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TRIBUNALE ORDINARIO DI CATANZARO

SEZIONE LAVORO

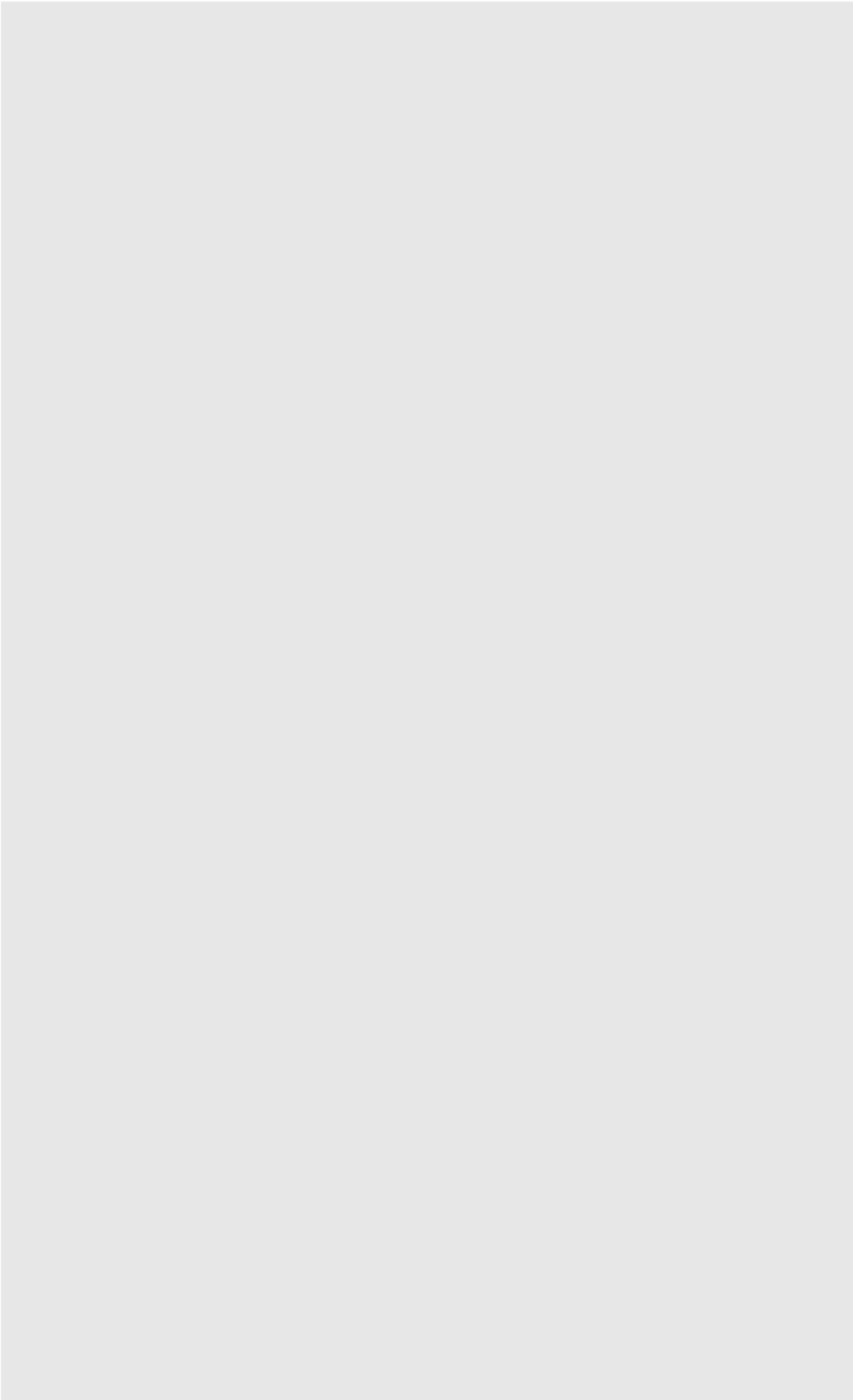
RICORSO EX ART. 414 C.P.C.

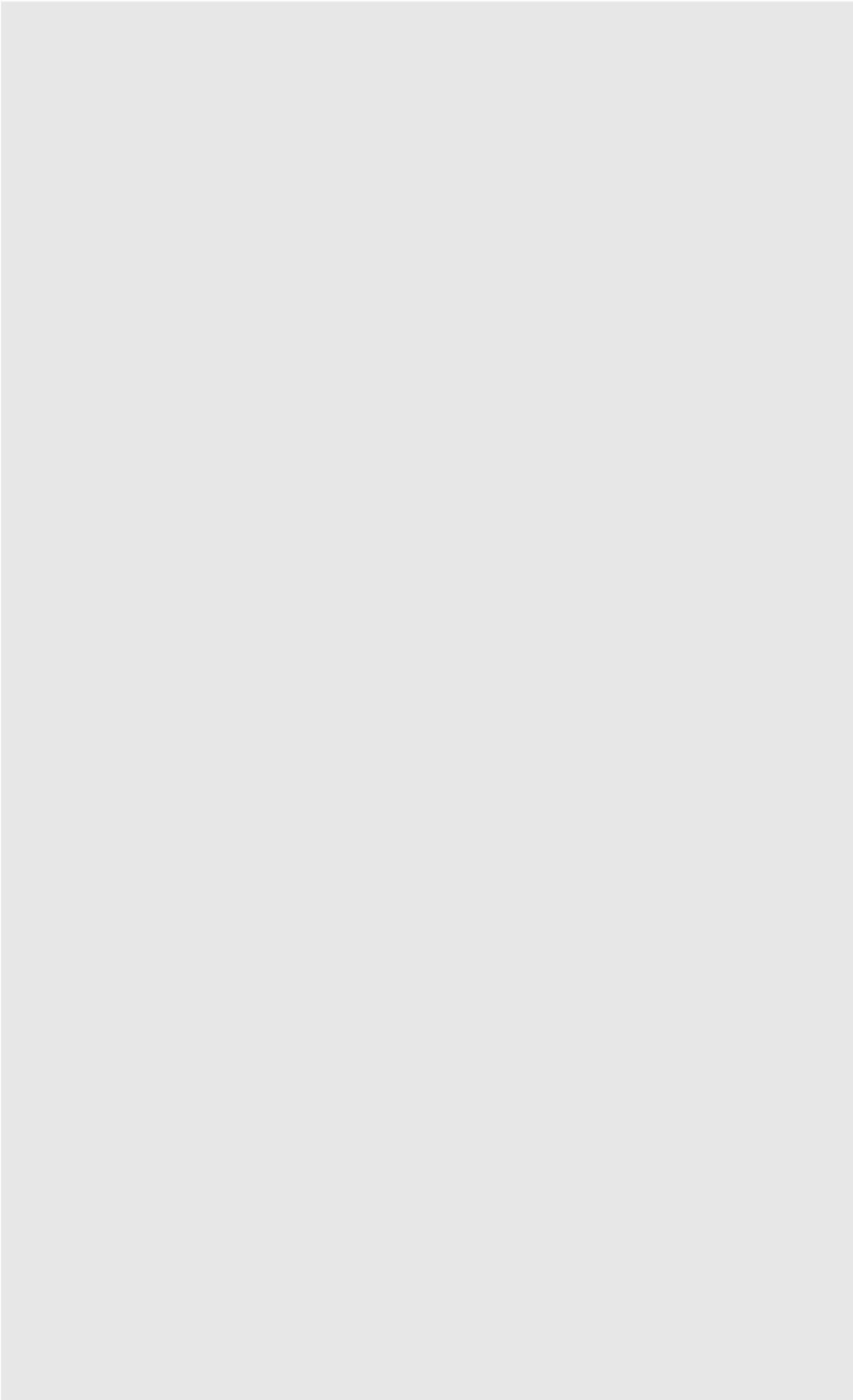
[REDACTED] f.:
[REDACTED] up
[REDACTED], rappresentata e difesa dall'Avvocato Giuseppe Pio Torcicollo
(c.f.: TRCGPP70P24C349V), con studio in Roma (RM),
Circonvallazione Clodia n. 5 (cap 00195, Pec:
giuseppepiotorcicollo@ordineavvocatiroma.org; Fax: 06 87.77.77.77),
ed elettivamente domiciliata presso l'indirizzo telematico del suddetto
avvocato **- RICORRENTE -**

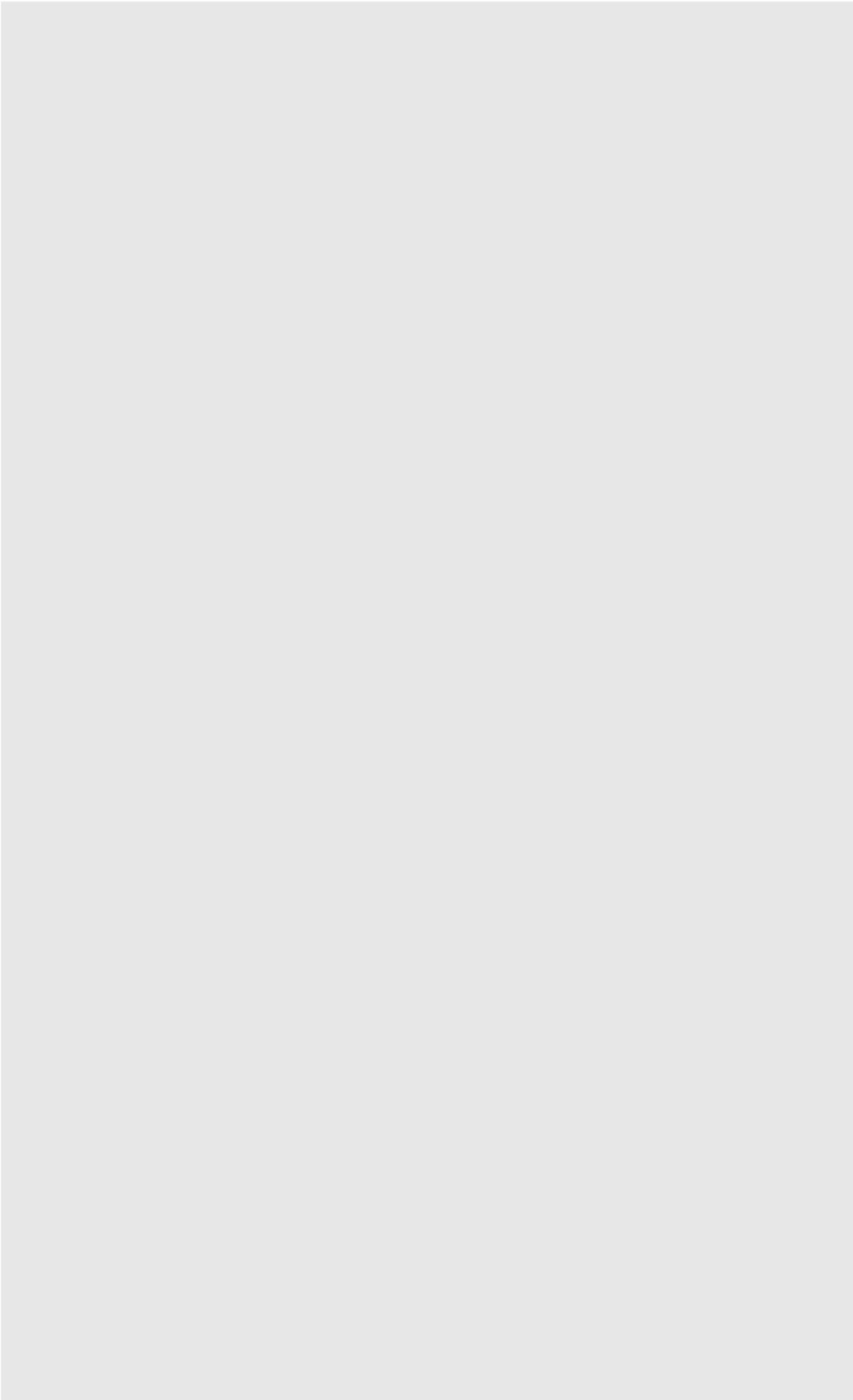
Contro: ISTAT-Istituto Nazionale di Statistica, in persona del legale
rappresentante p.t., con sede in Roma, via Cesare Balbo n. 16 (CF
80111810588) **- RESISTENTE -**

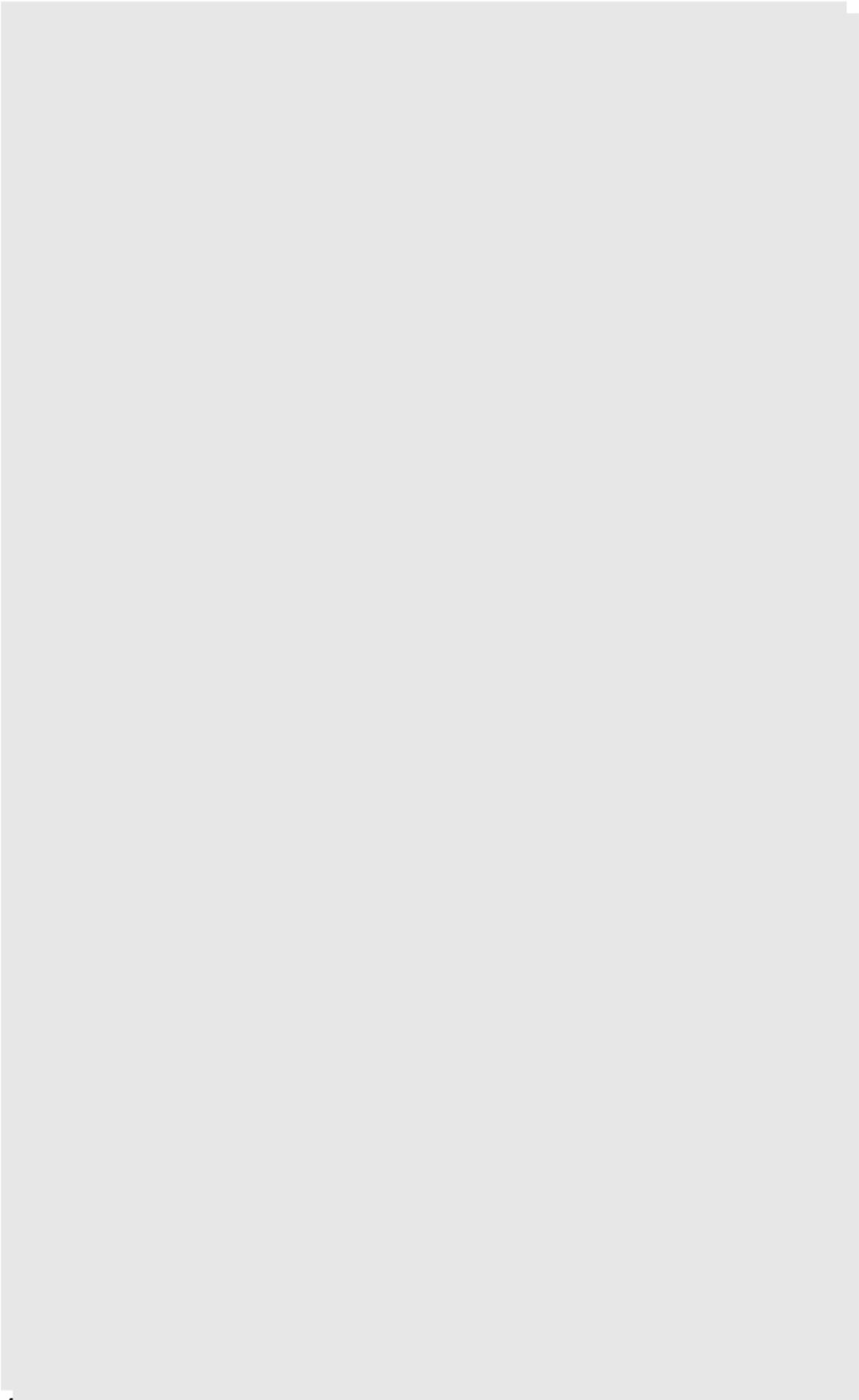
FATTO

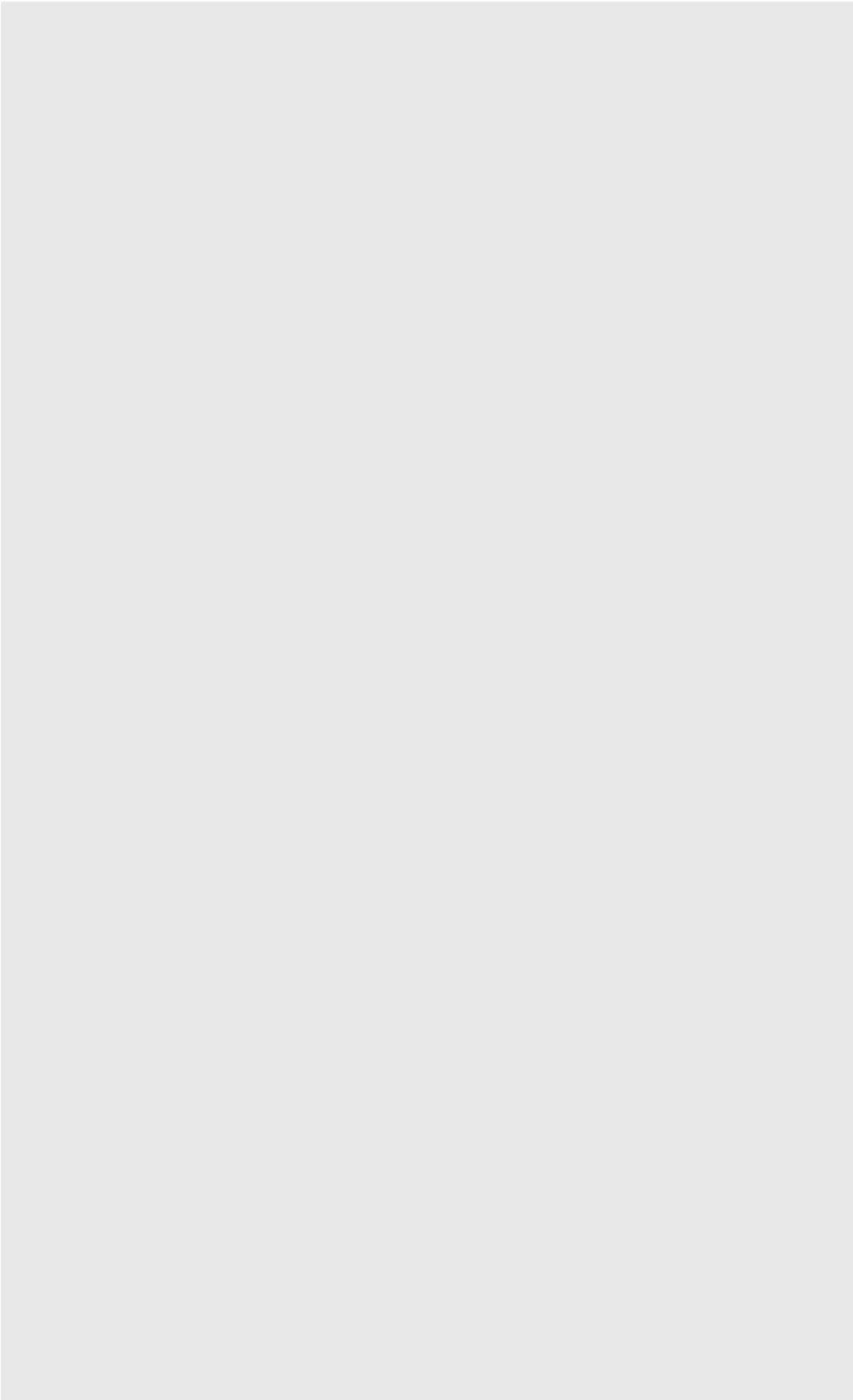
1) L'odierna ricorrente è una dipendente dell'ISTAT attualmente in servizio a Catanzaro, assunta dall'Ente prima con contratti a tempo

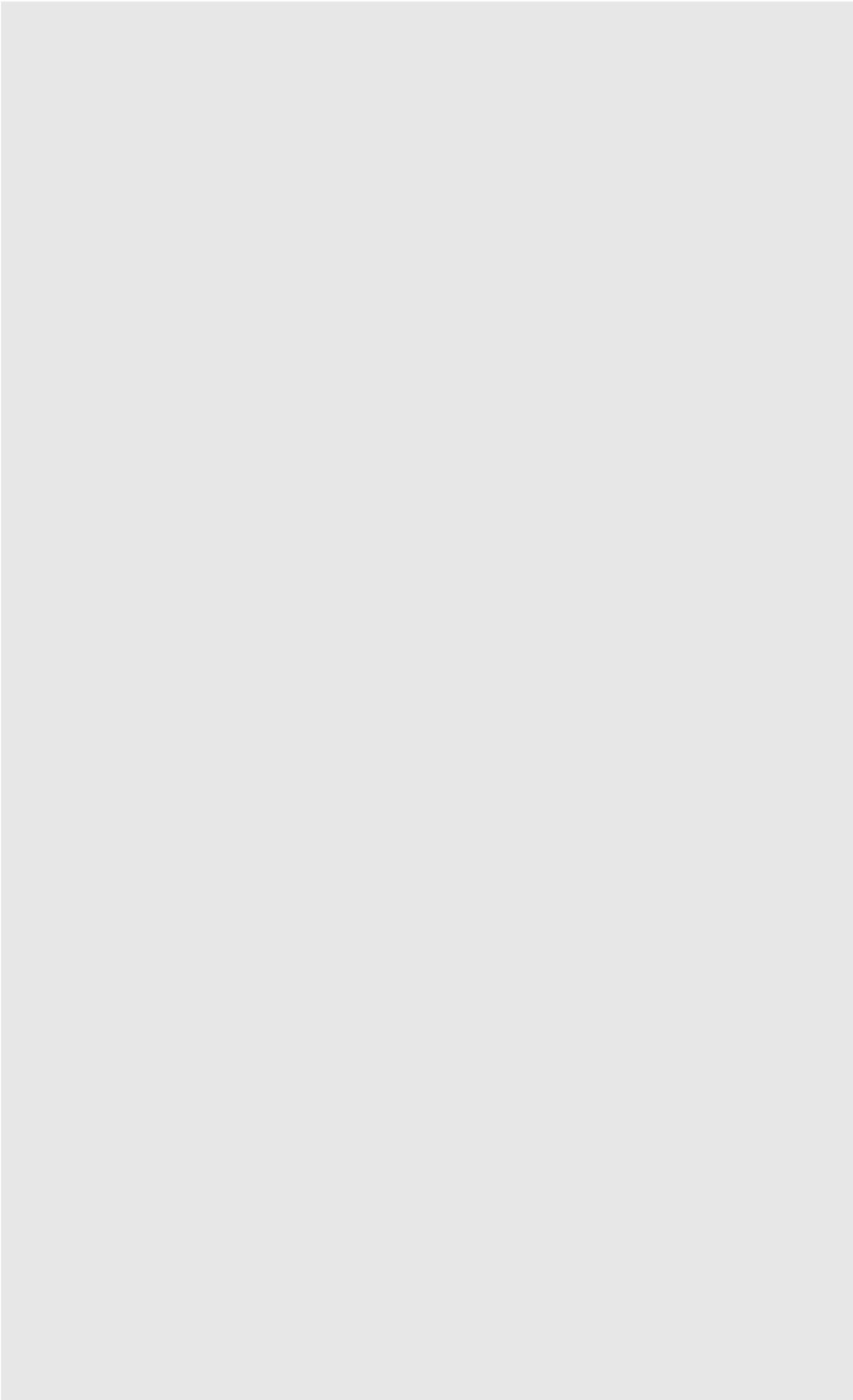


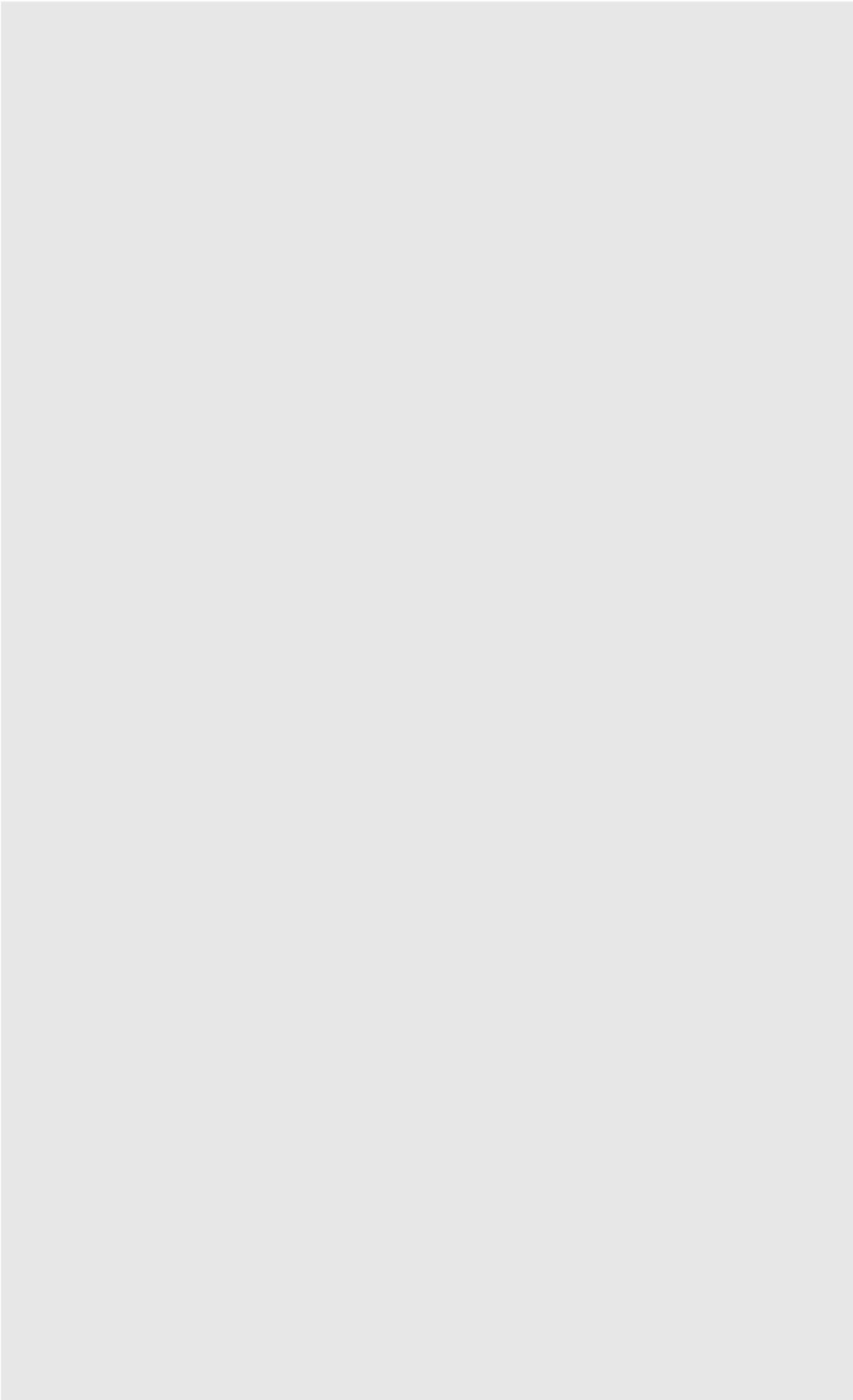


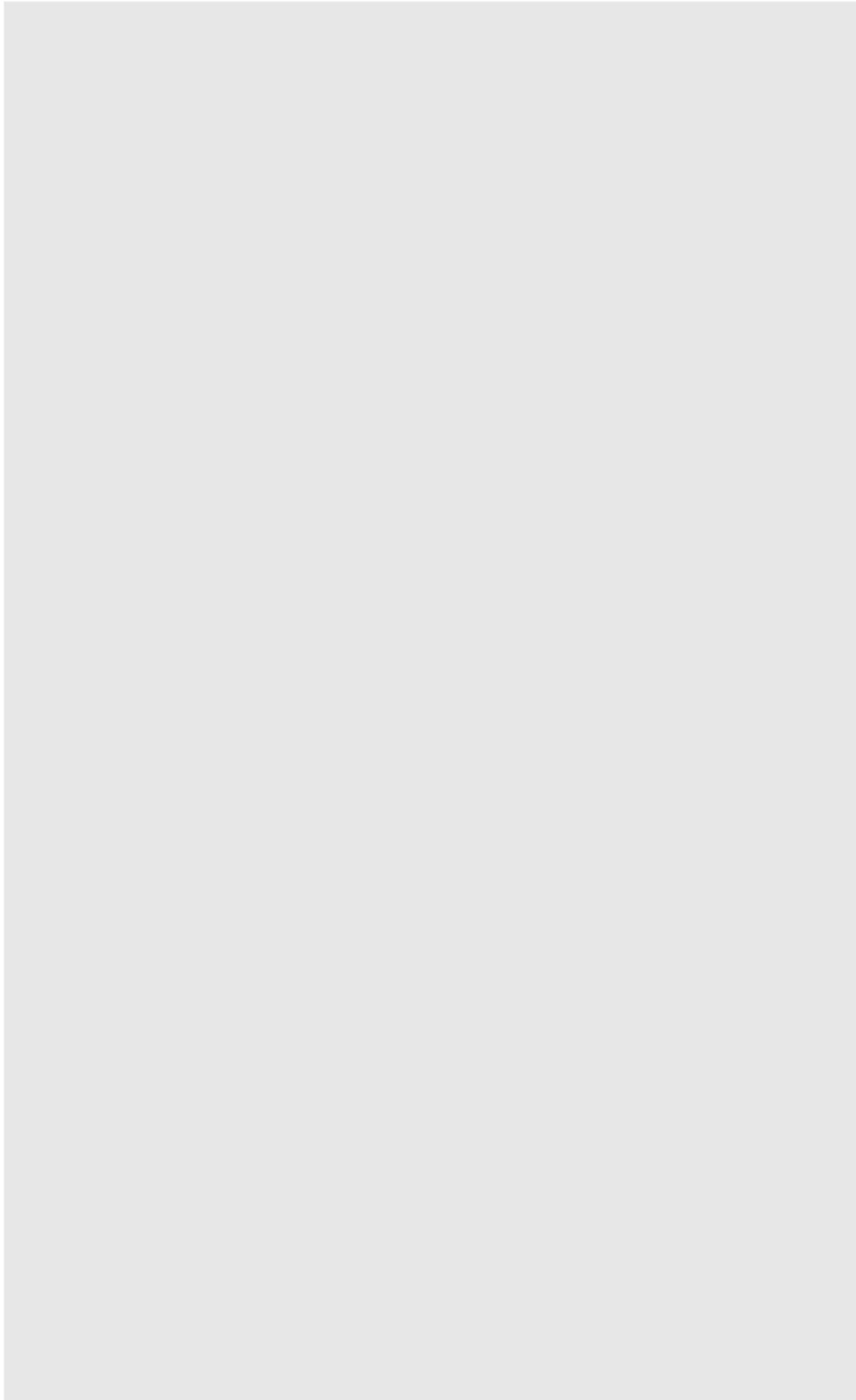


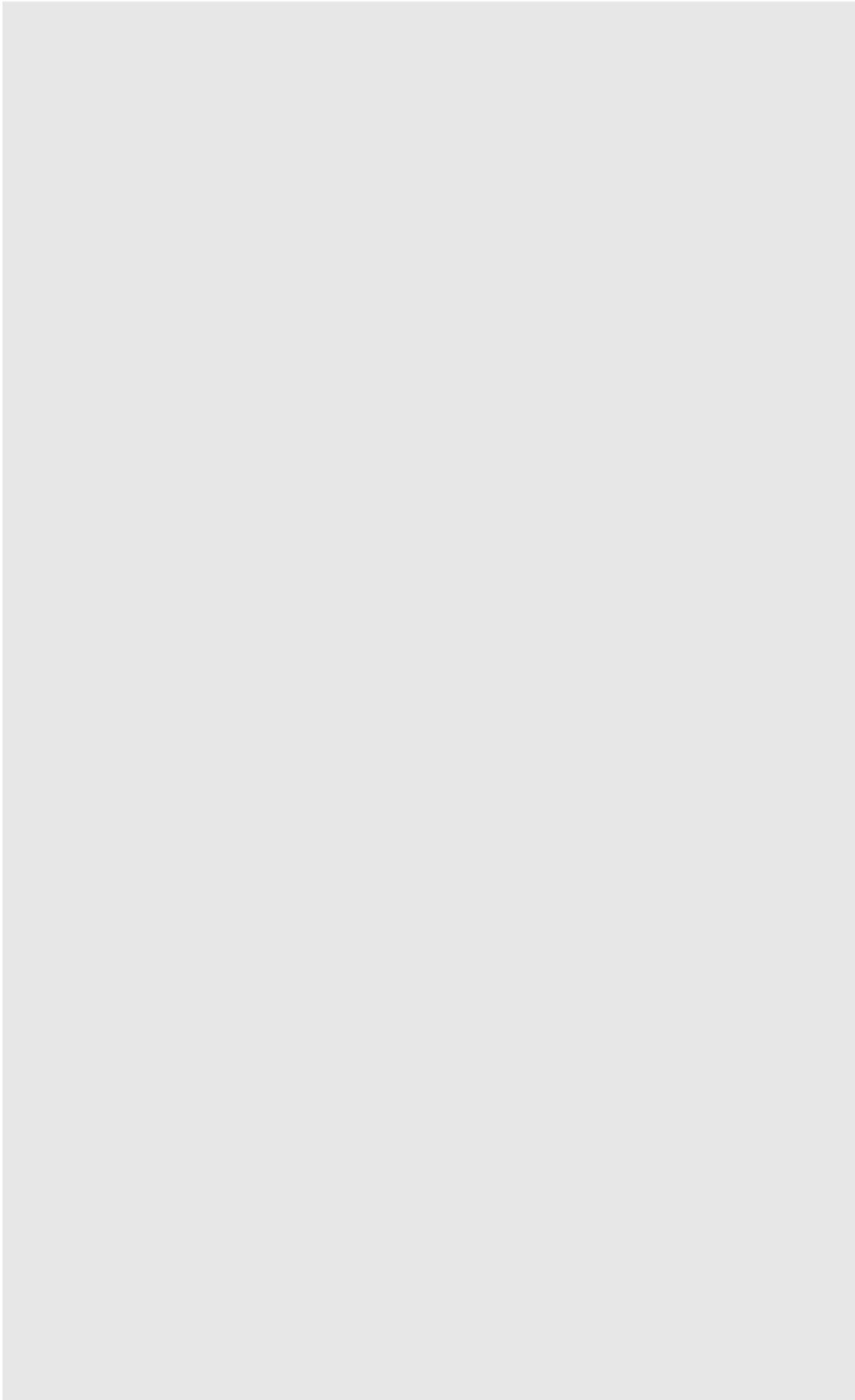


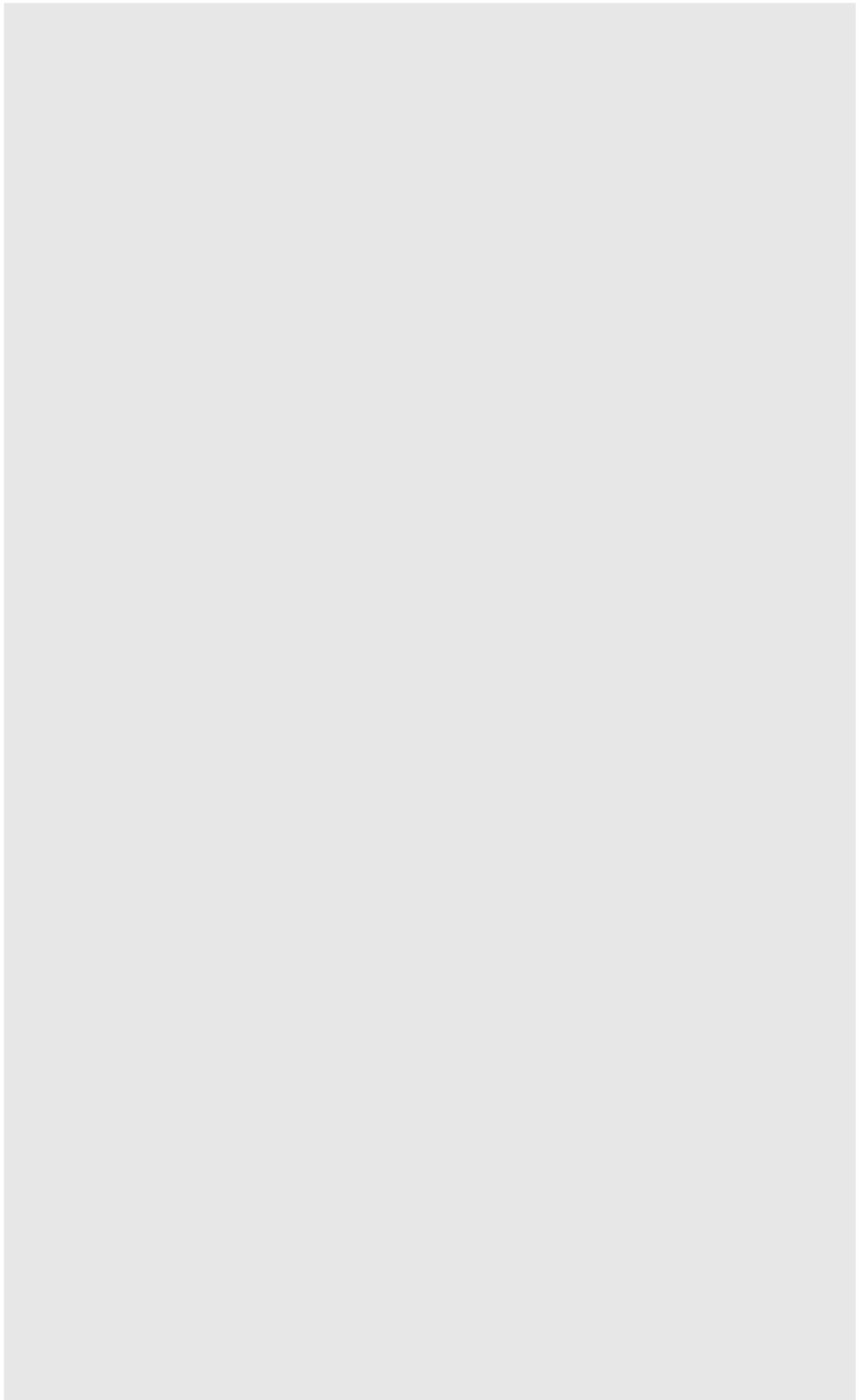


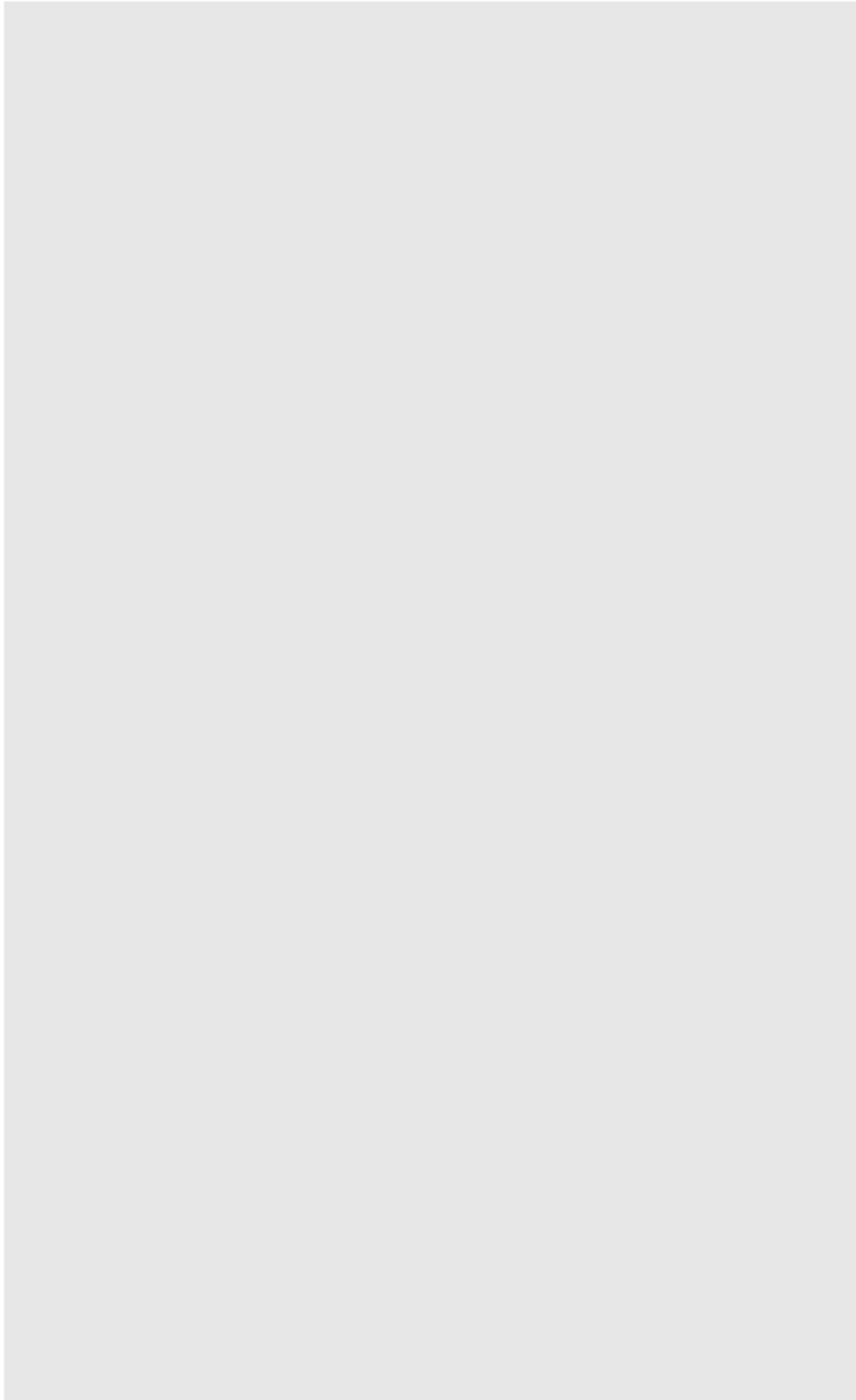


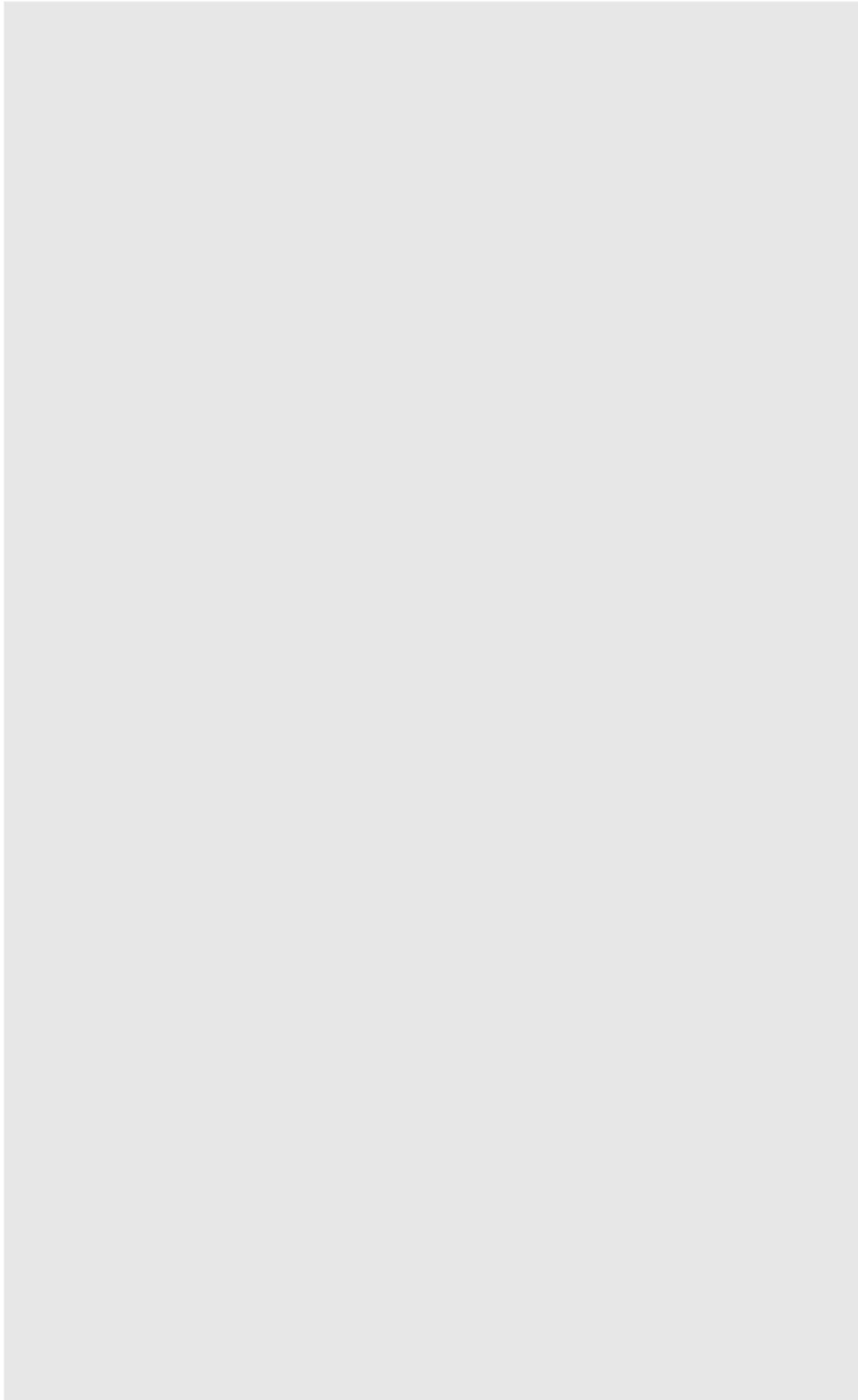


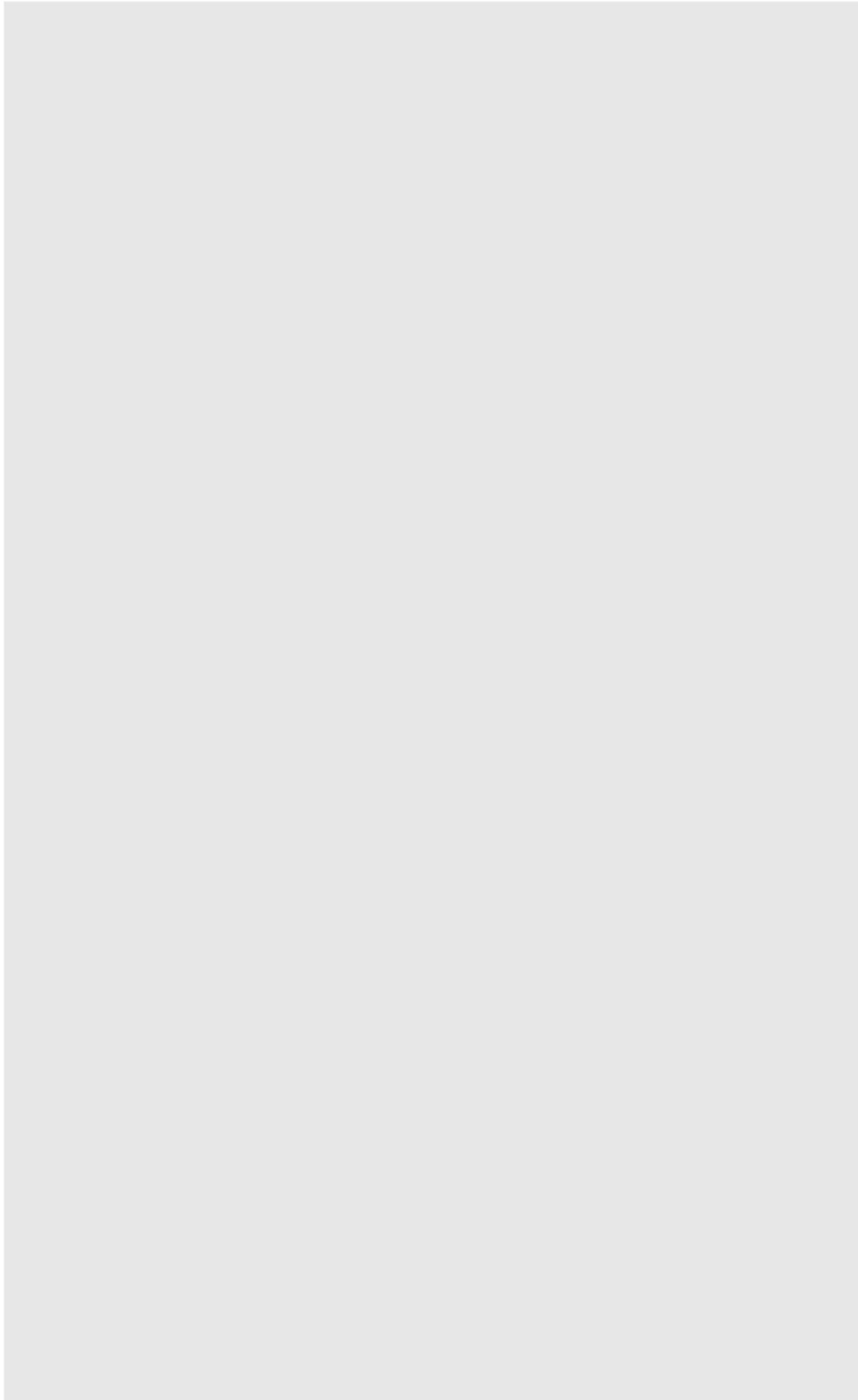


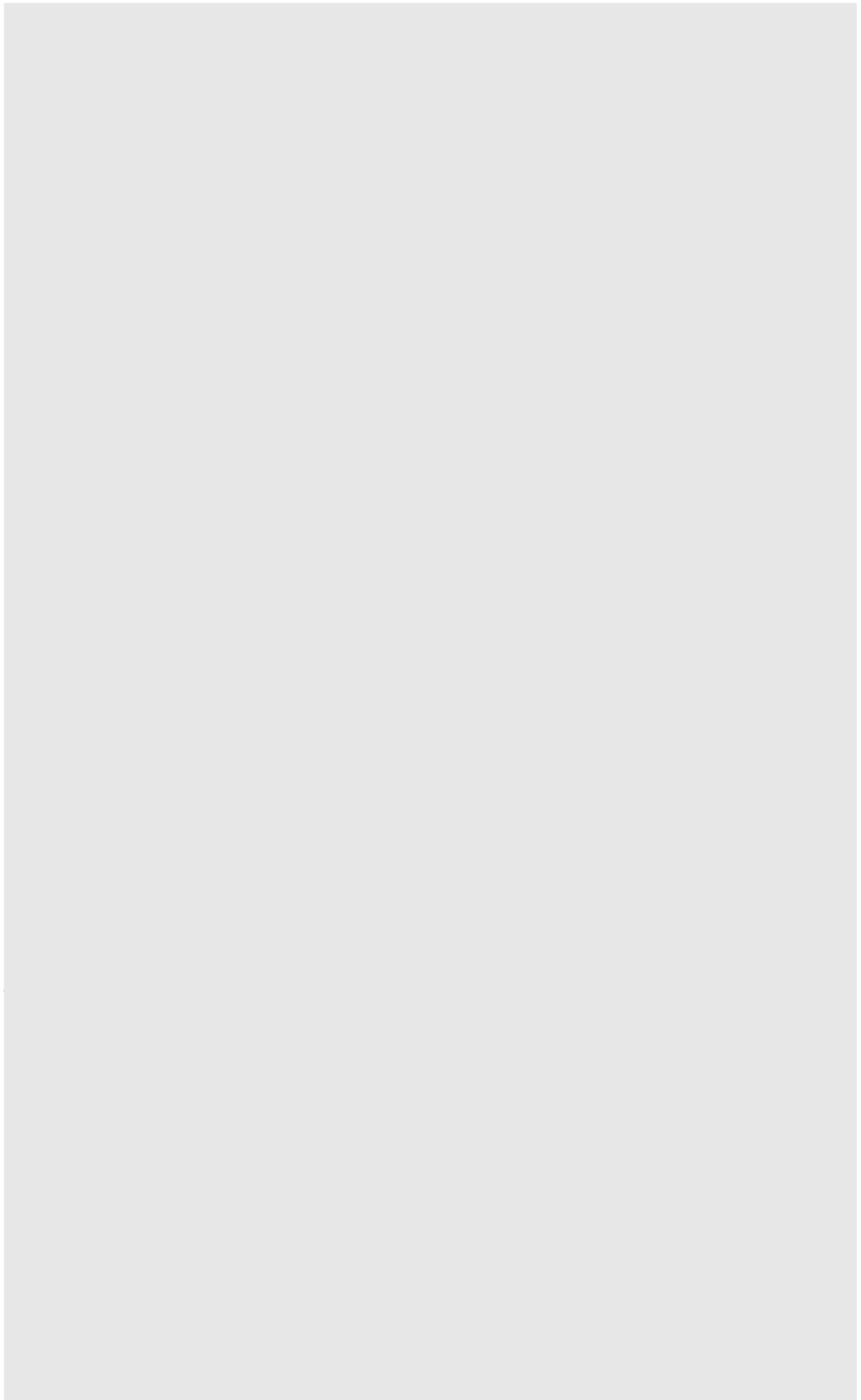


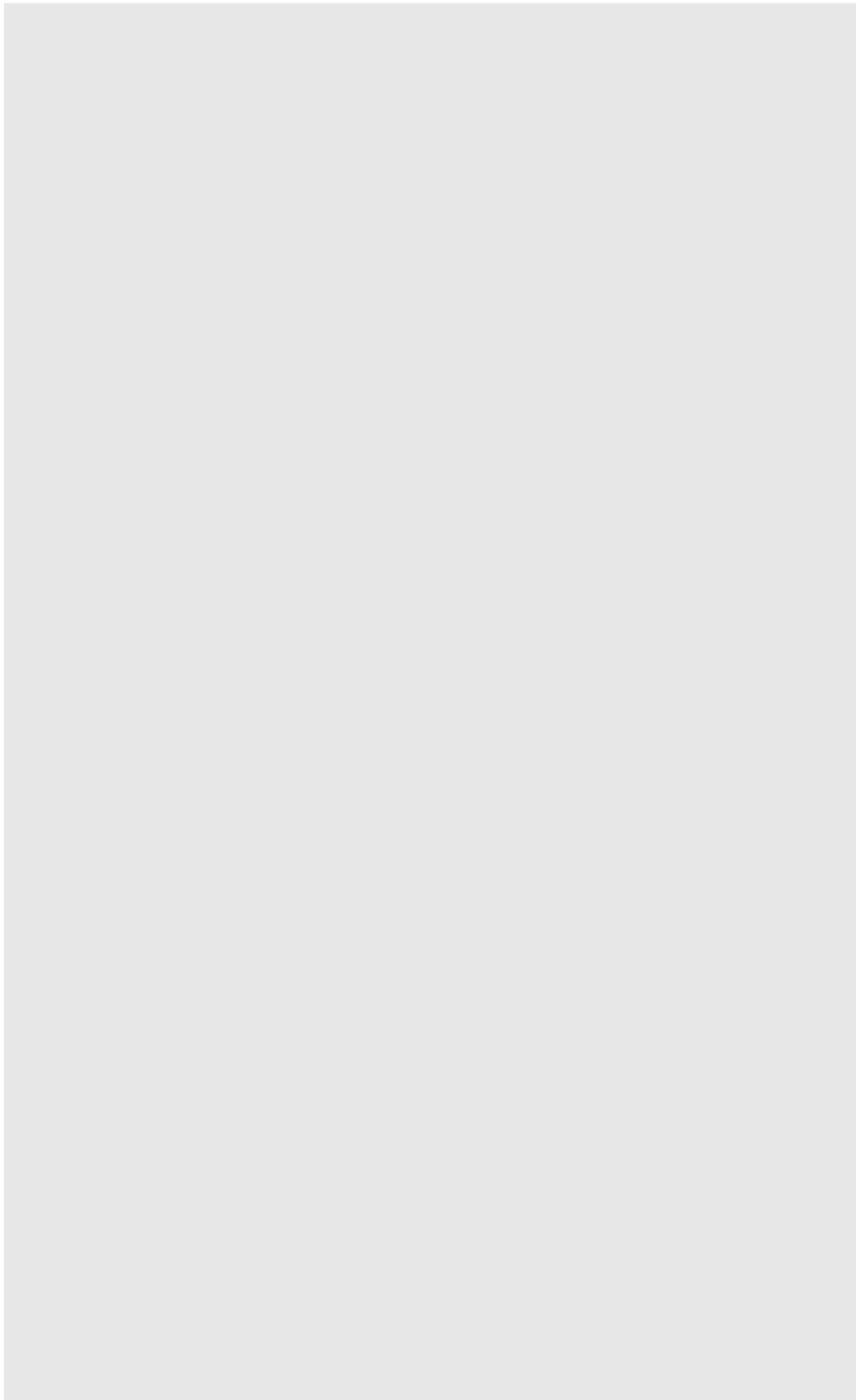


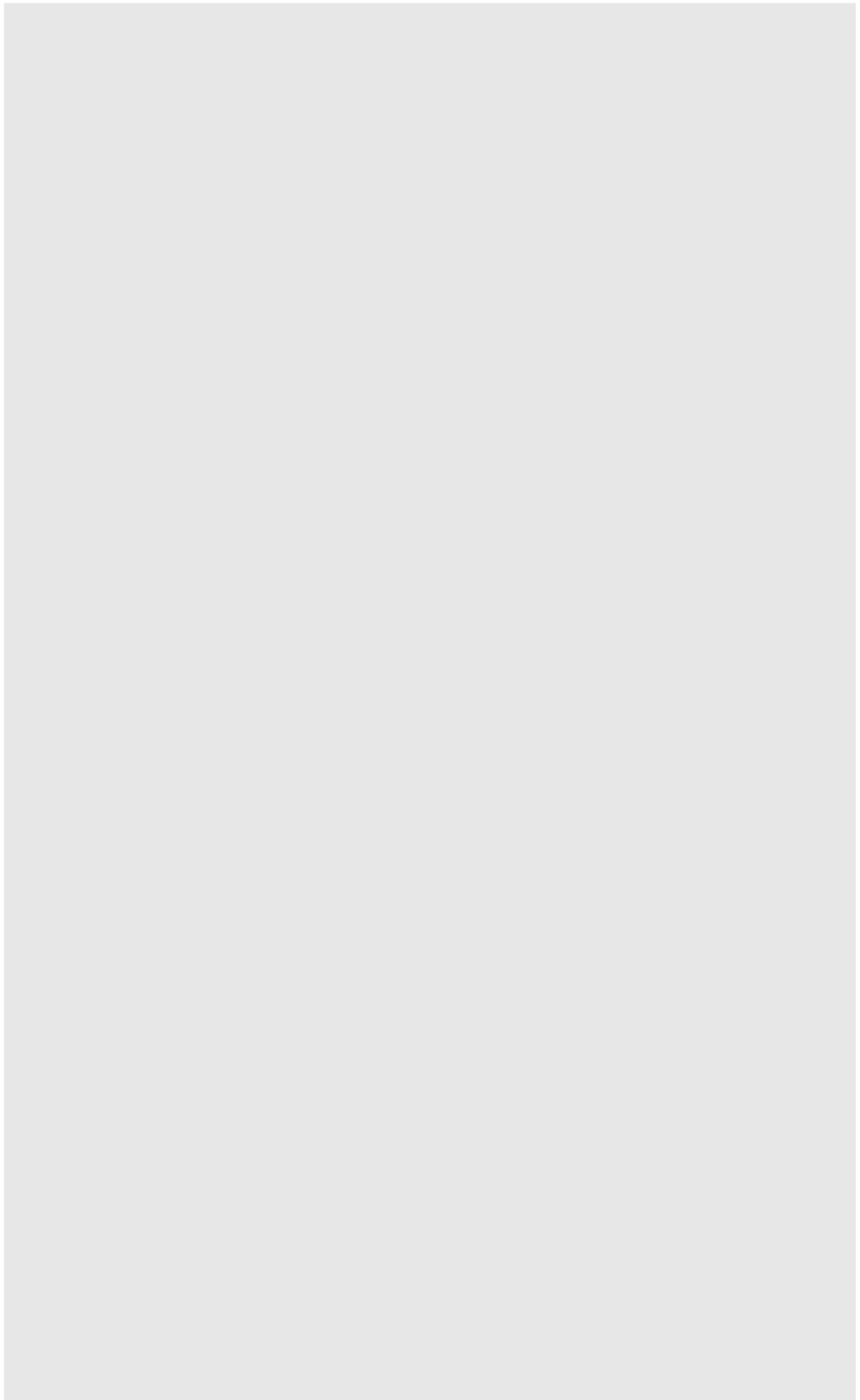


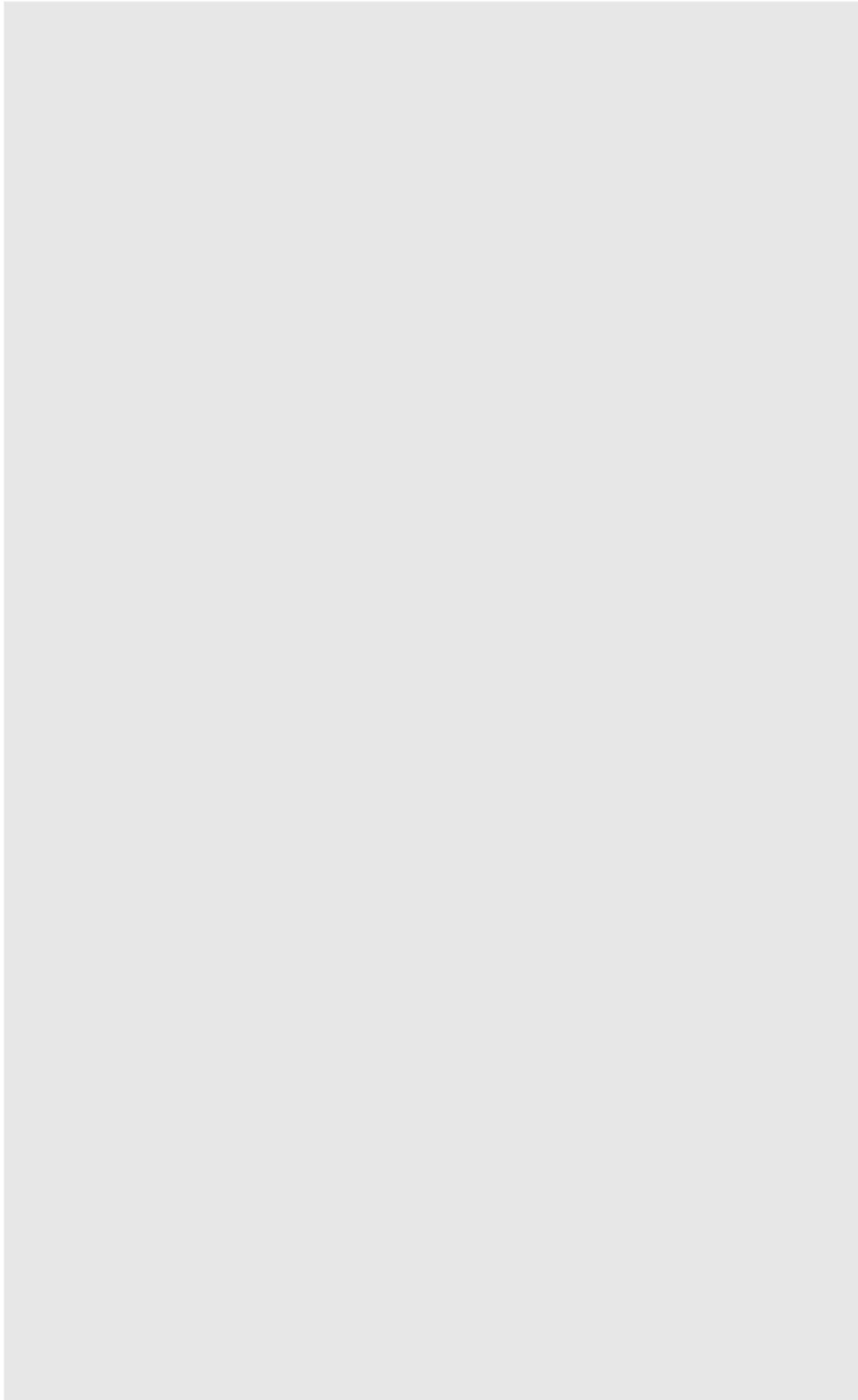


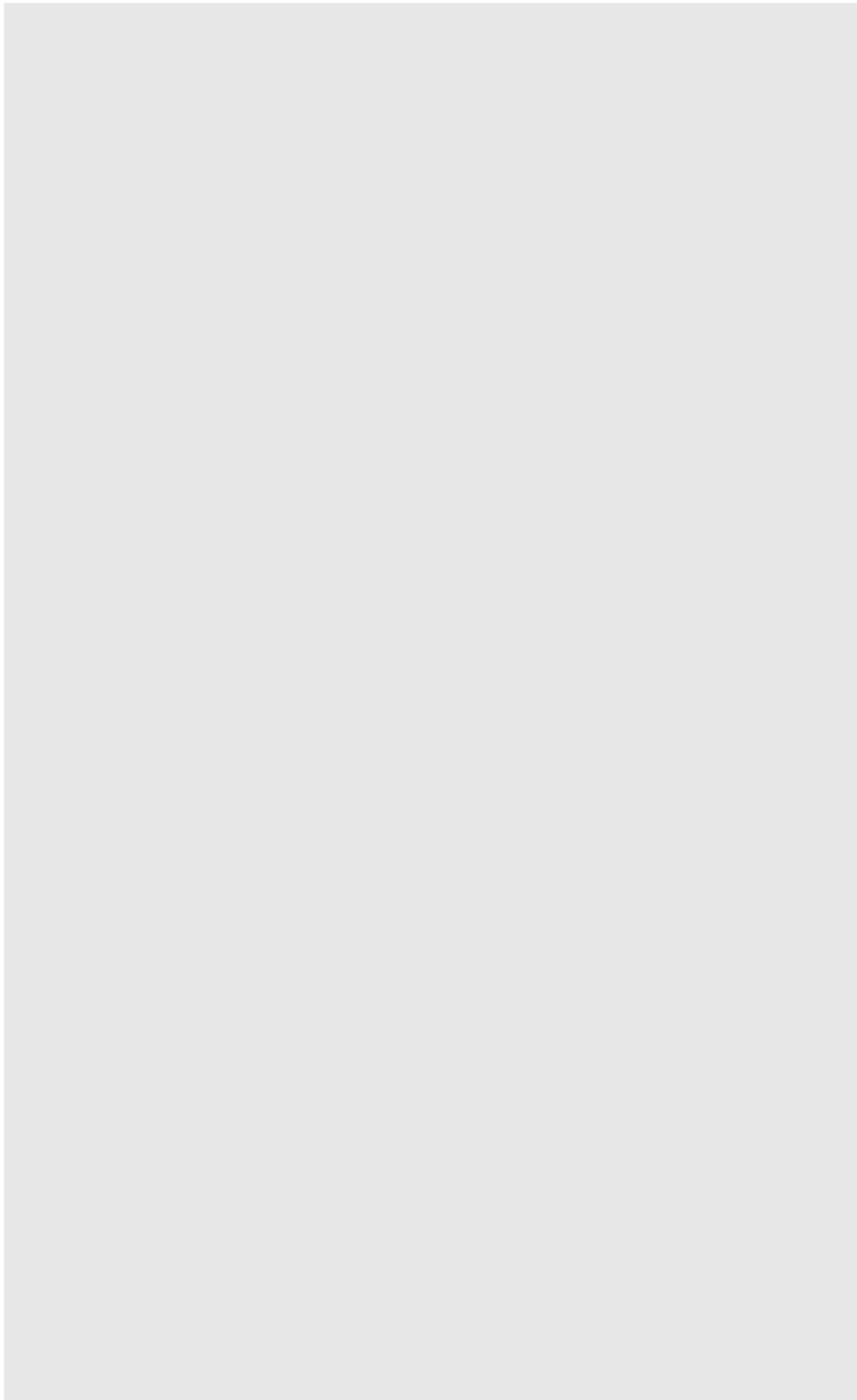


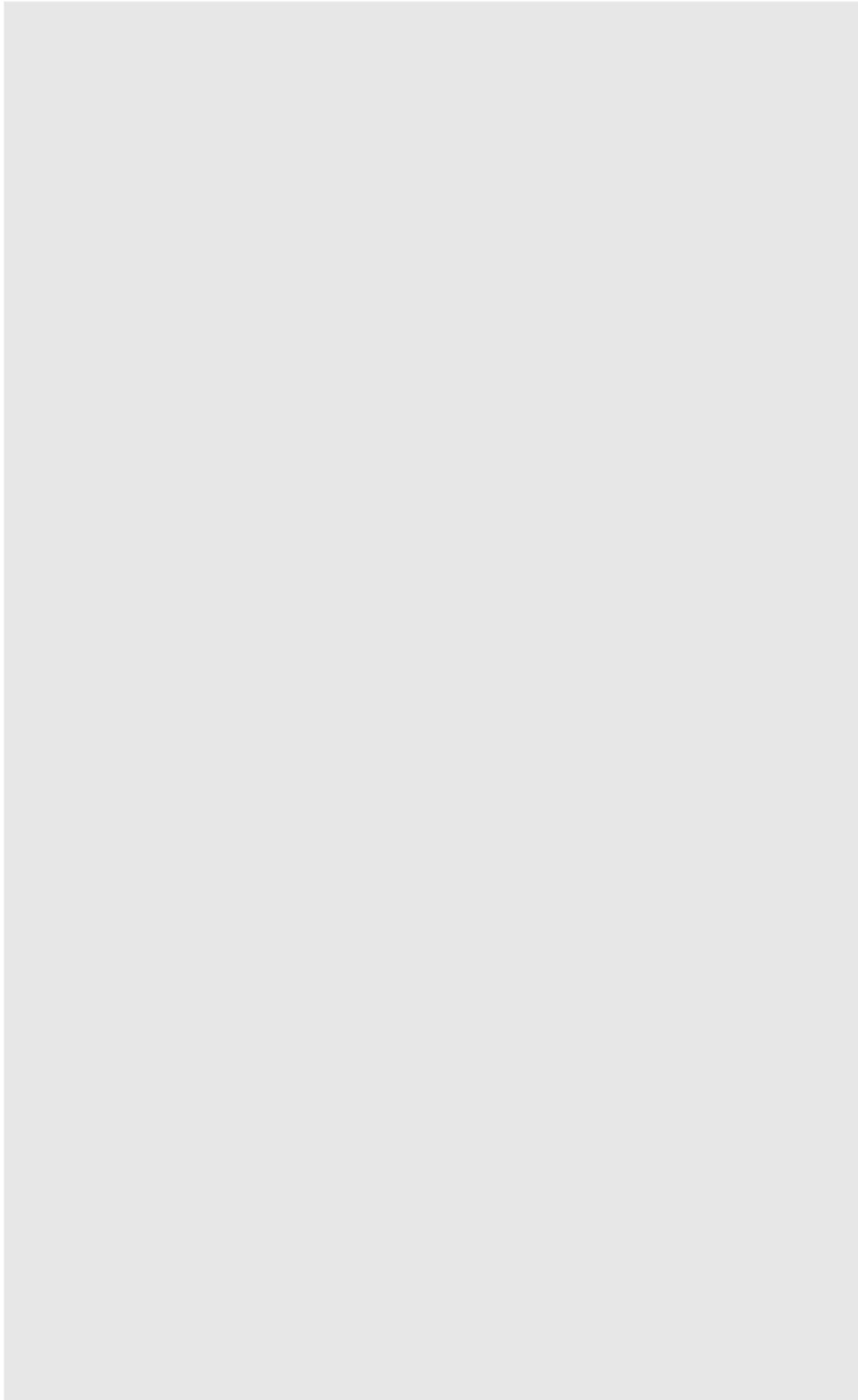


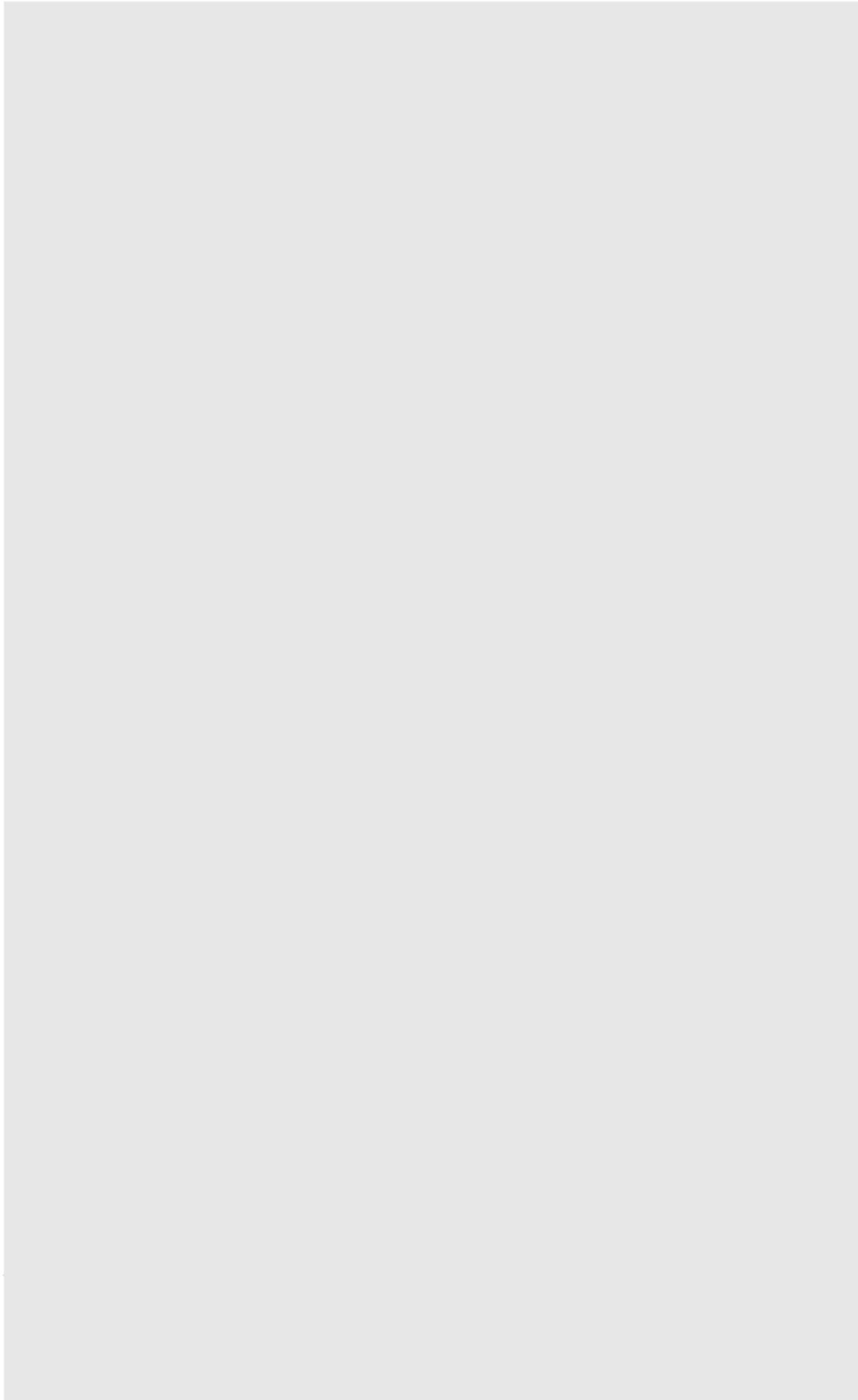


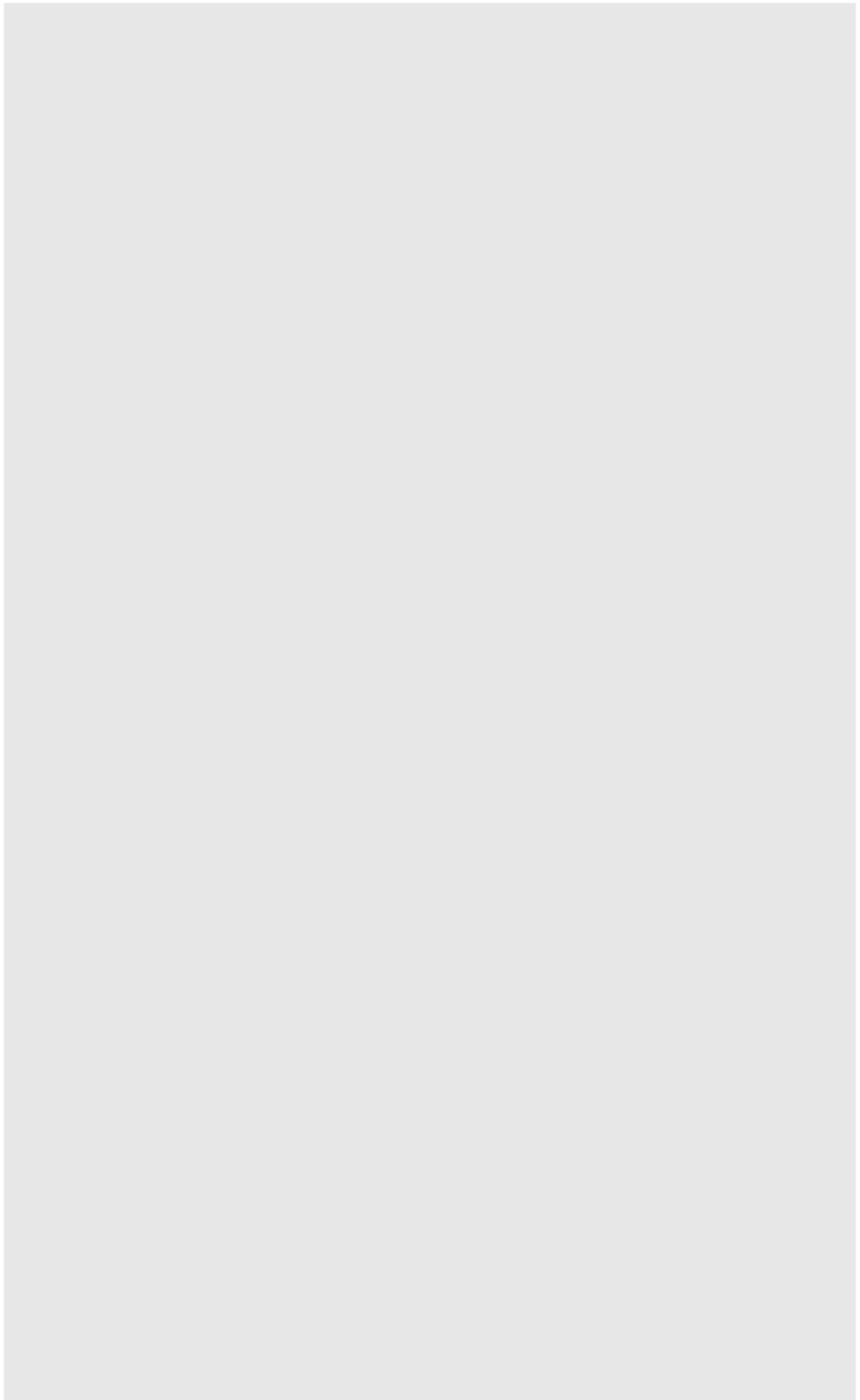


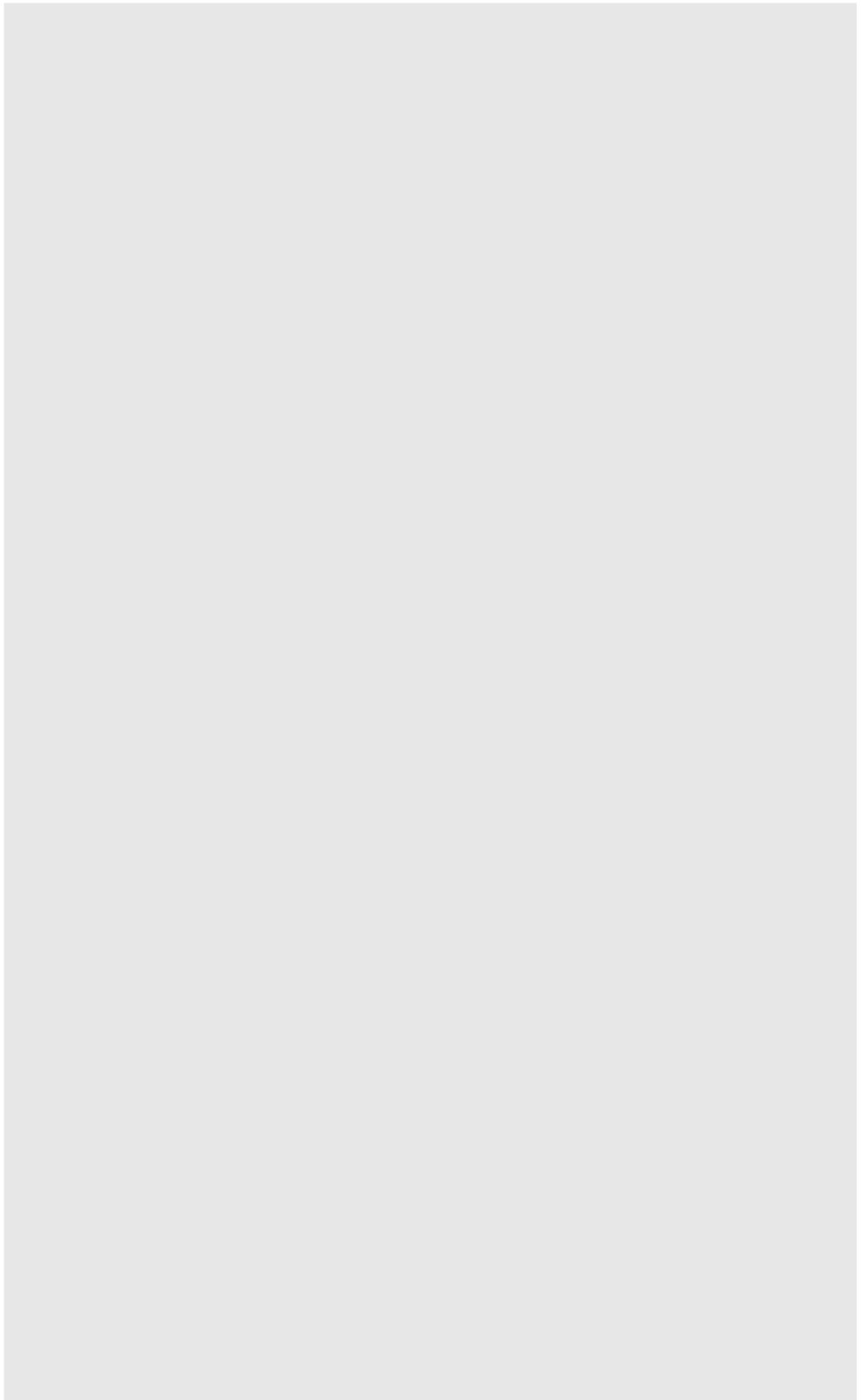


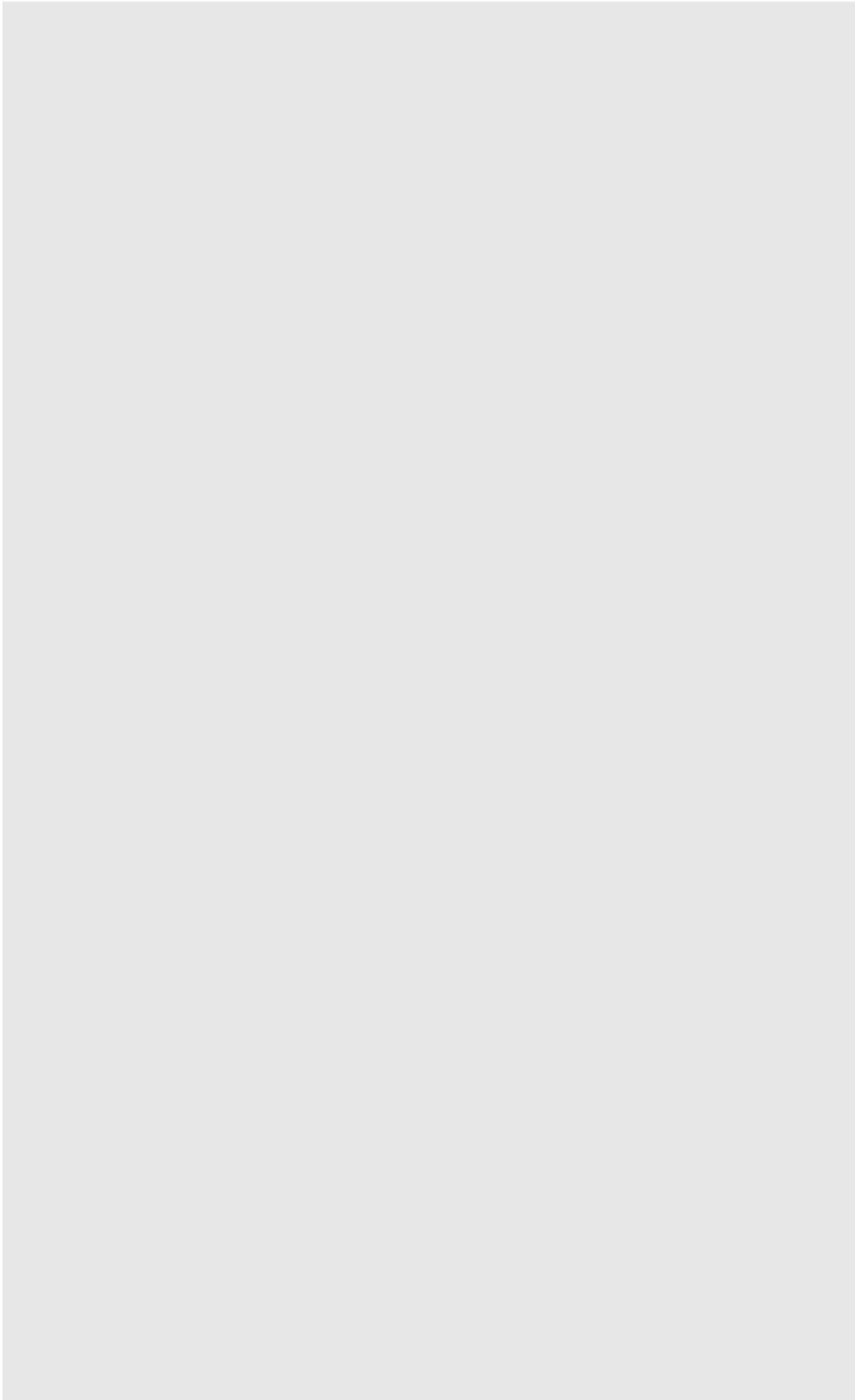


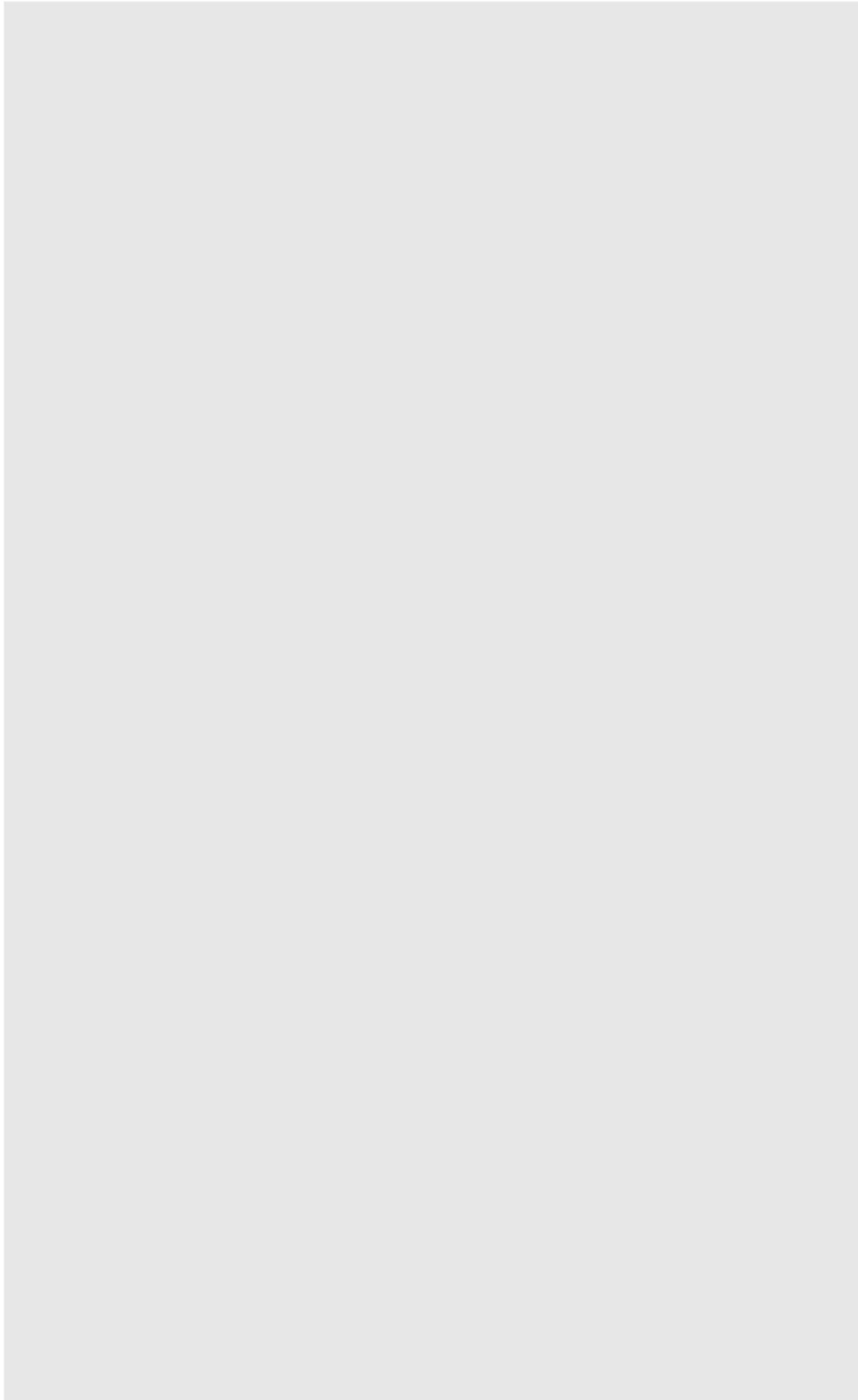


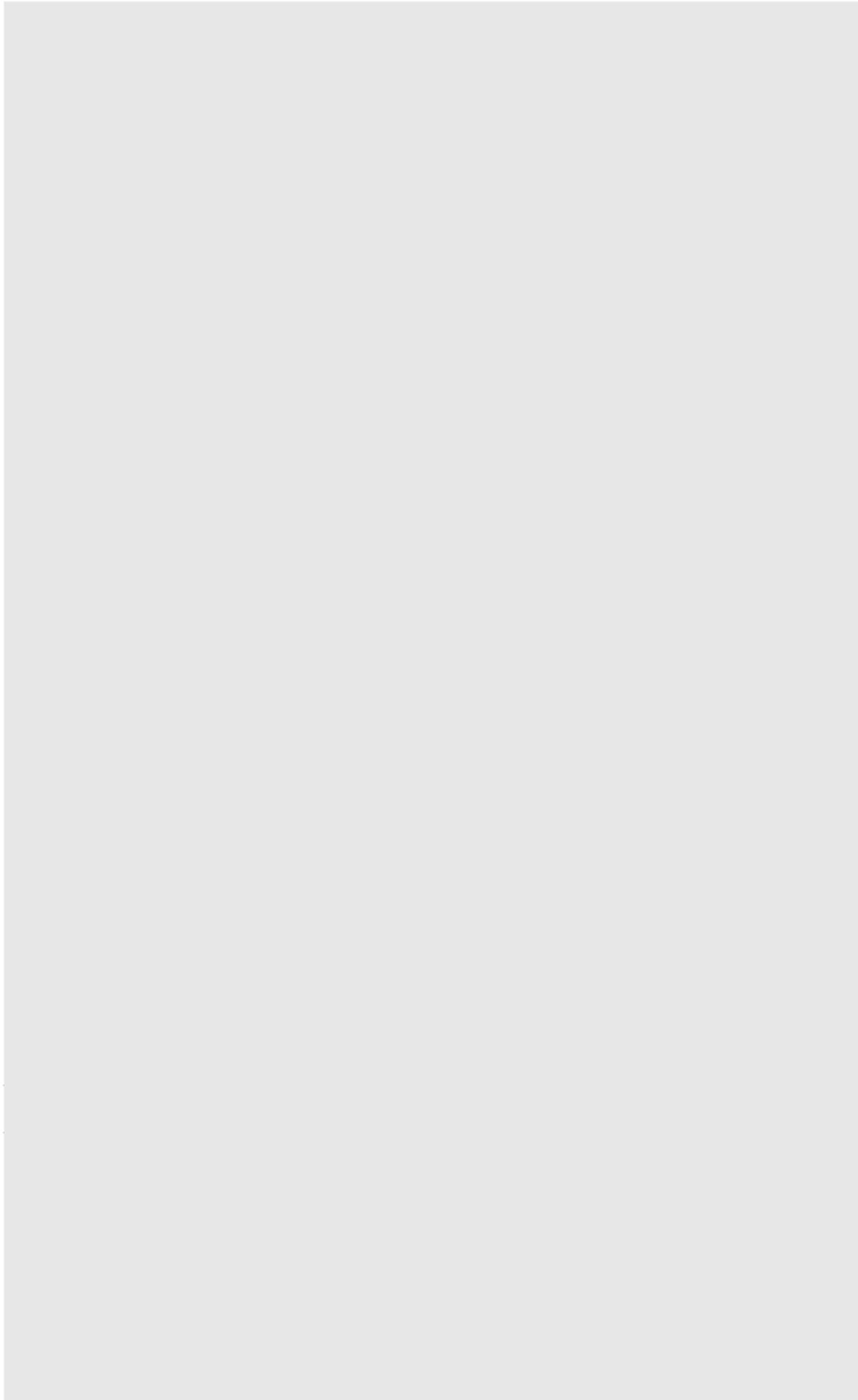


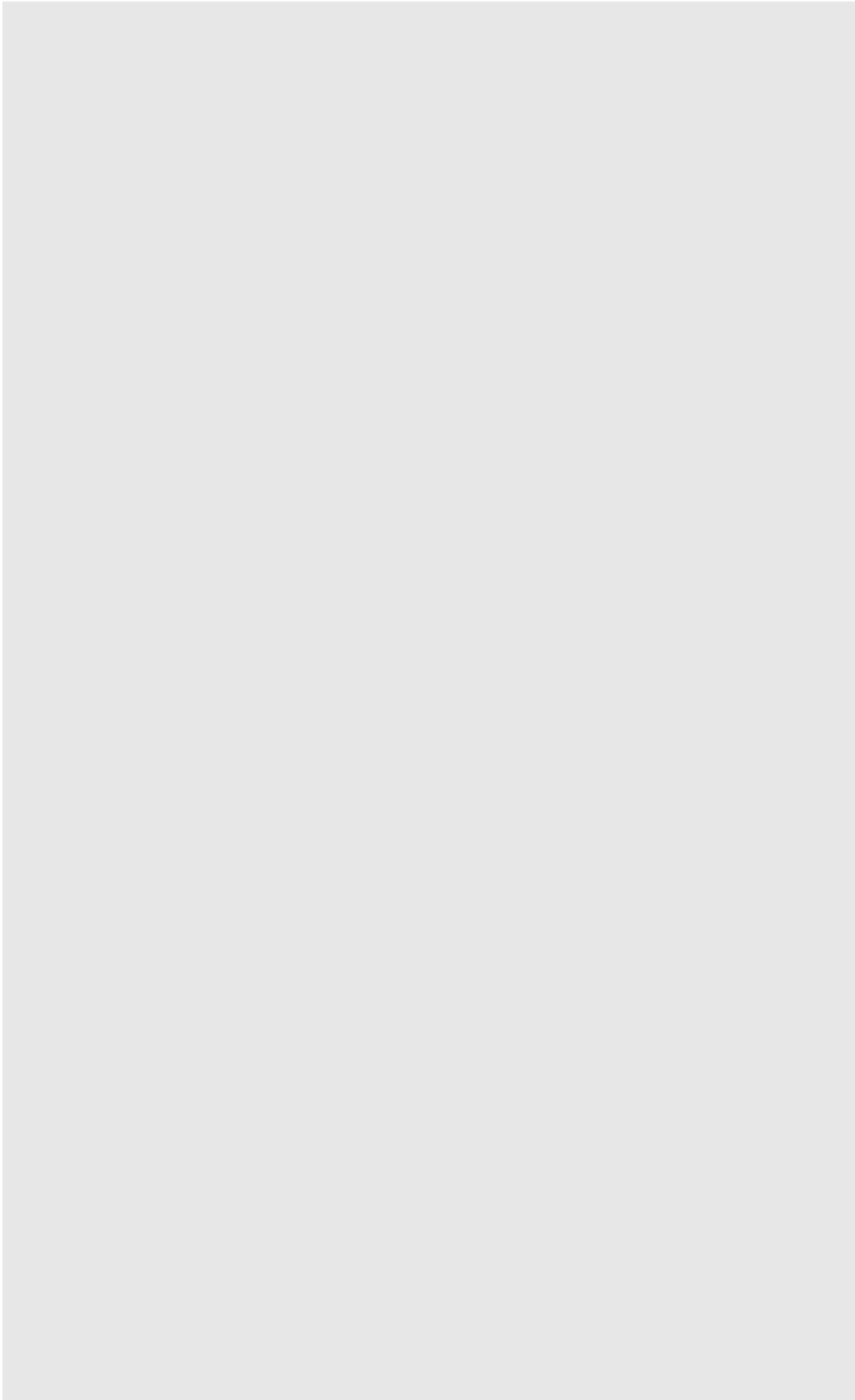


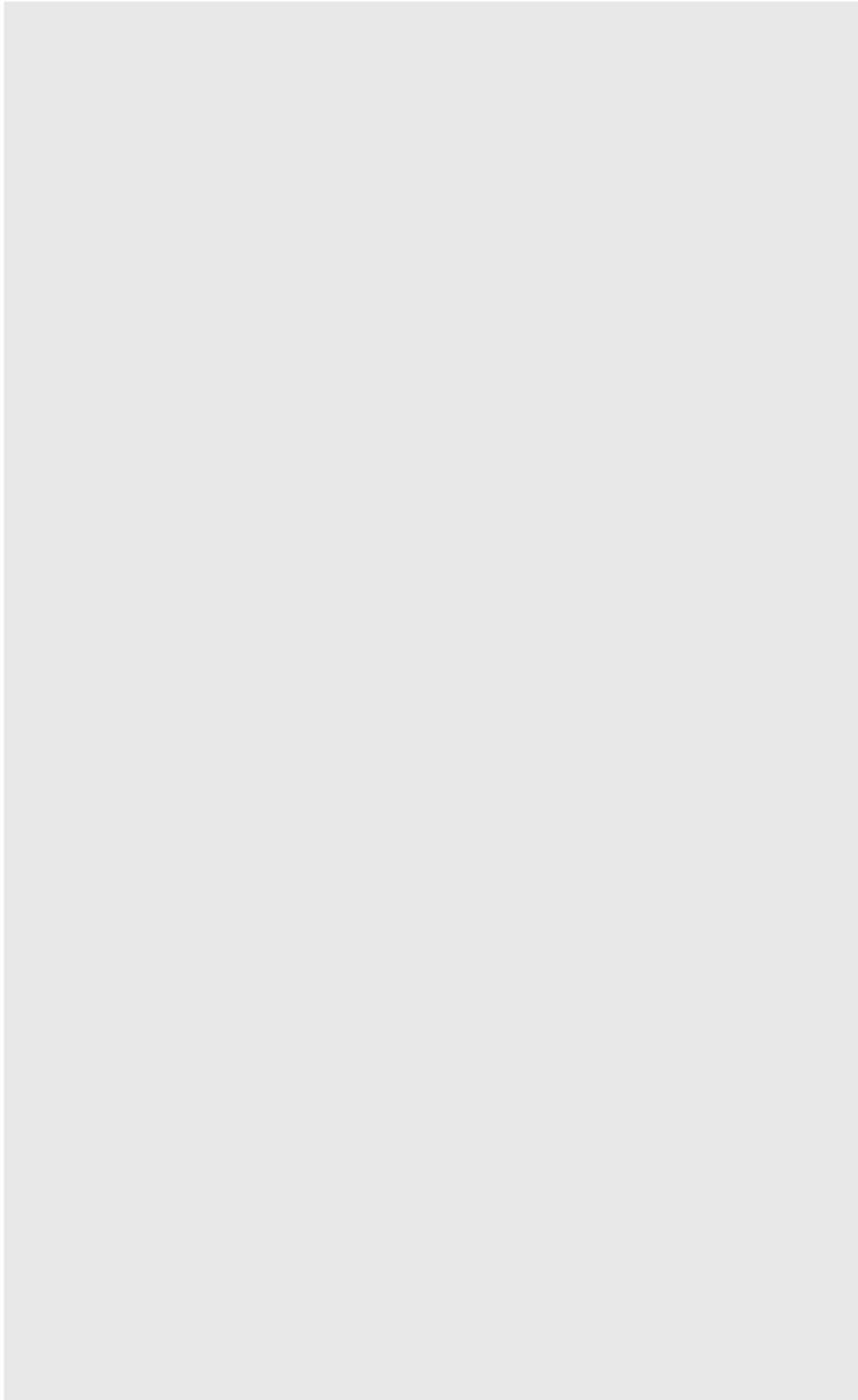


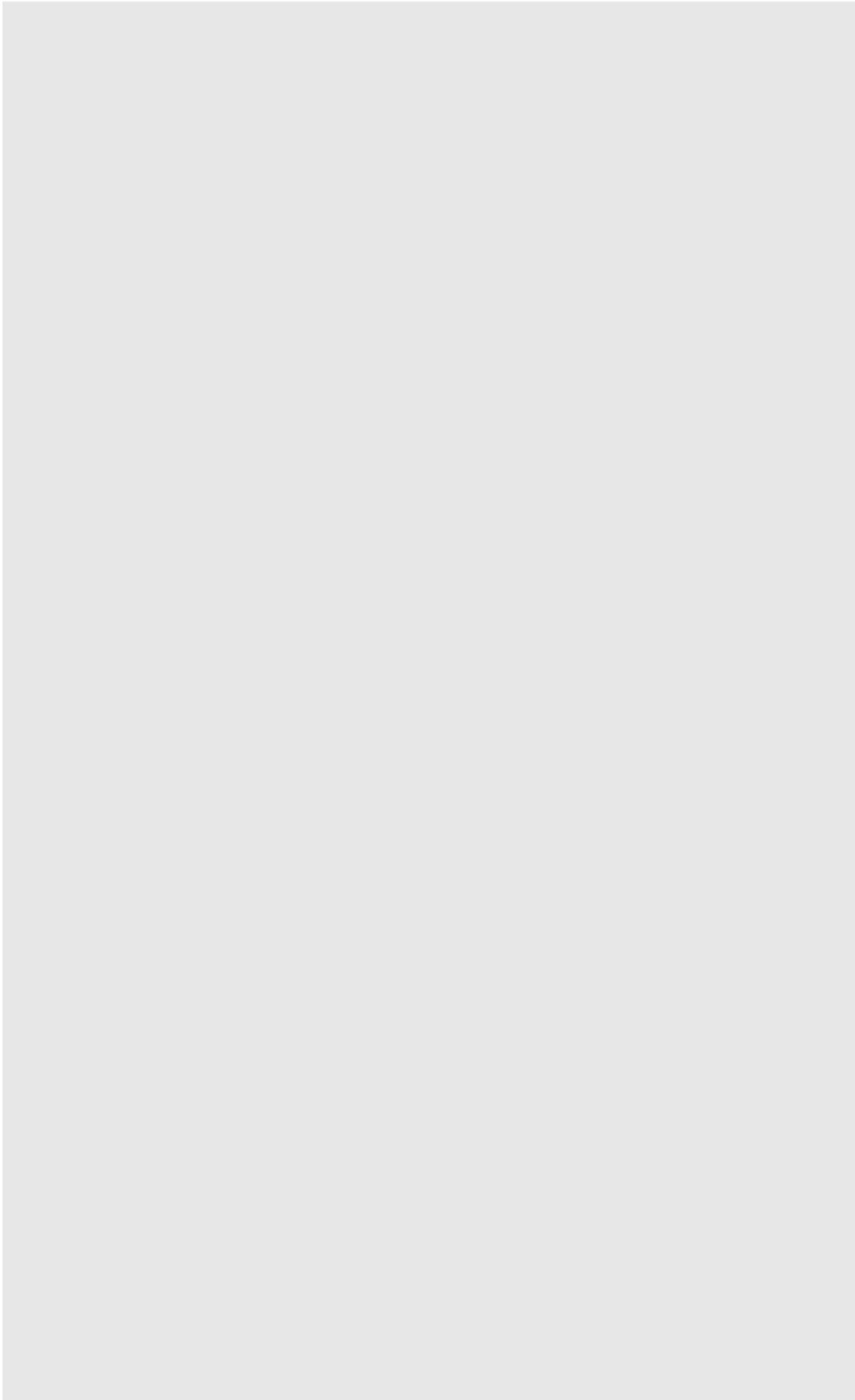


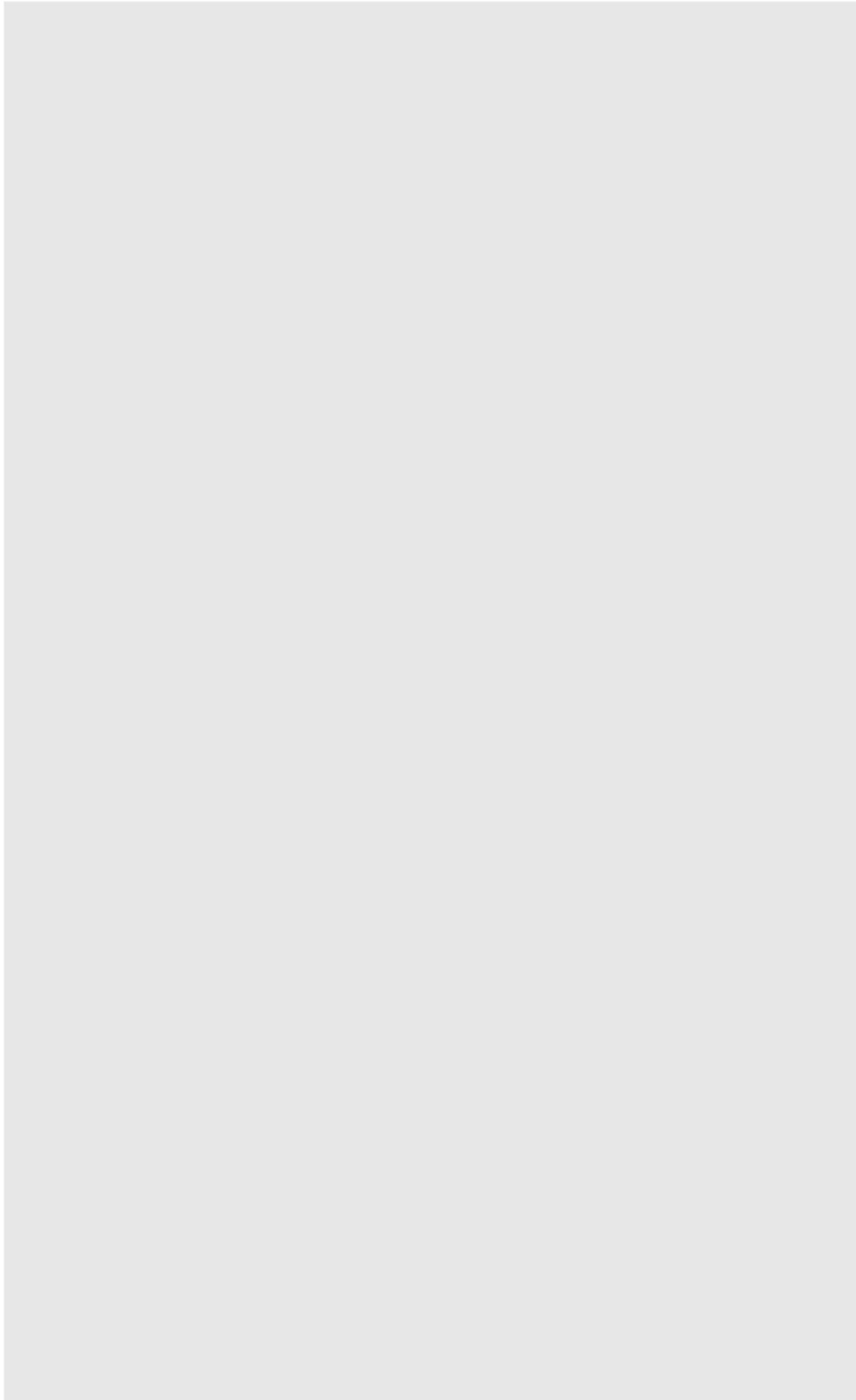


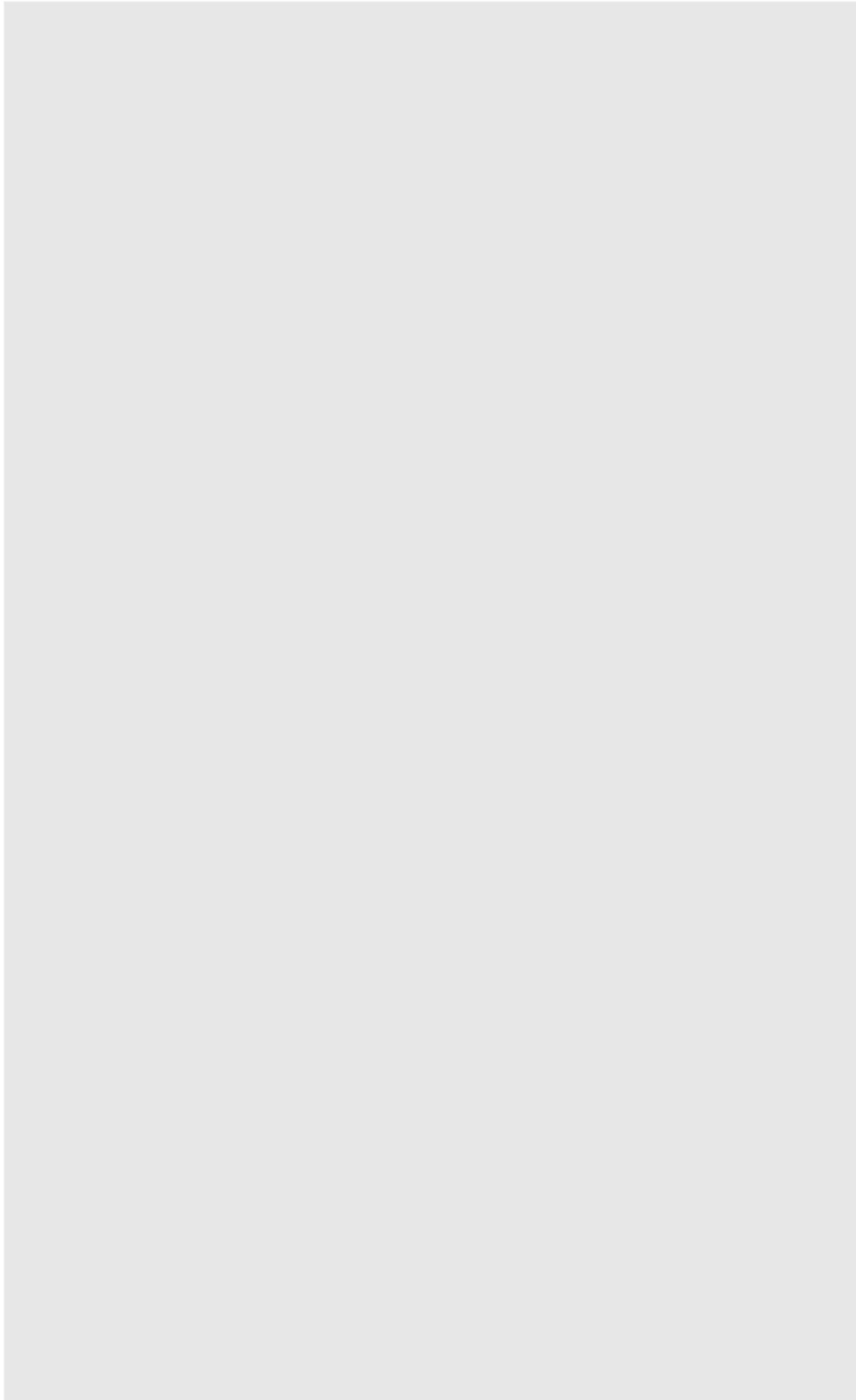


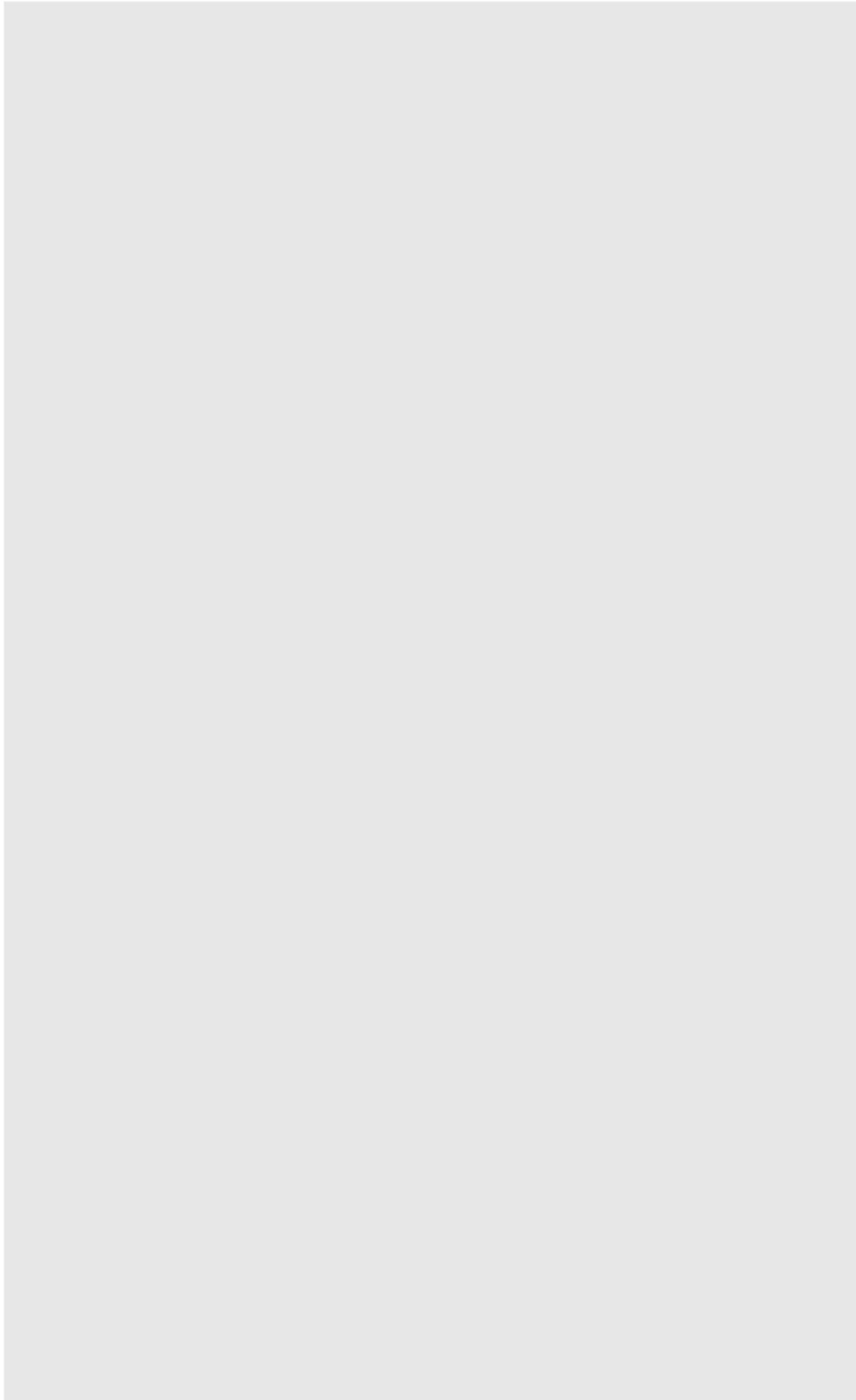


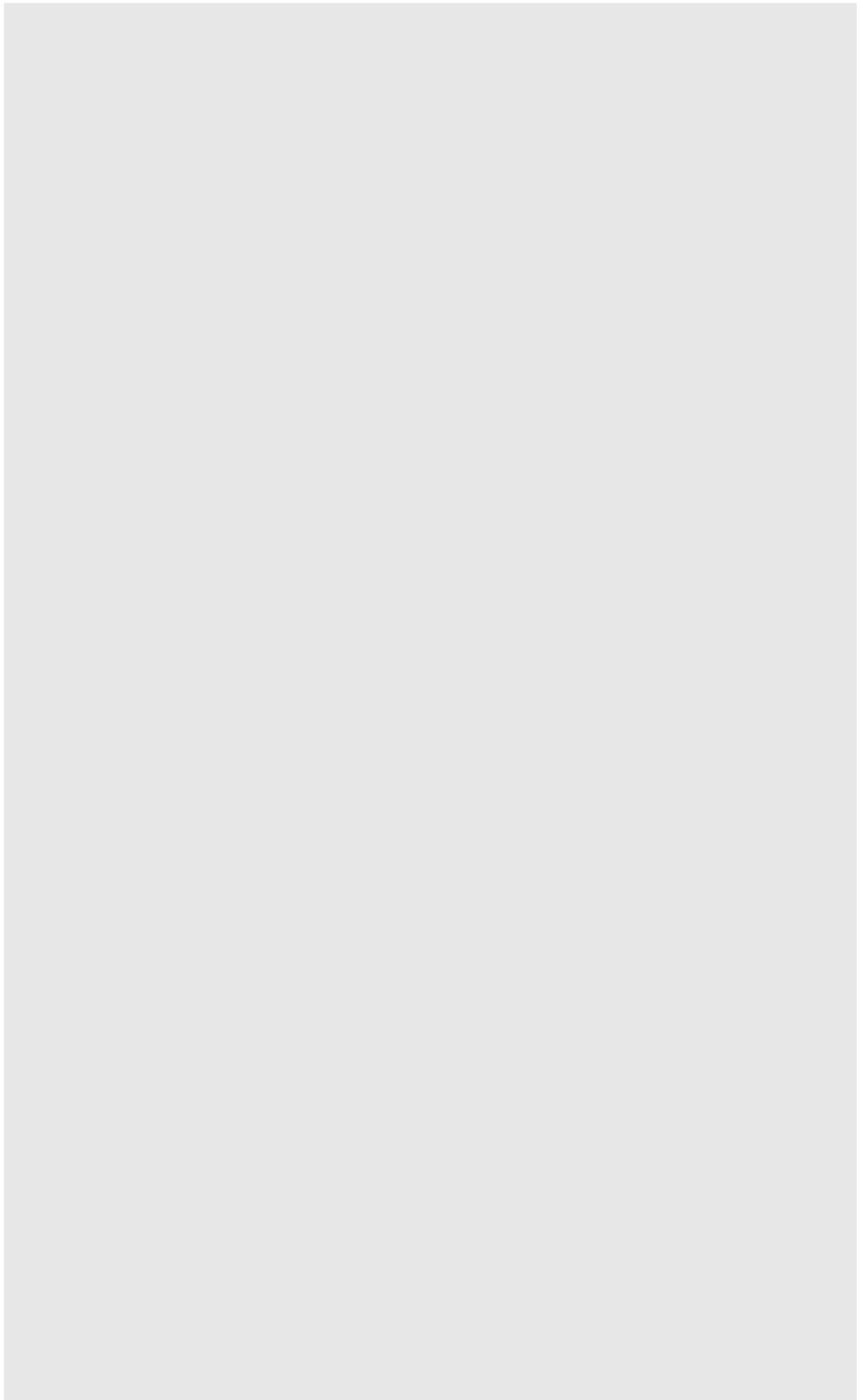


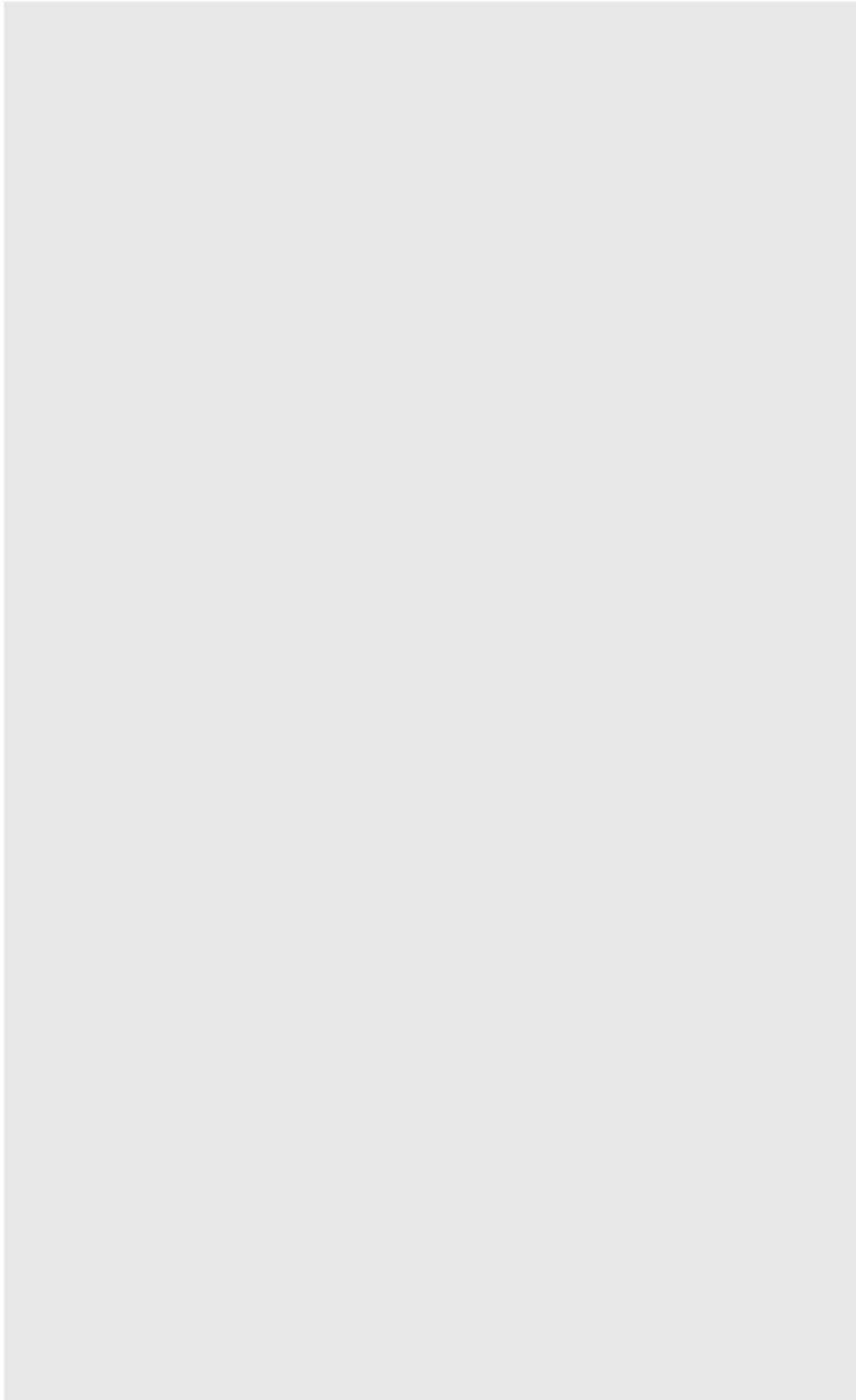


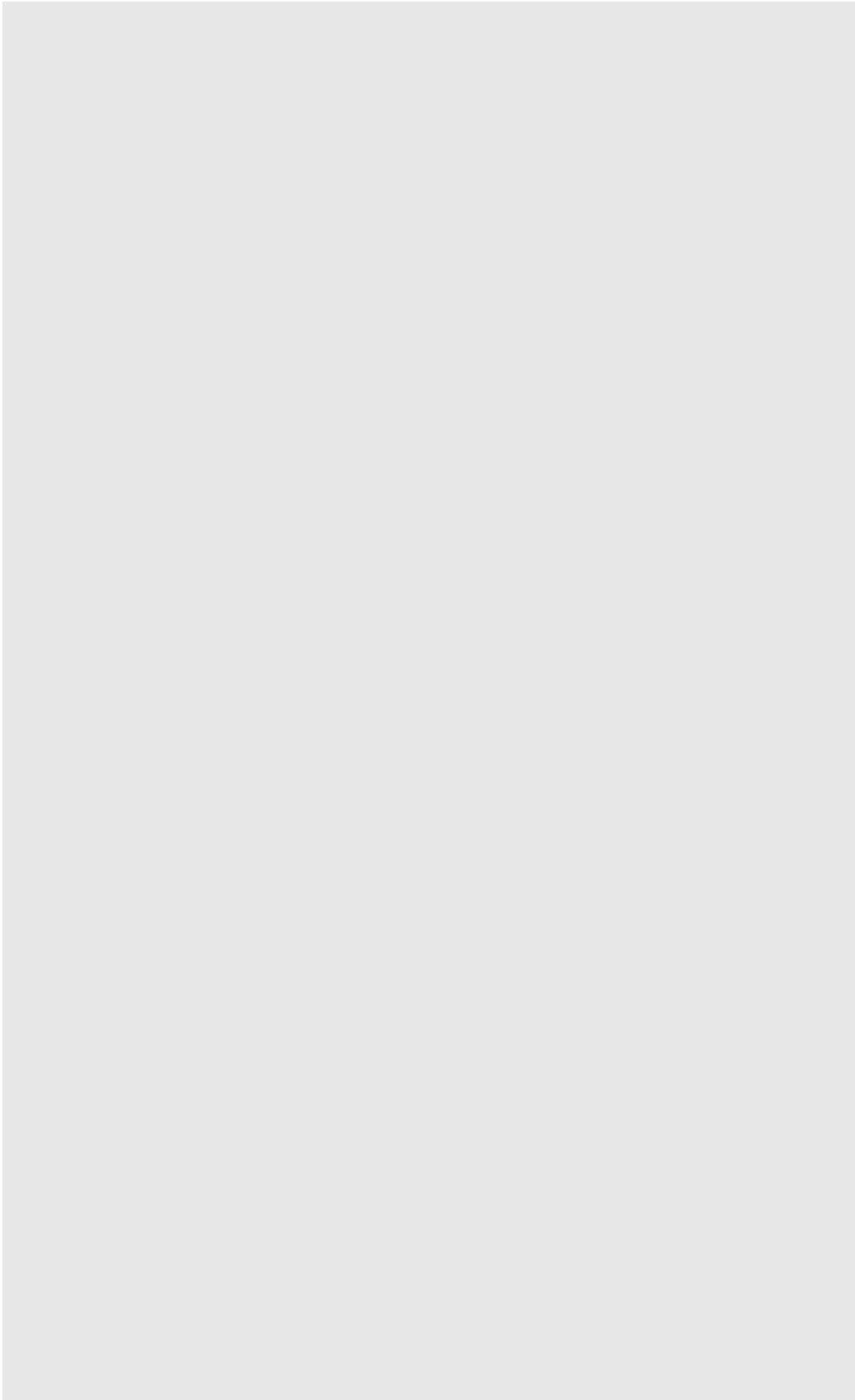


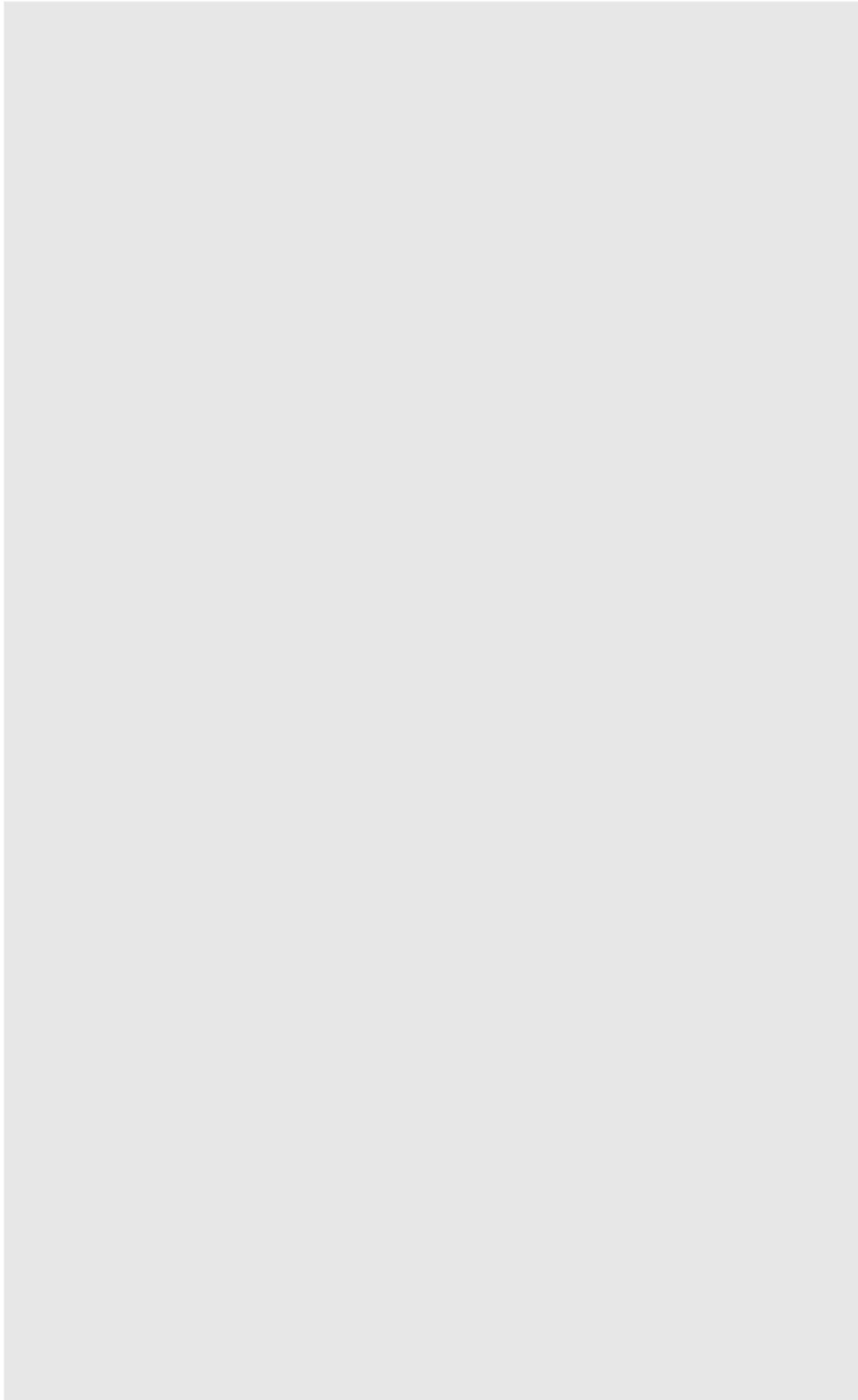


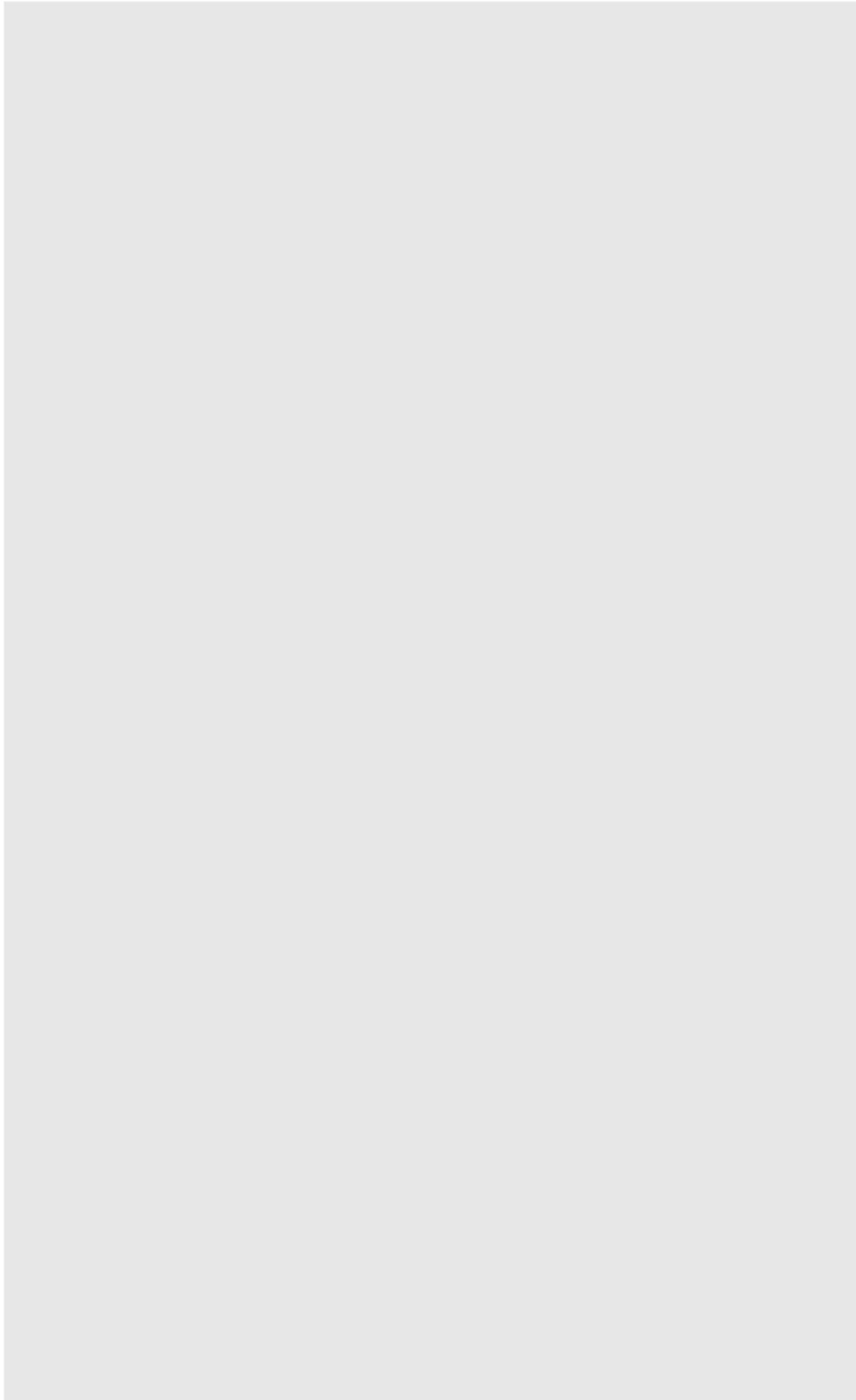


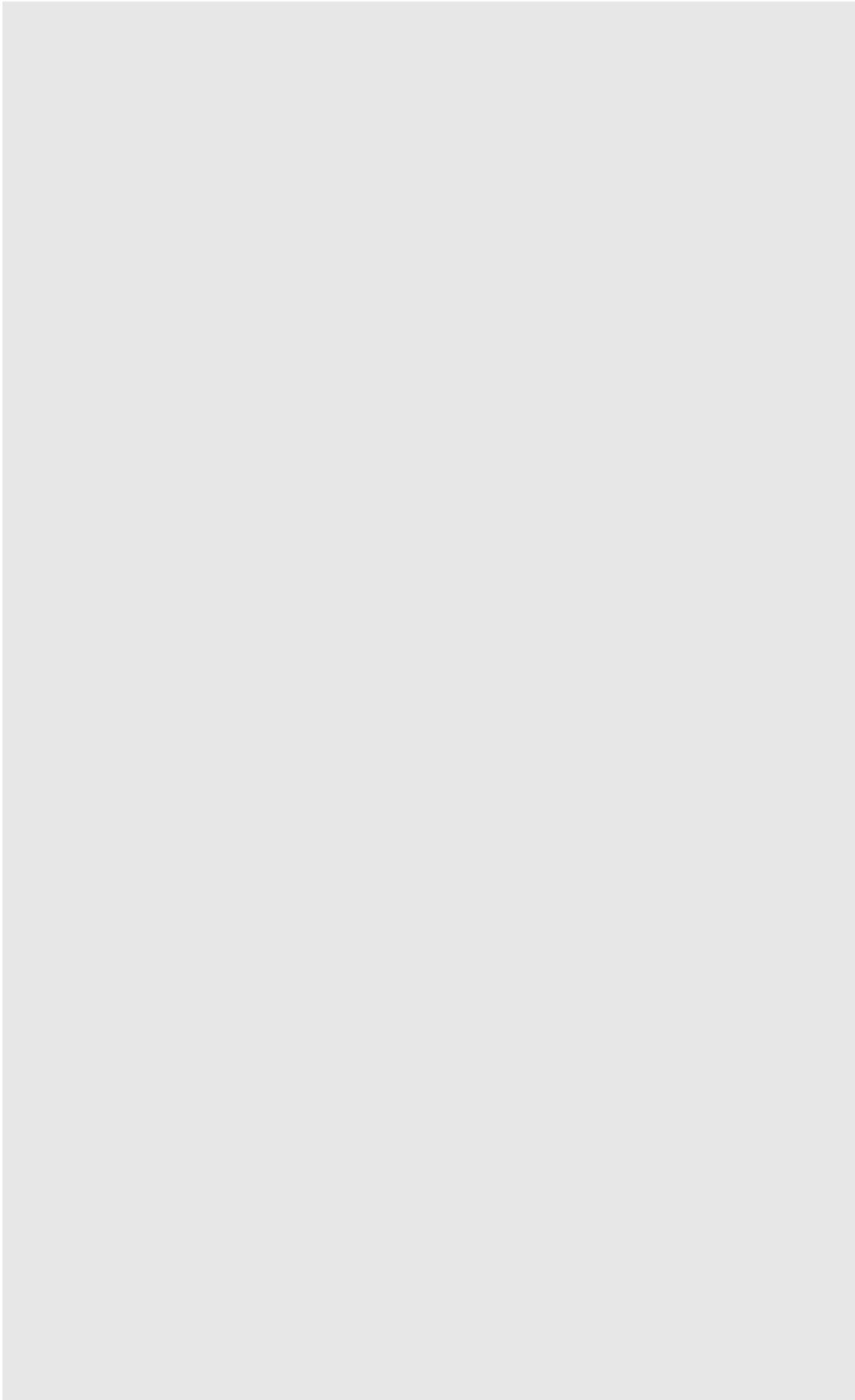


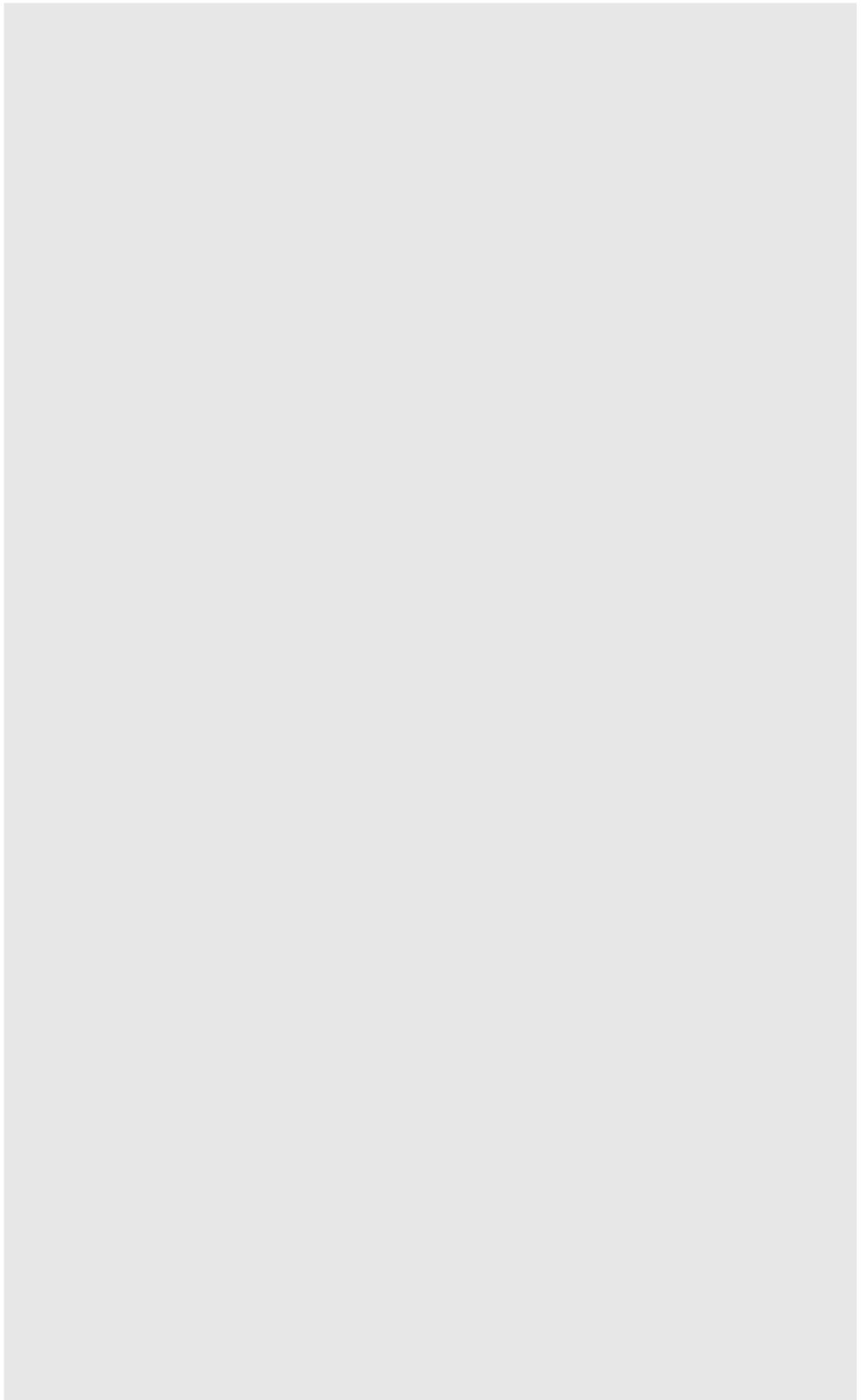


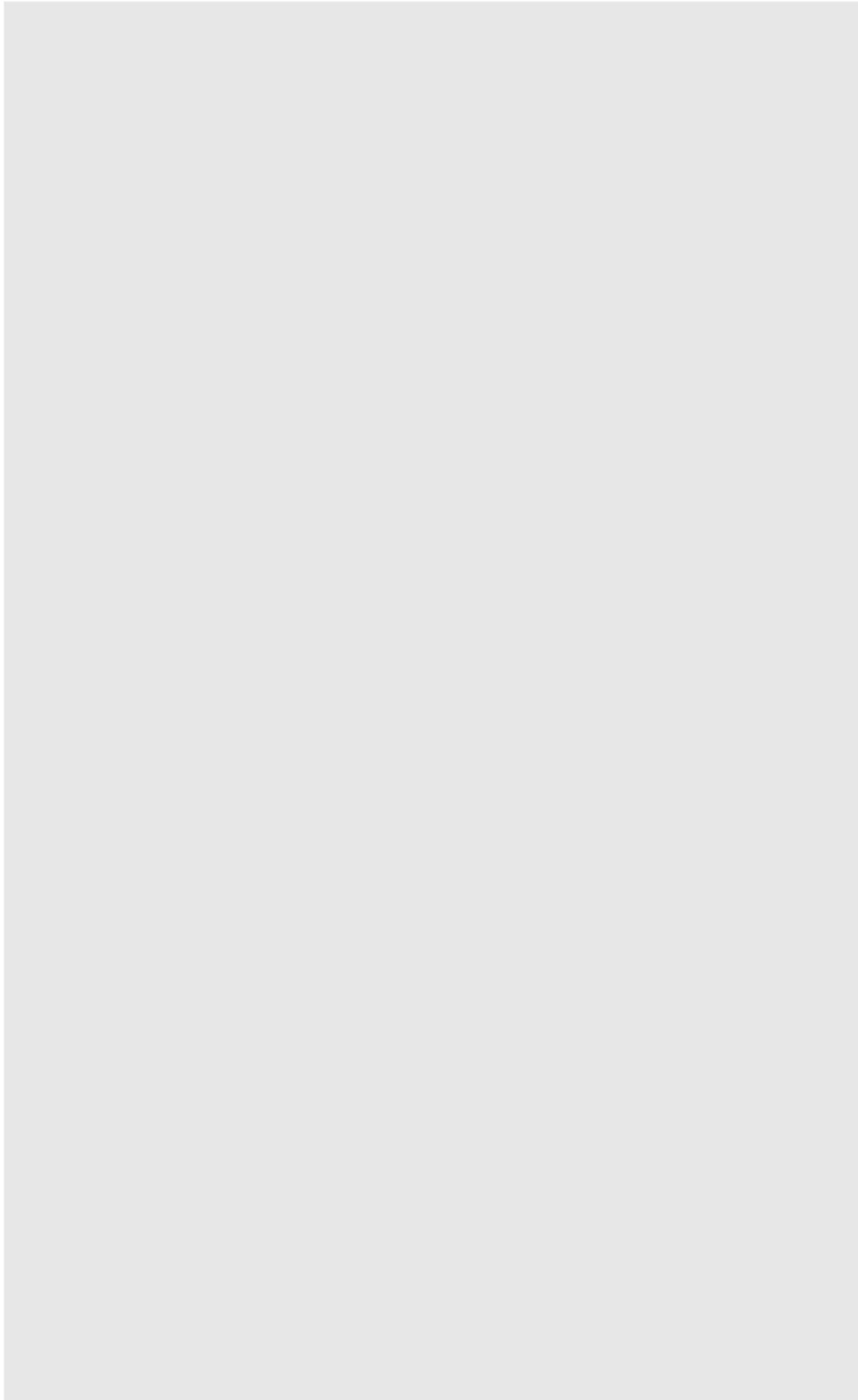


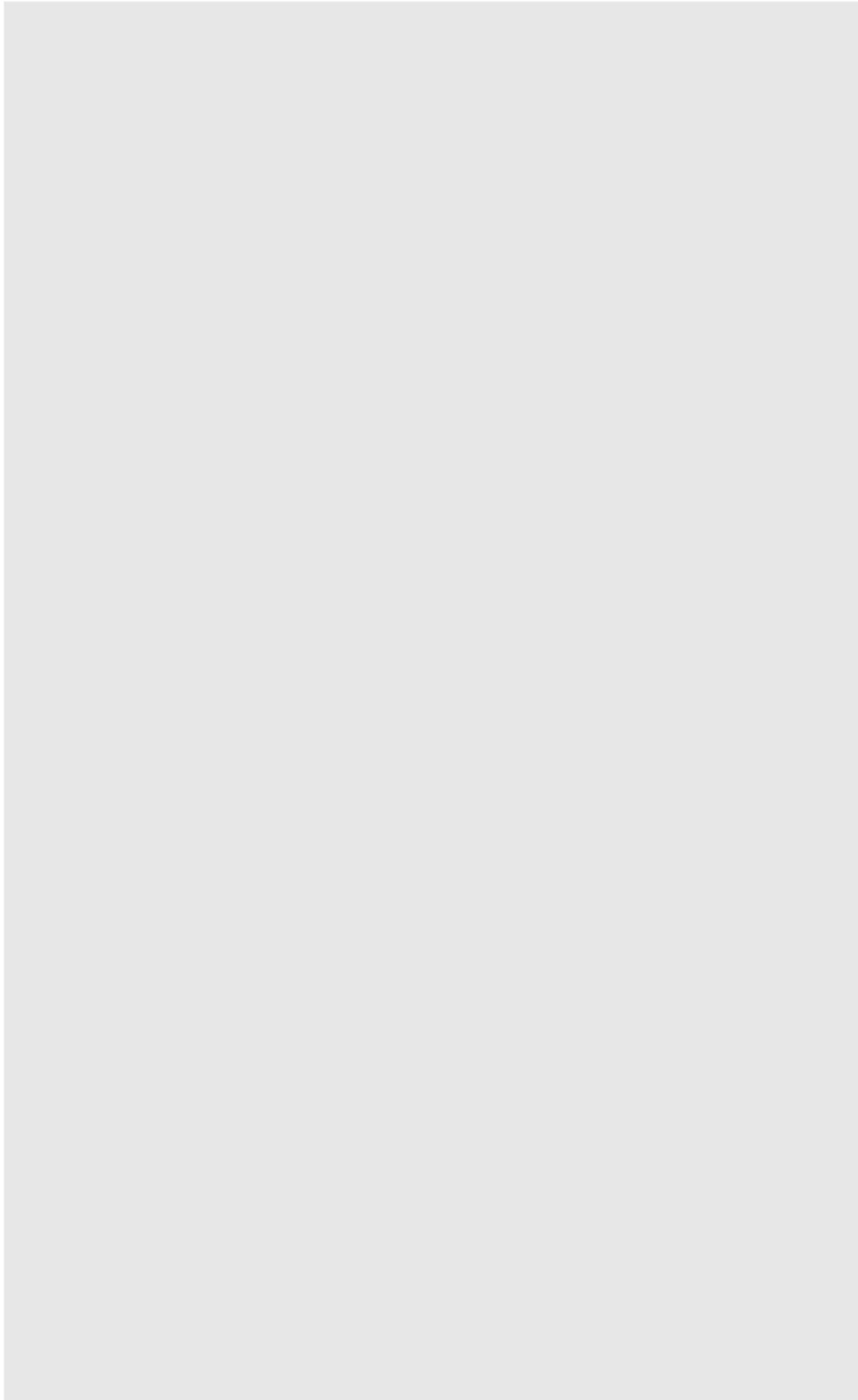


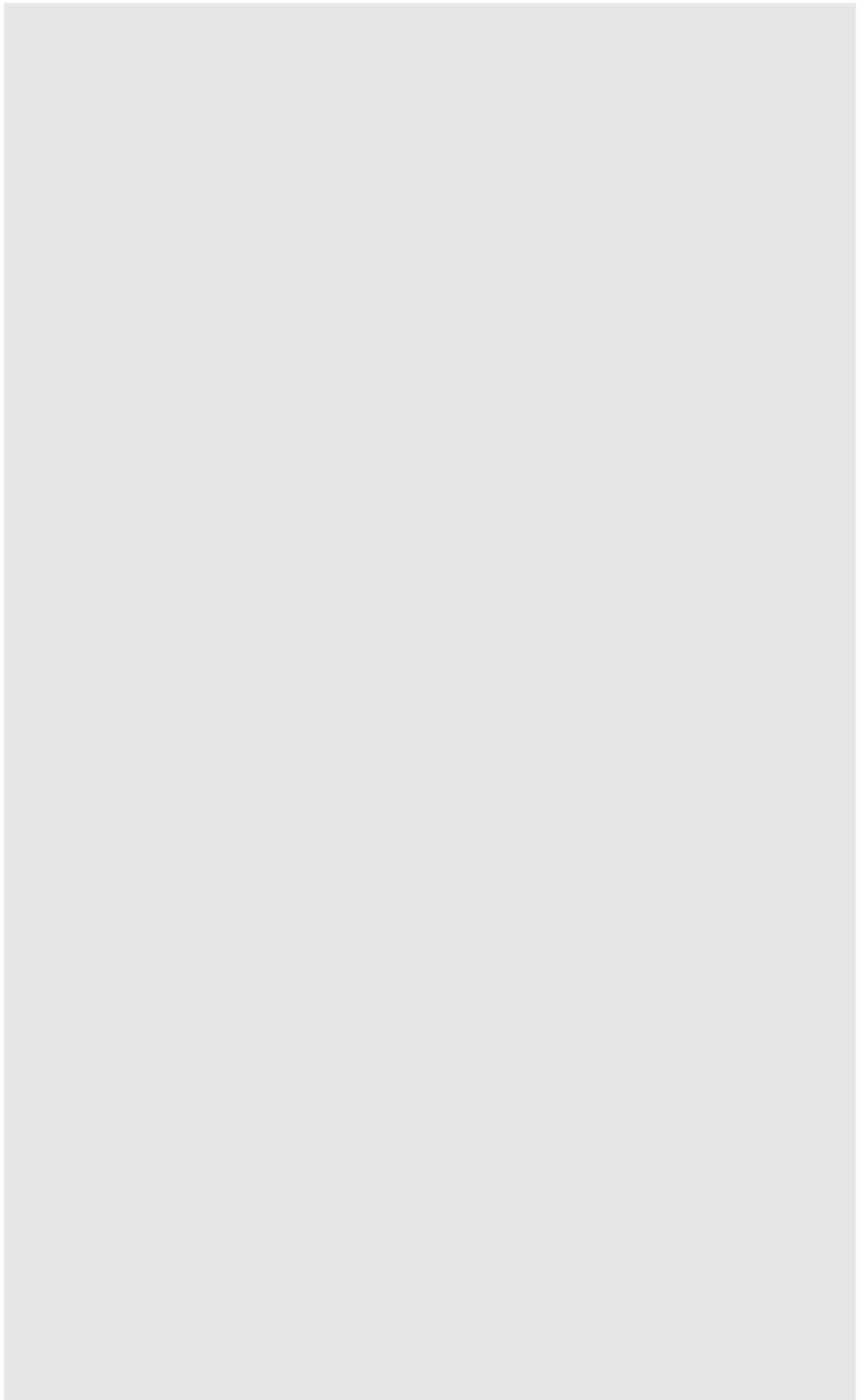


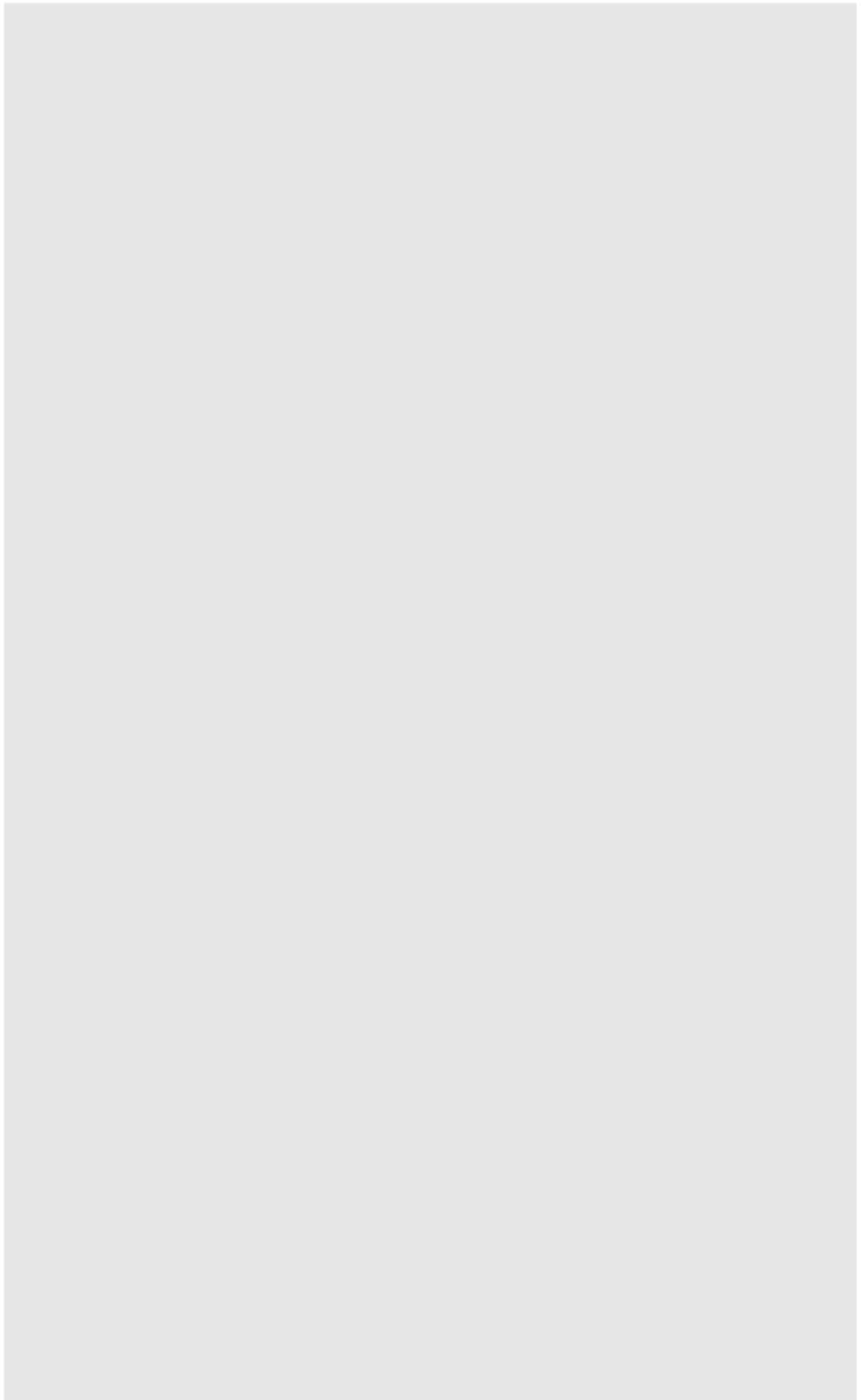


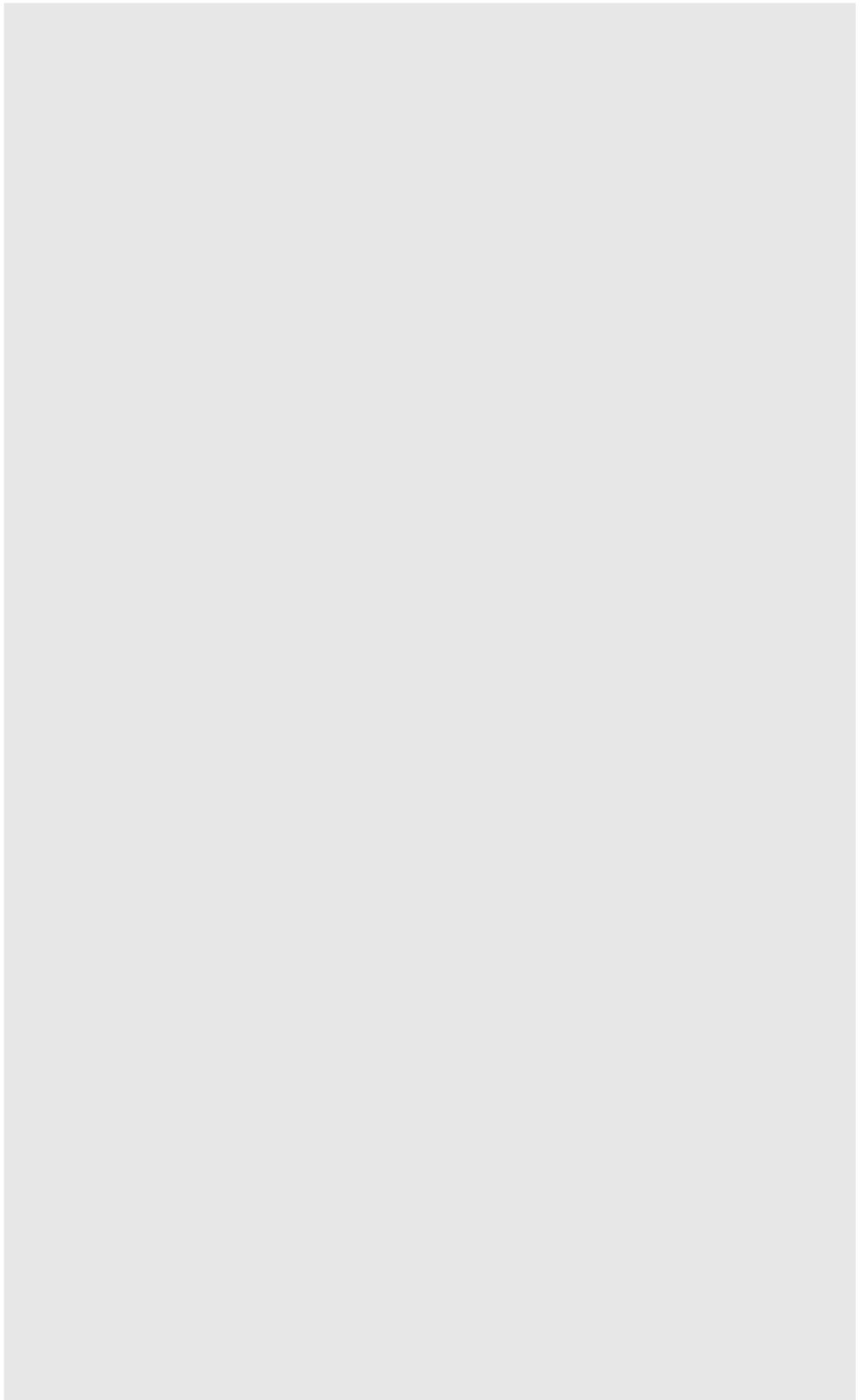


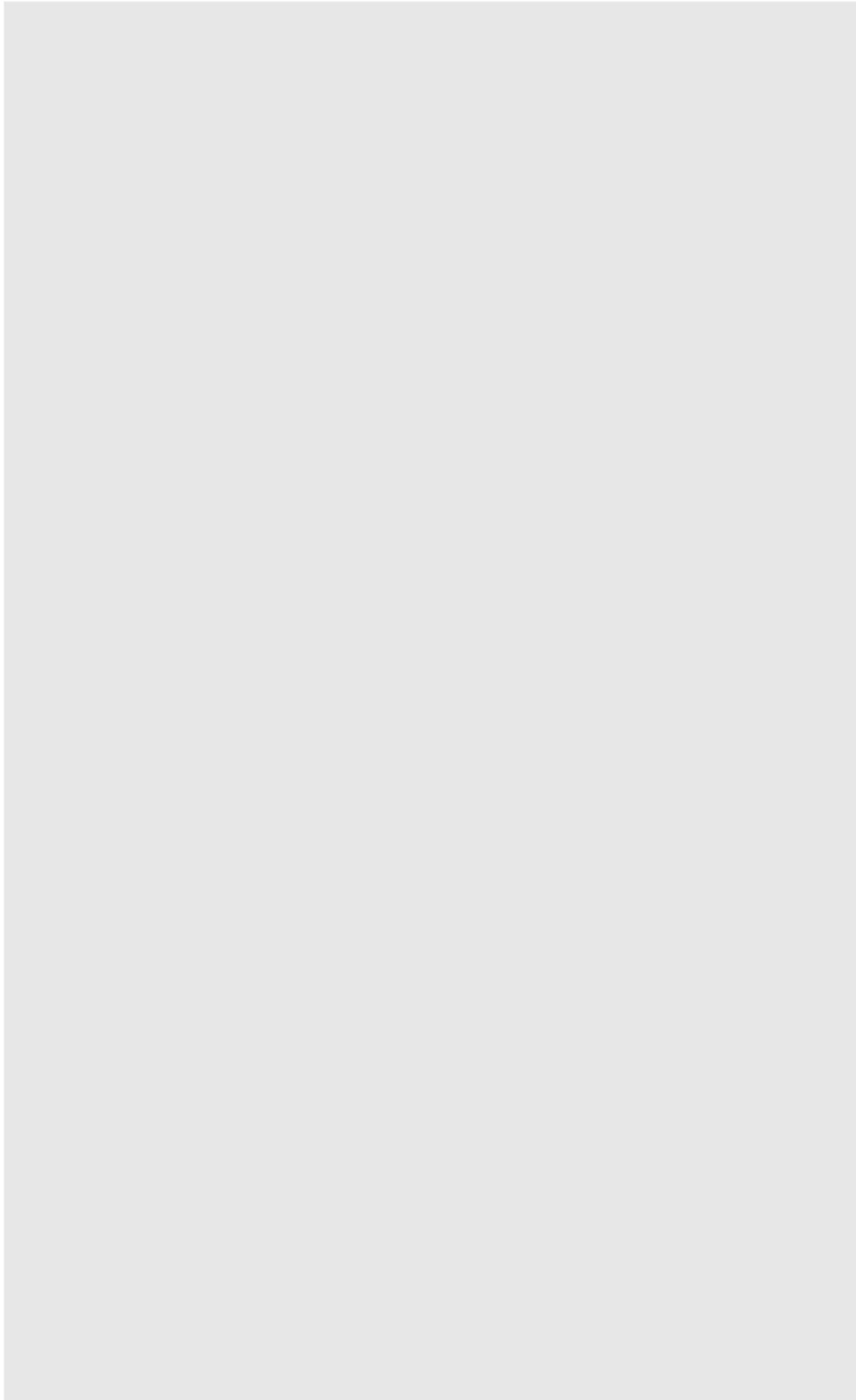


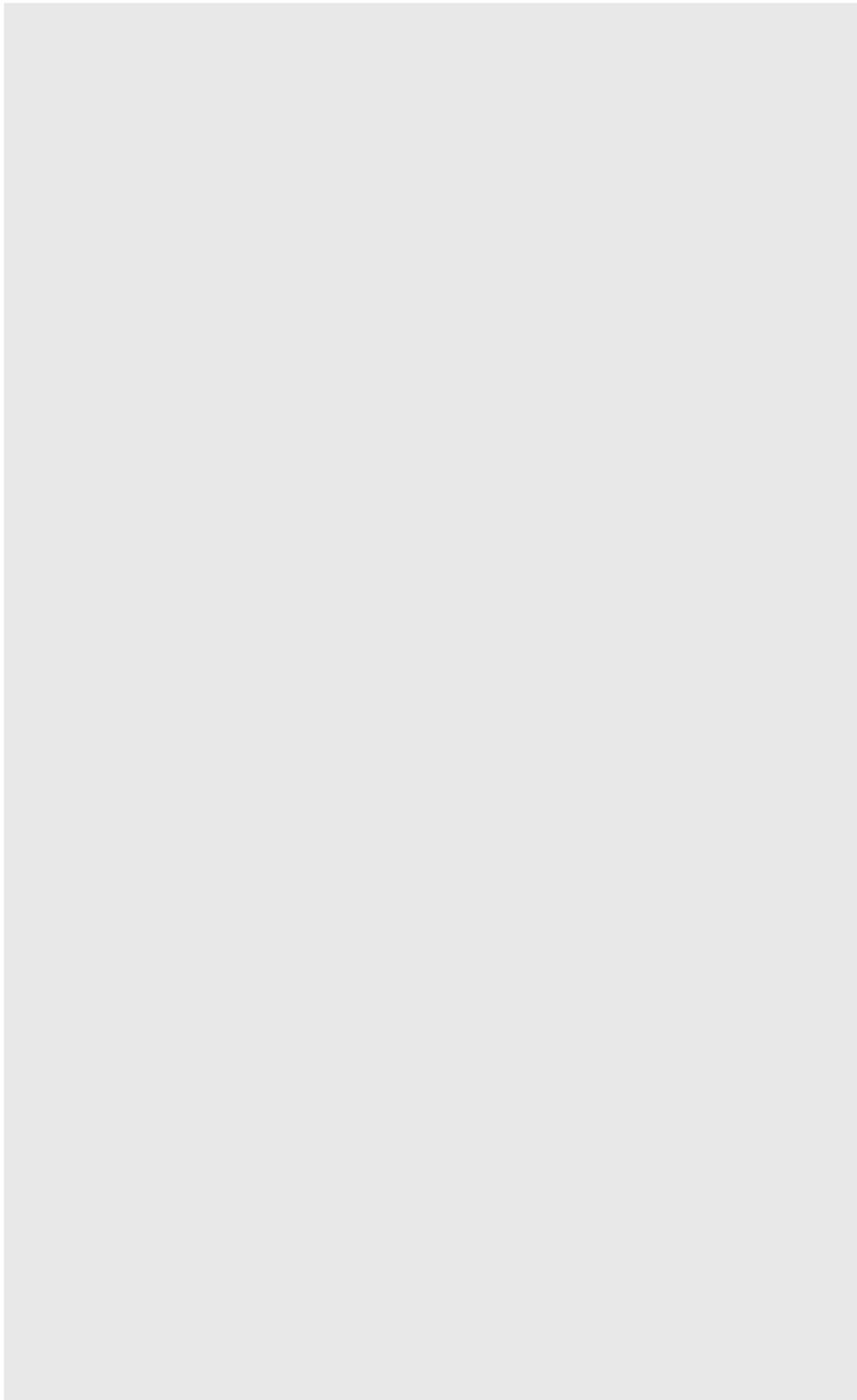


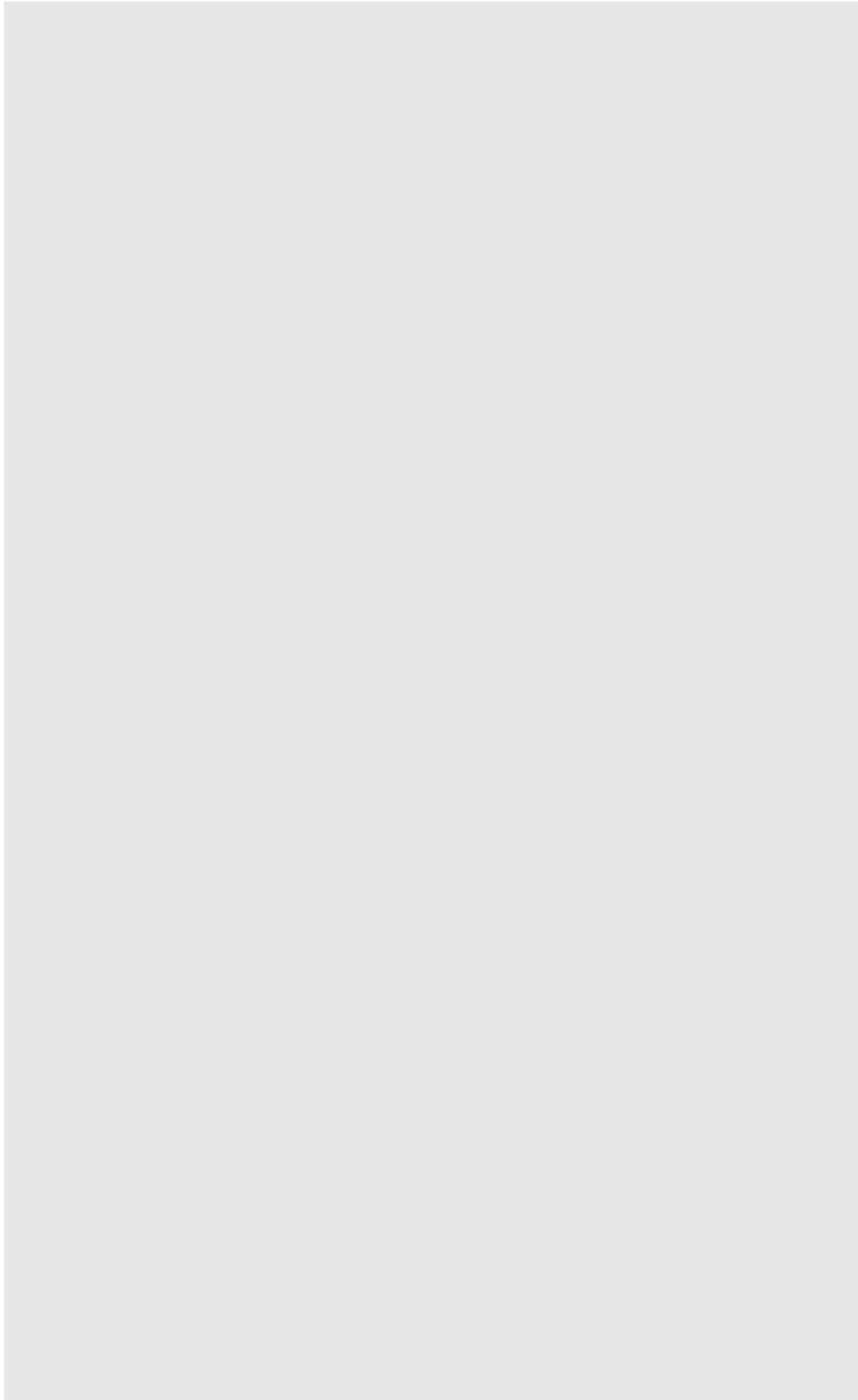


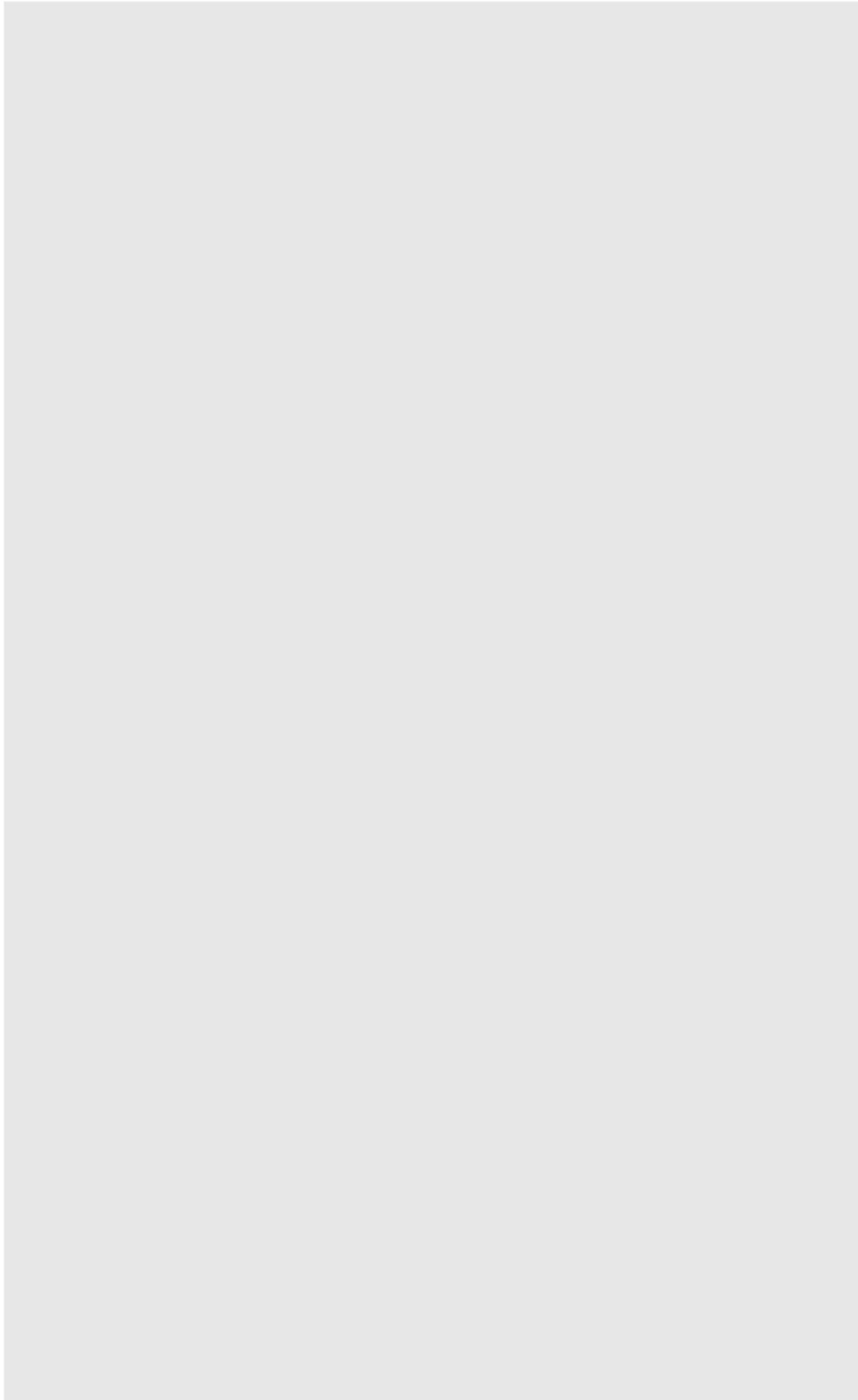


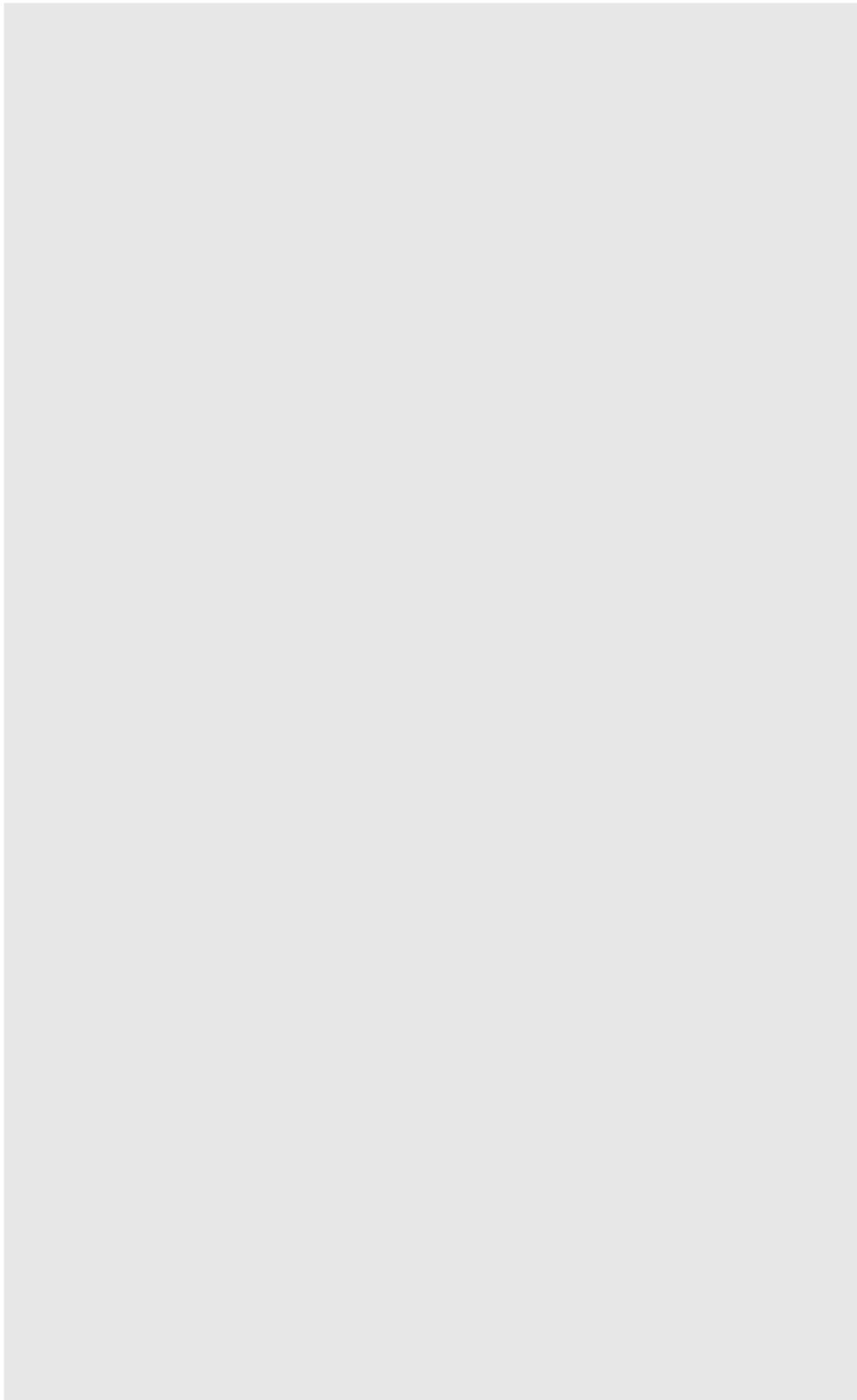


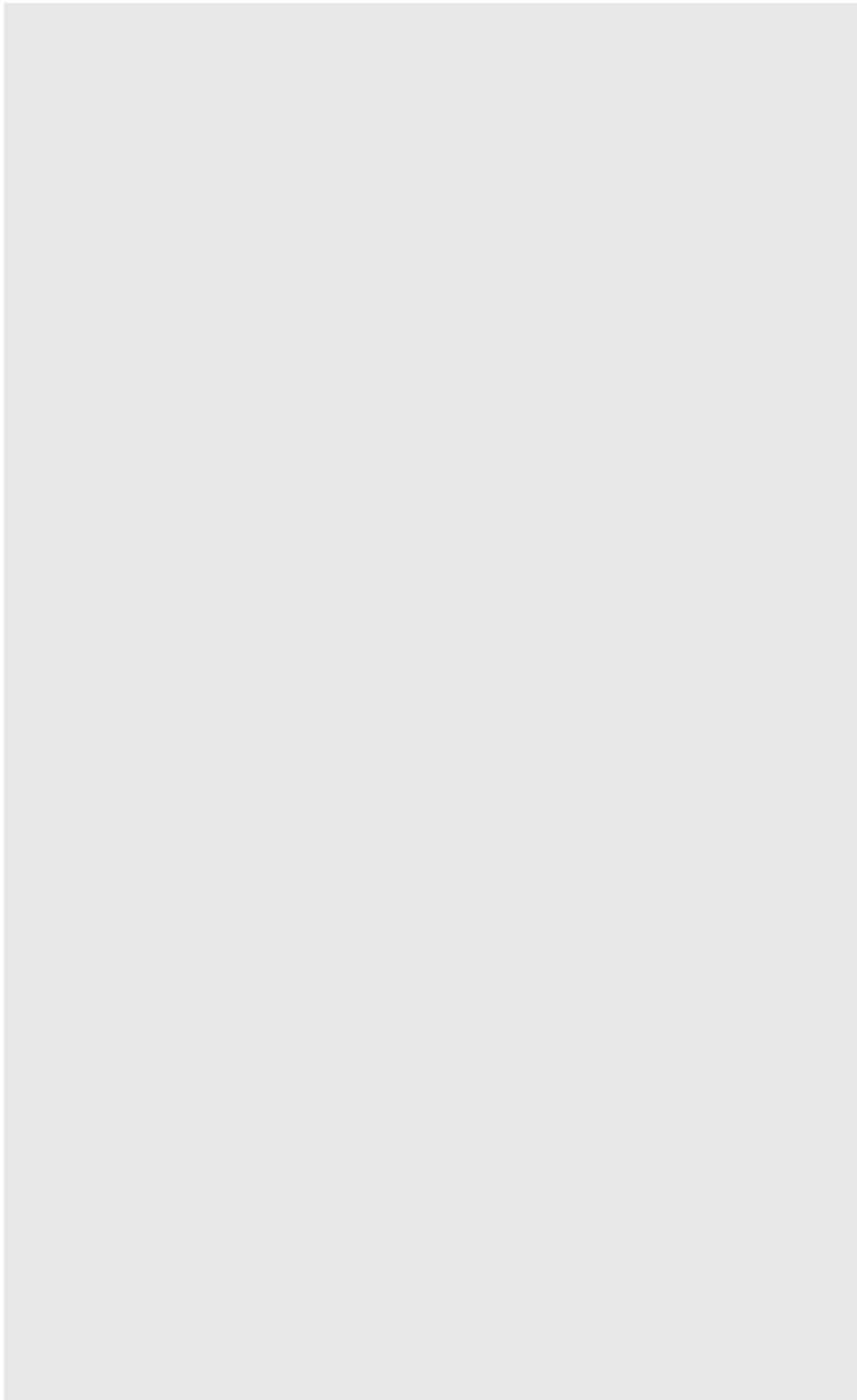


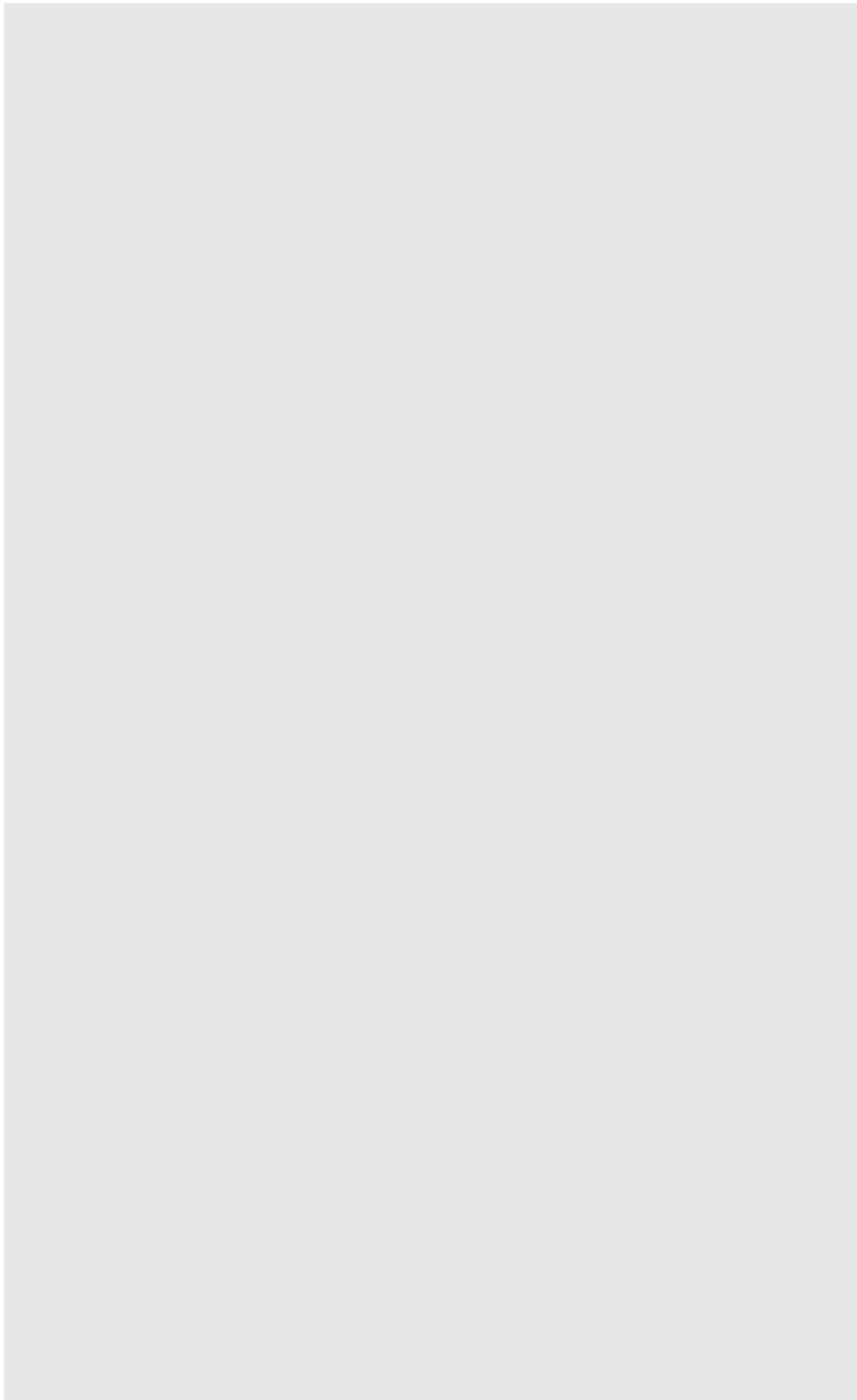


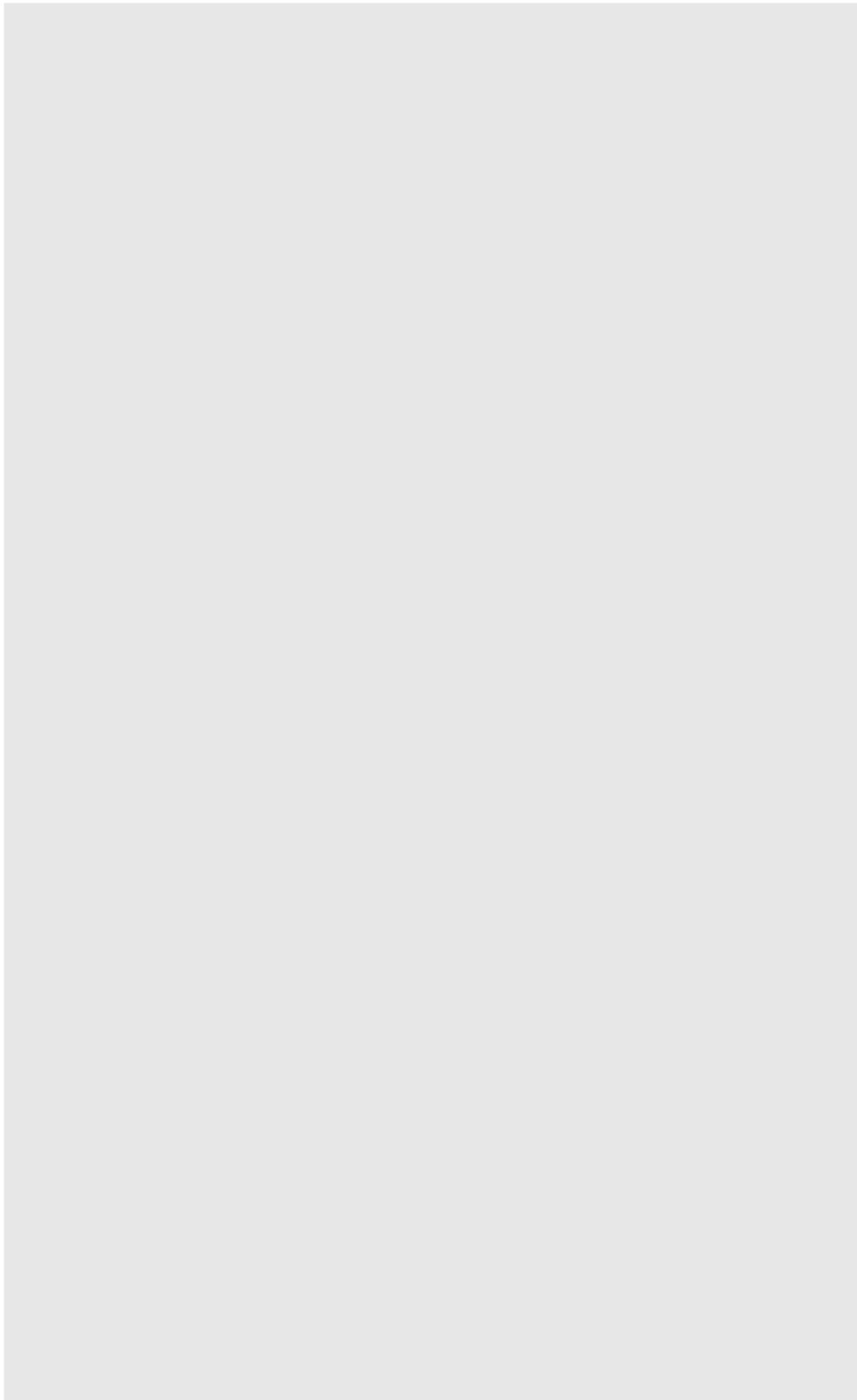


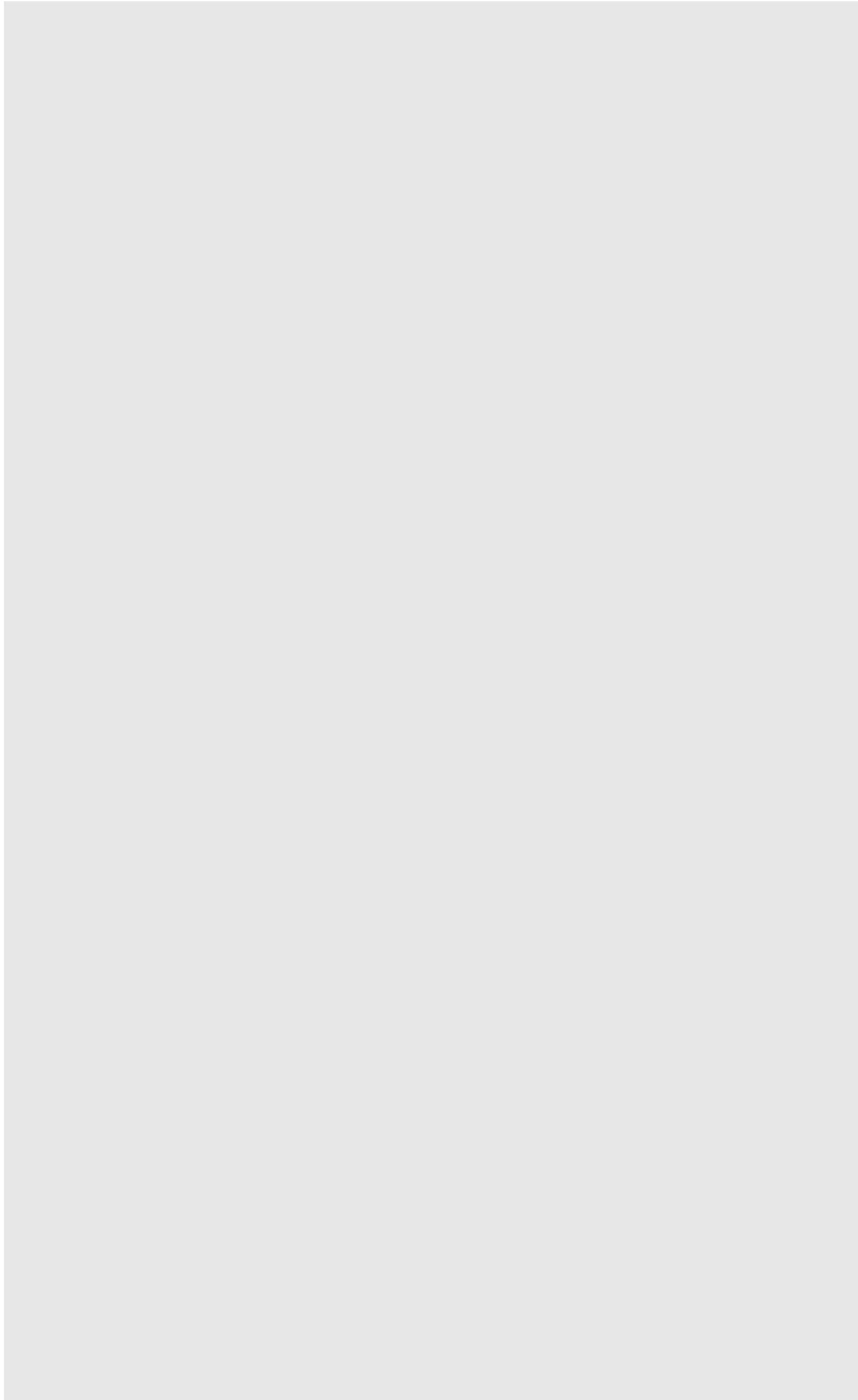












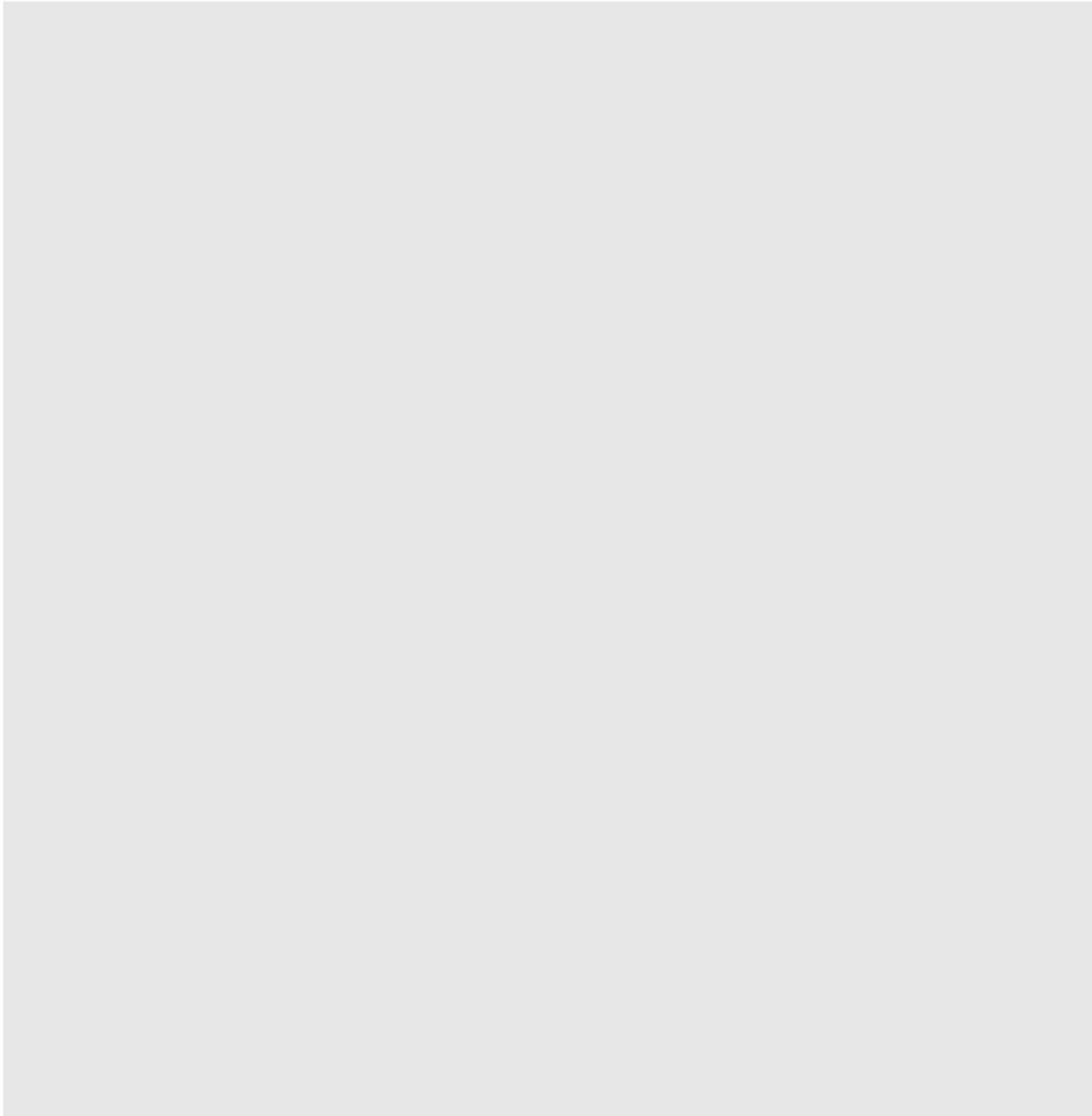
CONCLUSIONI

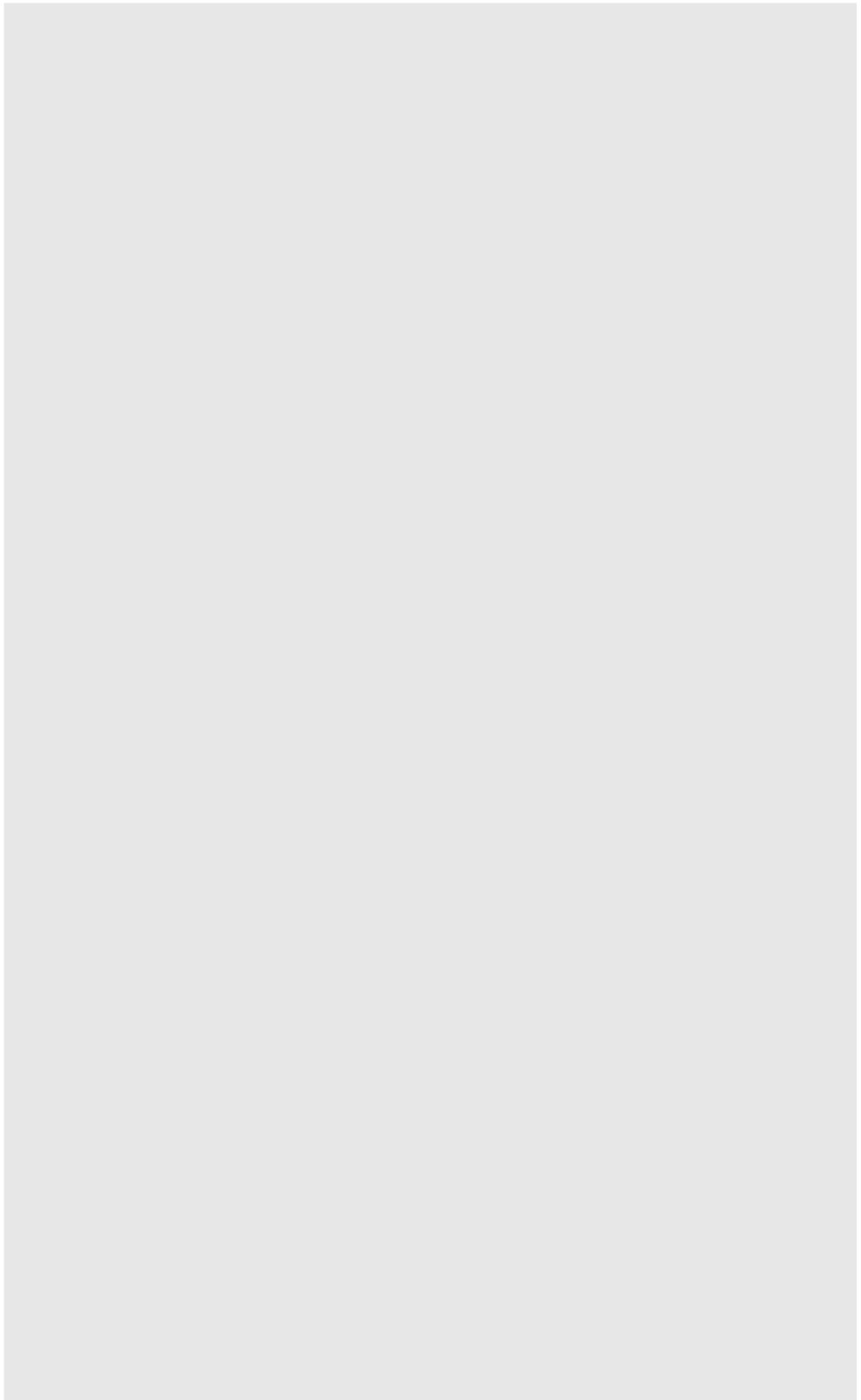
“Piaccia all’Ill.mo Tribunale adito, respinta ogni contraria istanza, eccezione e deduzione, in accoglimento del presente ricorso:

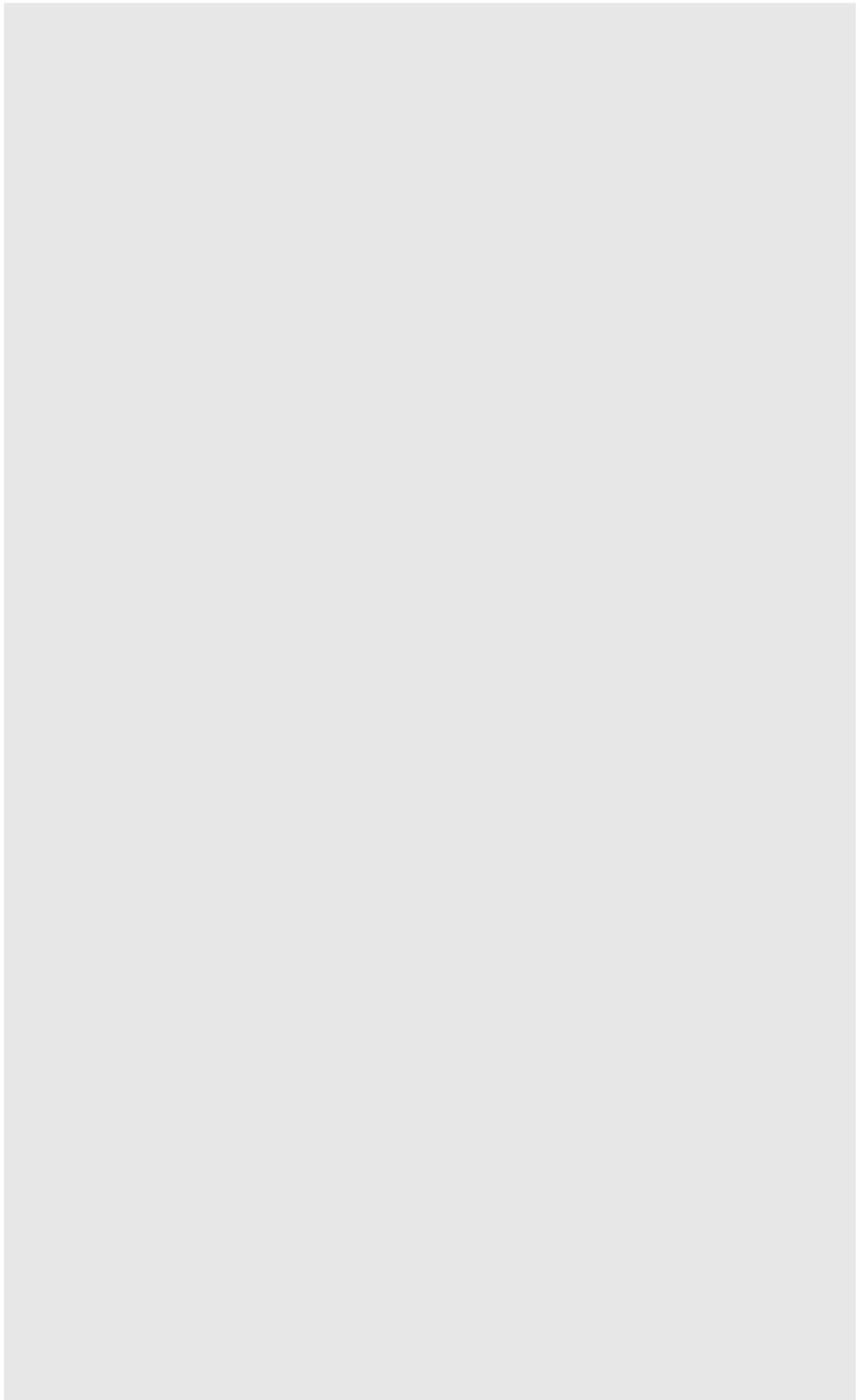
1) IN VIA PRINCIPALE: a) *accertare e dichiarare, con effetto costitutivo ex art. 63, c. 2, del T.U.P.I., il diritto della ricorrente ad essere inquadrata dal resistente come ‘PRIMO RICERCATORE-II LIVELLO’ a decorrere dal 30.12.2011, ovvero in subordine dal 24.10.2017, ovvero da altra data ritenuta utile; b) condannare il convenuto ad effettuare il predetto inquadramento giuridico ed economico da una delle suddette date e a effettuare la ricostruzione di carriera della ricorrente riconoscendo l’anzianità maturata nel II livello dalla data medesima e liquidando le differenze retributive spettanti, oltre interessi legali; 2) IN VIA SUBORDINATA: a) *accertare e dichiarare il diritto della ricorrente al risarcimento del danno per perdita di chance; b) condannare il convenuto ad effettuare il predetto inquadramento giuridico ed economico come sopra indicato e a effettuare la ricostruzione di carriera della ricorrente riconoscendo l’anzianità maturata nel II livello dalla data medesima e liquidando le differenze retributive spettanti, oltre interessi legali. 3) IN VIA ULTERIORMENTE SUBORDINATA: a) *accertare e dichiarare il diritto della ricorrente al risarcimento del danno per perdita di chance; b) condannare il convenuto alla liquidazione del danno per***

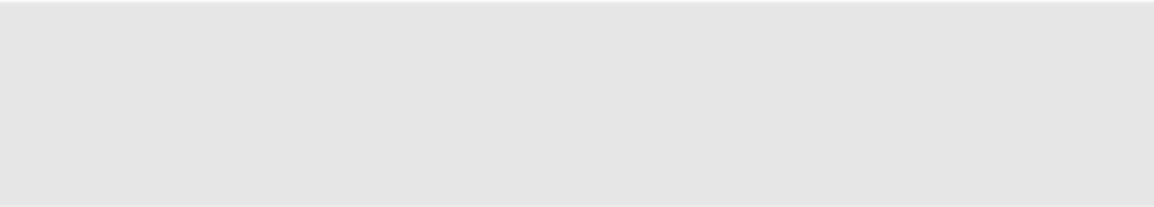
equivalente, pari al 50% delle differenze retributive spettanti, fra inquadramento al II livello e inquadramento al III livello, decorrenti dal 30.12.2011, ovvero dal 24.10.2017, ovvero da altra data ritenuta utile, fino alla data di cessazione dal servizio, ovvero fino alla data del possibile inquadramento nel II livello per effetto di superamento di un nuovo concorso, interno o esterno. Con vittoria di spese e compensi del presente giudizio, oltre spese generali, IVA e CPA, e rimborso del contributo unificato, da distrarsi a favore del sottoscritto avvocato, che si dichiara a tal fine antistatario”.

SI DEPOSITA:









Roma, 20 febbraio 2021

Avv. Giuseppe Pio Torcicollo