outdoorsy in the State of California, County of San Diego, and Defendants committed unlawful conduct, including the wrongful termination, in the State of California, County of San Diego. Significant relief is being sought against Defendants whose violations of California employment laws form a significant basis for Ms. Lenner's claims.

2. Venue is proper because Ms. Lenner primarily performed work for Defendants in the County of San Diego and a substantial portion of the transactions and occurrences related to this action occurred in this County, including, without limitation, the wrongful discharge of Ms. Lenner. Civ. Proc. Code § 395. Had the unlawful conduct, including the wrongful termination, not occurred, Ms. Lenner would still be working for Outdoorsy in the County of San Deigo.

3. Prior to the filing of this action, Ms. Lenner exhausted her administrative remedies. She filed her complaint with the California Civil Rights Department ("CRD") alleging that the acts of Defendants constituted multiple violations of California's Fair Employment and Housing Act ("FEHA"), among other things, and obtained a "right to sue" letter from CRD against Defendants on or around March 3, 2025. She subsequently brought this action on a timely basis.

PARTIES

4. Plaintiff **HALEY LENNER** is a natural person who is a resident of San Deigo County.

5. Ms. Lenner is informed and believes, and thereon alleges, that Defendant **OUTDOORSY, INC.** (Outdoorsy) is, and at all times relevant to this claim, was, an out of

state corporation formed in Delaware, with its registered principal address of 1801 E Cesar Chavez Street, Austin, Texas 78702.

6. Ms. Lenner is informed and believes that Outdoorsy does business in California, including by, among other things, hiring Ms. Lenner in California.

7. Outdoorsy is a platform for outdoor travelers to rent RVs.

8. The true names and capacities, whether individual, corporate, associate or otherwise of Defendants DOES 1 through DOES 20, inclusive, are unknown to Ms. Lenner who therefore sues said Defendants by such fictious names pursuant to Code of Civil Procedure section 474. Ms. Lenner further alleges that each of said fictitious Defendants are in some manner responsible for the acts and occurrences hereinafter set forth. Ms. Lenner will amend this Complaint to show their true names and capacities when the same are ascertained, as well as the manner in which each fictitious Defendant is responsible.

FACTS

9. Ms. Lenner began her employment with Outdoorsy on or about May 10, 2021, initially based remotely in Chicago and then Miami before transitioning to remote work from San Diego, California.

10. During her tenure, she was promoted from Senior Product Manager to Lead Product Manager, reflecting her strong performance and contributions to Outdoorsy's success.

11. Ms. Lenner was also given a $12,000 raise just eight or nine months ago in recognition of her exceptional performance and value to Outdoorsy.

12. Ms. Lenner played a critical role in launching key initiatives, including the Outdoorsy Destination Campground Network (ODN) and the multi-booking product experience at Outdoorsy's campgrounds, which paved the way for Outdoorsy to enter a completely new business vertical.

13. Ms. Lenner worked very well with her colleagues and was generally known by her coworkers an effective communicator who successfully managed projects.

14. Outdoorsy's executive team is overwhelmingly male, with only one woman excluding the co-founder and Chief Marketing Officer, Jen Young, in all of the leadership positions.

15. There are zero full time female employees in the entire engineering and product design organizations.

16. Outdoorsy fostered a male dominated culture, where male traits were favored by all—including, primarily, Ms. Young.

17. Despite her exemplary work, Ms. Lenner experienced gender-based discrimination and disparate treatment compared to her male colleagues, particularly Willy Volk and Michael Haan.

18. She was held to higher and different standards than these male counterparts in similar roles and received unfair criticism regarding her communication style.

19. For example, Ms. Young expressed that Ms. Lenner was "uptalking," a biased and gendered critique not leveled against any male colleagues who routinely pushed back on managers.

20. Ms. Young spoke to Ms. Lenner in a different and hostile manner, to the point that it was noticed by her colleagues.

21. These colleagues, including without limitation, Chandler Livingston, Mr. Volk, and Richard Dyer, would message Ms. Lenner after meetings and apologize on behalf of Ms. Young.

22. Men were never treated this way. In fact, Mr. Livingston even spoke with Ms. Young on the phone and let her know that the way in which she talked to Ms. Lenner was inappropriate.

23. Another employee, Mr. Tran, told Ms. Lenner via Slack that he was there to help her concerning Ms. Young's unfair treatment.

24. Ms. Lenner's direct supervisor, Han Yuan, was aware of Ms. Young's disparate and discriminatory treatment of Ms. Lenner.

25. Mr. Yuan and Ms. Lenner spoke about it often.

26. Mr. Yuan confided in Ms. Lenner and others in the engineering and product design organizations that he believed that Ms. Young was biased against females.

27. Mr. Yuan even asked Mr. Lenner to install the "Confide" app so that the two could use encrypted messages that disappear to avoid Ms. Young from seeing their communications.

28. Mr. Yuan told Ms. Lenner that he had a conversation with Ms. Young about her issue concerning Ms. Lenner's purported "uptalking."

29. Mr. Yuan told Ms. Young how that perspective was rooted in gender bias.

30. Ms. Young was not receptive to the feedback.

31. Multiple other employees also noticed Ms. Young's overt sexism.

32. In fact, Mr. Dyer, Director of Engineering, even sent Ms. Lenner a text stating that "*there legit feels like some weird underlying sexism with Jen.*"

33. He went on to explain that Ms. Young is "*chummy and buddy buddy*" with him, but "*it's not the same I see her interacting with [Ms. Lenner], Victoria, or Jamie.*"

34. In another text: "*I def think Jen doesn't like females.*"

35. In third: "*Jen is one of those women who doesn't like pretty girls and is intimidated by them.*"

36. Other employees, such Kellie Jue, were in agreement.

37. Rich Ancy, Mr. Yuan, and Mr. Dyer were all aware that there were zero women in their entire department.

38. They discussed it with Ms. Young via Slack, but she disregarded their concerns.

39. On or about October 9, 2024, Ms. Lenner finally had the courage to report the gender/sex discrimination to Mr. Carter, Vice President of Talent and Outdoorsy's primary HR representative.

40. Ms. Lenner let Mr. Yuan know that she was making the complaint as well.

41. Mr. Carter and Ms. Lenner had a video meeting to discuss her concerns.

42. Ms. Lenner detailed her experiences of being subjected to hostility and disparate treatment based on her female gender at the hands of Ms. Young.

43. She also reported sexism in the employee feedback survey which was submitted that same week.

44. Mr. Carter failed to take adequate remedial action to address the discrimination.

45. He removed Ms. Young and Ms. Lenner's one on one meetings from the calendar, which appears to be an admission of the discrimination existing.

46. Nonetheless, Ms. Young called Ms. Lenner three times within the same week to meet.

47. She had never, not once, called Ms. Lenner's cell phone before in the three years Ms. Lenner worked at Outdoorsy.

48. Clearly, she was on a damage control mission.

49. Once Ms. Young became of aware of the complaint, she decided that Ms. Lenner would have to be terminated to prevent her from further speaking out.

50. HR took no concrete steps to actually address the underlying discrimination. There was no training or discipline.

51. After filing her complaint, Ms. Lenner faced escalating retaliation that culminated in her termination.

52. First, by not having one on ones with Ms. Young, Ms. Lenner was excluded from important work issues and facetime.

53. It also impacted her ability to perform her job.

54. Second, during an onsite in Austin, Texas from December 17 through December 20, Ms. Lenner learned that all the Product, Engineering, and Design "golden cricket" awards went to PLG (another team led by Mr. Volk), Mr. Haan, and Mason Mackey, indicative of further gender/sex discrimination.

55. Ms. Young even left out Katie Green from the awards despite her massive deal with an important customer.

56. Men were favored at Ms. Lenner's expense in granting these awards.

57. Ms. Young had the ultimate veto power in granting these awards.

58. On December 18, 2024 at the Austin onsite, employee Max Thorson had a traumatic seizure in front of Jay Patel and Ms. Lenner.

59. Mr. Thorson screamed, fell to the floor, and shook for a long time.

60. It looked like he was dying on the floor in front of them.

61. An ambulance came and took him away.

62. Luckily, Mr. Thorson was ok.

63. However, Ms. Lenner was reasonably traumatized witnessing such a scary incident.

64. Mr. Yuan told Mr. Dyer on a Zoom call that those who witnessed the seizure could leave the onsite a day early.

65. Mr. Dyer relayed this message to Katie Green and Ms. Lenner via text, stating, "*Han said we could leave."*

66. He also told everyone present in a conference room in person that "*Han said we could leave.*"

67. He later confirmed it again in a one on one text message to Ms. Lenner.

68. Later that day, Ms. Young was rude and condescending toward Ms. Lenner.

69. Nonetheless, Ms. Lenner was respectful and attentive at the meeting.

70. The next day, on December 19, Ms. Lenner took her flight home a day earlier than planned.

71. She had told her superiors and some coworkers of her intentions.

72. She even told HR.

73. Mr. Carter from HR replied to Ms. Lenner that he "*totally understand[s]*."

74. It was the perfect opportunity for Ms. Young to retaliate in the ultimate fashion – termination.

75. On December 20, Mr. Yuan called Ms. Lenner to tell her that she was terminated.

76. He said that CEO Jeff Cavins "[was] pissed, from his perspective you disrespected his wife."

77. Mr. Cavins did not appreciate that Ms. Lenner would have the audacity to report Ms. Young for gender/sex discrimination.

78. Mr. Yuan asked Ms. Lenner to decide whether to resign or be fired.

79. Ms. Lenner would not resign, so she was fired, effective at the end of December 2024.

80. In stark contrast to Ms. Lenner's treatment, her male colleague, Mr. Volk, engaged in a serious offense—drinking ("blackout wasted," as a colleague recalled), driving, and crashing a golf cart during an Outdoorsy event—causing significant physical and monetary damage.

81. Outdoorsy took virtually no disciplinary action against Mr. Volk and he is still employed, highlighting the Company's discriminatory practices.

82. There is no justification for Ms. Lenner's termination other than retaliation for her protected complaints of gender/sex discrimination.

83. Ms. Lenner was left unemployed. Even worse, she suffered, and continues to suffer, significant emotional distress and economic hardship due to the sudden wrongful termination around the holidays in December 2024. Here reputation is severely tarnished.

FIRST CAUSE OF ACTION

FEHA Gender/Sex Discrimination

Gov. Code Section 12940(a)

(Against all Defendants)

84. Ms. Lenner re-alleges and incorporates by reference each and every allegation set forth above and below.

85. Ms. Lenner was an employee of Outdoorsy.

86. Outdoorsy was an employer within the meaning of FEHA with more than five employees.

87. FEHA prohibits discrimination based on sex/gender. Gov. Code § 12940(a).

88. Ms. Lenner is a female.

89. As more fully set forth above, Defendants, and in particular, Ms. Young, Chief Marketing Officer, discriminated against Ms. Lenner based on her female sex/gender.

90. For example, among other things, Ms. Young complained about Ms. Lenner's uptalking in a manner rooted in gender stereotypes.

91. Outdoorsy treated Ms. Lenner, a female, different than her male colleagues in terms of feedback and criticism.

92. Then, Outdoorsy terminated Ms. Lenner's employment because she is female.

93. Ms. Lenner was therefore subjected to an adverse employment action because of and/or substantially motivated by her female sex/gender.

94. Ms. Lenner was harmed.

95. The discrimination was a substantial factor in causing Ms. Lenner's harm.

96. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Lenner has suffered damages including, without limitation, lost income, compensation and benefits, physical injuries, physical distress, emotional distress, pain and suffering, depression, anxiety, humiliation, and loss of reputation and other injuries in an amount far beyond that which required in unlimited jurisdiction and to be proven at trial.

97. Defendants' actions were fraudulent, malicious and oppressive, because, among other things, the conduct was carried out and ratified by Outdoorsy's CEO and Chief Marketing Officer with zero regard for Ms. Lenner's emotional and/or physical safety or legal rights. Thus, Ms. Lenner is entitled to recover punitive damages from Defendants, and each of them.

SECOND CAUSE OF ACTION

FEHA Retaliation

Gov. Code Section 12940(h)

(Against all Defendants)

98. Ms. Lenner re-alleges and incorporates by reference each and every allegation set forth above and below.

99. Ms. Lenner was an employee of Outdoorsy.

100. Outdoorsy was an employer within the meaning of FEHA with more than five employees.

101. FEHA prohibits retaliation against an employee who has opposed or reported any practice forbidden by FEHA. Gov. Code. § 12940(h).

102. Ms. Lenner made a protected report under FEHA when she reported sex/gender discrimination to HR and informed her supervisor.

103. Outdoorsy retaliated against Ms. Lenner by, among other things, making it more difficult for her to be successful in the workplace and stopping her from receiving coveted awards.

104. Then, in the ultimate form of retaliation, it terminated her employment.

105. A causal link existed between Ms. Lenner's protected conduct and Defendant's termination of her employment and other adverse employment actions.

106. Ms. Lenner was harmed.

107. The retaliation was a substantial factor in causing Ms. Lenner's harm.

108. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Lenner has suffered damages including, without limitation, lost income, compensation and benefits, physical injuries, physical distress, emotional distress, pain and suffering, depression, anxiety, humiliation, and loss of reputation and other injuries in an amount far beyond that which required in unlimited jurisdiction and to be proven at trial.

109. Defendants' actions were fraudulent, malicious and oppressive, because, among other things, the conduct was carried out and ratified by Outdoorsy's CEO and Chief Marketing

Officer with zero regard for Ms. Lenner's emotional and/or physical safety or legal rights. Thus, Ms. Lenner is entitled to recover punitive damages from Defendants, and each of them.

THIRD CAUSE OF ACTION

Failure to Prevent Discrimination and Retaliation

Gov. Code Section 12940(K)

(Against all Defendants)

110. Ms. Lenner re-alleges and incorporates by reference each and every allegation set forth above and below.

111. Ms. Lenner was an employee of Outdoorsy.

112. Outdoorsy was an employer within the meaning of FEHA with more than five employees.

113. FEHA provides in pertinent part that employers must take all reasonable steps to prevent discrimination and retaliation. Gov. Code § 12940(k).

114. The actions and conduct of Defendants, as alleged hereinabove, constitute failure to prevent discrimination and retaliation, in violation of FEHA.

115. Respondents had inadequate policies and procedures in place to prevent discrimination and retaliation, and stop discrimination and retaliation.

116. Senior Outdoorsy leaders, such as the CEO and Chief Marketing Officer, were aware of discrimination and retaliation, but carried it out anyways without taking any corrective actions.

117. There were inadequate remedial actions.

118. Ms. Lenner was harmed.

119. The failure to prevent discrimination and retaliation was a substantial factor in causing Ms. Lenner's harm.

120. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Lenner has suffered damages including, without limitation, lost income, compensation and benefits, physical injuries, physical distress, emotional distress, pain and

suffering, depression, anxiety, humiliation, and loss of reputation and other injuries in an amount far beyond that which required in unlimited jurisdiction and to be proven at trial.

121. Defendants' actions were fraudulent, malicious and oppressive, because, among other things, the conduct was carried out and ratified by Outdoorsy's CEO and Chief Marketing Officer with zero regard for Ms. Lenner's emotional and/or physical safety or legal rights. Thus, Ms. Lenner is entitled to recover punitive damages from Defendants, and each of them.

FOURTH CAUSE OF ACTION

Wrongful Termination in Violation of Public Policy

(Against all Defendants)

122. Ms. Lenner re-alleges and incorporates by reference each and every allegation set forth above and below.

123. It is an unlawful employment practice and violation of public policy to discharge an employee in retaliation for reporting sex and/or gender based discrimination.

124. It is also an unlawful employment practice and violation of public policy to discharge an employee based on her female sex and/or gender.

125. Outdoorsy terminated Ms. Lenner in retaliation for reporting sex/gender based discrimination and based on her female sex and/or gender.

126. Ms. Lenner was harmed.

127. The wrongful termination was a substantial factor in causing Ms. Lenner harm.

128. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Lenner has suffered damages including, without limitation, lost income, compensation and benefits, physical injuries, physical distress, emotional distress, pain and suffering, depression, anxiety, humiliation, and loss of reputation and other injuries in an amount far beyond that which required in unlimited jurisdiction and to be proven at trial.

129. Defendants' actions were fraudulent, malicious and oppressive, because, among other things, the conduct was carried out and ratified by Outdoorsy's CEO and Chief Marketing

Officer with zero regard for Ms. Lenner's emotional and/or physical safety or legal rights. Thus, Ms. Lenner is entitled to recover punitive damages from Defendants, and each of them.

PRAYER FOR RELIEF

WHEREFORE, Ms. Lenner prays that this Court enter judgment in her favor on every claim and relief against Defendants and each of them, as follows:

1. For compensatory damages;
2. For punitive damages;
3. For pre-judgment and post-judgment interest, at the legal rate;
4. For attorney's fees and costs;
5. For applicable penalties;
6. For costs of suit;
7. For declaratory relief; and
8. For all such other and further relief as the court may deem just, proper and equitable.

Dated: March 4, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Haley Lenner

JURY DEMAND

PLAINTIFF HALEY LENNER demands trial by jury on all issues so triable.

Dated: March 4, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Haley Lenner