

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
Plaintiff,	)	Case No. 4:04CV846 CAS
	)	
and	)	
	)	
AHMET DEMERELLI	)	
Plaintiff-Intervener,	)	
	)	
vs.	)	Jury Trial Demanded
	)	
CONVERGYS CUSTOMER MANAGEMENT	)	
GROUP, INC.,	)	
Defendant.	)	

**PLAINTIFF-INTERVERNER’S MOTION TO INTERVENE**

COMES NOW Plaintiff, by and through counsel, and for his Plaintiff-Intervener’s Motion to Intervene states to the Court as follows:

1. Plaintiff is an indispensable party to this action.
2. Plaintiff filed a timely Charge of Discrimination with the Equal Employment Opportunity Commission alleging that Defendant engaged in the discriminatory actions that are being raised in this lawsuit, or alternatively, the allegations of Plaintiff’s lawsuit would have arisen from the investigation of Plaintiff’s Charge of Discrimination.
3. Plaintiff has fulfilled all conditions precedent to the bringing of this claim and has duly exhausted all administrative procedures in accordance with the law prior to instituting this lawsuit.
4. That Plaintiff-Intervener will be unduly prejudiced if he is not allowed to intervene in the above cause of action.

5. **WHEREFORE**, Plaintiff prays this Court allow him to intervene in the above entitled cause and for such other orders as this Court deems just and proper.

Respectfully submitted,

LAMPIN, KELL, FAGRAS, LINSON,  
CUSTER & STAEBELL

/s/ Michael J. Fargas  
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**CERTIFICATE OF SERVICE**

The above hereby certifies that on the 16<sup>th</sup> day of November, 2004, the foregoing was filed electronically with the Clerk of the Court, to be served by operation of the Court's electronic filing system upon the following:

Barbara Seeley, EEOC  
Mary Bonacorsi, Thompson Coburn, LLP

/s/ Michael J. Fargas