

Throughout his employment, Mr. Greenidge received a number of written warnings and disciplines for, *inter alia*, failing to perform certain basic job functions or for being indifferent to the airline's customers. (J Ex. 3(a) – (d)). On October 11, 2011, Mr. Greenidge received a written warning and a two-day suspension for failing to provide wheelchair services to airline passengers. (J Ex. 3(c)). Though the wheelchair dispatcher requested Mr. Greenidge provide the services, Mr. Greenidge refused “linger[ing] around until [he] could pass the request” to another employee. Id. As a result of Mr. Greenidge's “indifference,” the passengers waited an “unreasonable amount of time for their wheelchairs resulting in complaints from the airlines.” Id.

Terminal Manager Louise Consiglio instructed Mr. Greenidge to “do whatever is required for you to improve your attitude and awareness of the services Alstate provides in this terminal.” Id. The warning, which Mr. Greenidge signed, informed Mr. Greenidge that continued violations of Company policy would result in “more severe disciplinary action up to and including termination.” Id.

#### **IV. EVENTS OF JULY 17, 2013**

On July 17, 2013, Lufthansa Airlines Station Manager Isabelle Roeder contacted TOGA Manager on Duty Klaudia Fitzgerald to inform Ms. Fitzgerald that a German soccer team traveling on Lufthansa “required assistance because they were traveling with equipment.” (Tr. 168). In turn, Ms. Fitzgerald contacted an Alstate supervisor to “make sure” the four skycaps on duty – Terrance Boodram, Basil Rodney, Allan Wills and Mr. Greenidge – were waiting at the terminal curbside to assist with the passengers' luggage *when the passengers arrived at the*

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