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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

EQUAL EMPLOYMENT OPPORTUNITY	:	
COMMISSION,	:	
	:	
Plaintiff	:	
	:	No. 03-5461
v.	:	
	:	
MUHLENBERG MEDICAL ASSOCIATES,	:	
	:	
Defendant	:	Jury Trial Demanded
	:	
v.	:	
	:	
JOSEPH R. HASSAN, Ph.D., M.D.,	:	

THIRD PARTY COMPLAINT

NATURE OF THE ACTION

This is an action pursuant to F.R.C.P. 14 by Defendant/Third Party Plaintiff, Muhlenberg Medical Associates, P.C., as against Third Party Defendant, Joseph R. Hassan, Ph.D., M.D. The action arises out of a Complaint brought by the Equal Employment Opportunity Commission as against Defendant/Third Party Plaintiff to the above-captioned term and number. True and correct copies of Plaintiff’s Complaint and Defendant’s Answer with Affirmative Defenses are attached hereto as Exhibits “A” and “B”, respectively, and incorporated herein by reference.

JURISDICTION AND VENUE

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §451, 1331, 1343 and 1345.

2. The employment practices alleged to be unlawful took place within the jurisdiction of the United States District Court for the Eastern District of Pennsylvania.

3. Third Party Plaintiff is a Pennsylvania corporation with its principal place of business at 4201 Kutztown Road, Reading, PA 19560.

4. Third Party Defendant Hassan is an adult individual whose address is 810 Berkshire Drive, Wyomissing, Berks County, Pennsylvania.

5. Third Party Defendant Hassan is not a party to the underlying action.

6. Third Party Plaintiff incorporates herein by reference Exhibit "A", EEOC Complaint, and Exhibit "B", Third Party Plaintiff's Answer and Affirmative Defenses thereto.

7. Third Party Defendant Hassan is or may be liable to Defendant for all or part of Plaintiff's and class member's claims versus Third Party Plaintiff.

8. Third Party Defendant Hassan is solely liable or liable over to Third Party Plaintiff for contribution and indemnification for any and all damages entered in EEOC's favor as against Third Party Plaintiff.

WHEREFORE, Third Party Plaintiff, Muhlenberg Medical Associates, P.C., respectfully requests this Honorable Court to enter relief in its favor as more fully determined at the time of trial.

Respectfully submitted,

Leisawitz Heller Abramowitch Phillips, P.C.

Kevin A. Moore, Esq.
Attorney for Defendant