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4/4/19

THE KAMBER LAW GROUP, P.C.

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTINE FEIT

Plaintiff,

v.

LEHIGH UNIVERSITY

Defendant.

No.

19 0336

Jury Trial Requested

COMPLAINT

By and through counsel, The Kamber Law Group, P.C., Plaintiff Christine Feit bring these complaints and charges of discrimination under Title VII of 1964 against Lehigh University for harassment and retaliation.

I. PARTIES

1. Plaintiff Christine Feit ("Feit") is an adult female individual, residing at 1650 Stanford Road, Bethlehem, PA 18018.

2. Defendant Lehigh University ("Lehigh," "University" or "Defendant") is a private college organized and operated under the laws of the Commonwealth of Pennsylvania, located at 27 Memorial Drive West, Bethlehem, PA 18015.

II. JURISDICTION

8. All events took place in Northampton County, Pennsylvania.

9. Lehigh University is located in Northampton County, Pennsylvania.

10. Mrs. Feit worked in Northampton County, Pennsylvania.

11. On November 7, 2017, Plaintiff filed a complaint within three hundred (300) days with the Pennsylvania Human Relations Commission the Equal Employment Opportunity Commission.

12. On or about July 29, 2018, the Pennsylvania Human Relations Commission transferred the case to the Equal Employment Opportunity Commission for investigation.

13. The Equal Employment Opportunity Commission closed its file on February 28, 2019 and issued a right to sue letter, received by Plaintiff on or about March 4, 2019.

III. BACKGROUND

12. Feit worked for Lehigh University from July 3, 2008 until May 4, 2017.

13. Feit was employed as a Certified Medical Assistant (“CMA”) in Lehigh University’s Health Center (“Health Center”).

14. Feit’s immediate supervisor was Adriane Stasurak, Nursing Supervisor (Stasurak).

15. Dr. Thomas Novak (Novak) was and is a physician working in the Health Center.

16. Novak was a supervisor for Feit at all relevant times.

17. On or about May 2016, Dr. Susan Kitei, the Medical Director (“Kitei”), left her position, and Lehigh University appointed Novak as Interim Medical Director for the Health Center.

18. Novak remains as Interim Medical Director as the date of this complaint.

19. As a CMA, Feit’s job duties included but not limited to patient intake, checking vital signs, performing lab tests, limited types of direct clinical care within her scope of practice,

maintaining clinical supplies, maintaining medical equipment, state reporting of STI, influenza and other reportable diseases, maintaining lab proficiency, coordinating with the athletic department to maintain NCAA guidelines and schedule sports physical clinics, maintain laboratory statistics, completing the ACHA Annual Collage Health Survey, scheduling student appointments as necessary and covering administrative duties as needed.

Novak's Harassment of Christine Feit

20. When she first joined the Health Center, Feit learned from her female coworkers that Novak had a pattern of behavior: when new female staff joined the Health Center, Novak would become friendly toward them, then sexually forward, and then sexually inappropriate.

21. Feit's coworkers told her that if she complained about Novak, nothing would be done by Lehigh, and Novak would alienate the complainer, so there was nothing to be accomplished by complaining.

22. After her first few months of employment, Feit noticed that Novak's comments to her became sexual: Novak made sexual comments about students, staff and even pop culture icons.

23. In 2009, approximately a year into her employment, Novak started making comments about Feit's clothing, outfits, and what brassieres would best suit her.

24. Novak started to make routine comments about Feit's skirts and pants and the way they made Feit's buttocks look.

25. Novak started commenting about Feit wearing clothing that was either tight fitting, or if any cleavage could be seen, that Feit should wear them more often.

26. Novak routinely commented any time he saw Feit wear a sports brassiere, saying it was not "flattering enough" and she should not wear them.

27. Novak routinely made sexual statements about his wife to Feit.

28. Feit's job required her to stock supplies in the medical room, located across from Novak's office door.

29. Novak routinely would find Feit stocking supplies, and he would comment about her "bending over" or would say "isn't there anything that has to be stocked on the lower shelves?"

30. Despite Feit's efforts to stock only when Novak's door was closed, supplies were stocked twice per day, and these comments occurred anytime Novak's door was open and Feit had to stock supplies.

31. If Feit was scheduled to assist Novak with gynecological exams, he would routinely brush his body against Feit in the small lab outside of the room where the paper work and lab supplies were gathered.

32. Novak would routinely lean in and smell Feit's hair. One occasion, Novak startled Feit by leaning in on her when she was getting ice from the freezer making her jump. When she jumped, she cut the back of her hand on the icemaker. Novak looked at the cut and told Feit to get bandage for it.

33. Also, by example, a student asked Novak and Feit about having a breast reduction during a medical review, as she was considering surgery. In front of Novak, Feit told the student she had personally experienced the surgery, and she could answer any questions the student had.

34. After the appointment, Feit's colleagues told her that Dr. Novak was making jokes and comments about Feit's breasts and her reduction surgery.

Novak's Harassment of Feit's Female Coworkers

35. Novak sexually harassed Feit's female coworkers.

36. Novak made ongoing comments about the administrative assistant any time she wore a skirt, including that he liked the way she walked when she wore a skirt.

37. Feit heard Novak tell an administrative assistant that his wife wanted to have a “three-way” and asked the assistant what she thought about it and what he should do.

38. Novak gave an inappropriate homemade birthday card to same assistant, who was very upset by it.

39. Novak copied an article from Good Housekeeping regarding how “good wives” should behave and passed out copies to all the female employees that worked under him.

40. Novak emailed a joke about “butts” to several employees.

41. Novak made a comment about an employee’s son, who was coming in as a freshman, stating that mother needed to buy “plenty of extra sheets” because he was “going to have a lot of sex.”

42. Every year, when the Sports Illustrated Swim Suit issue came out, Novak made a very big deal about it; he often made comments about certain celebrities, especially Brooklyn Decker, Kate Upton, and Charlize Theron, including what he would like to do to them sexually.

43. Novak would routinely comment about female students he saw that he thought was pretty or “hot.”

44. Novak would routinely comment on students with large breasts saying, “Did you see the size of those?”

45. Novak made a comment after seeing a male homosexual student “Aaron,” that the student was “checking out his junk” and said, “I think he wants me.”

46. After reviewing gynecological health history forms, Novak would routinely remark about students' sexual orientation and the types of sex that they would have specifically pointing out which ones engaged in anal sex and would state that they were "wild."

The Impact of the Harassment on Feit

47. Feit was constantly upset and angered by Novak's comments and actions.

48. Feit felt forced to not wear anything that she felt would trigger a comment from Novak; by 2016, she would often turn around and go home in the morning to change her clothes if, while driving to work, she felt what she was wearing would elicit a comment.

49. Feit sought to avoid being alone with Novak but had work alongside him to keep her job.

50. Feit sought to avoid speaking with Novak and when she could not, she tried to keep the conversations professional and short.

51. Novak routinely turned the conversations to inappropriate topics.

52. Feit was emotionally harmed by Novak's ongoing harassment of her.

Complaints to Lehigh University about Novak

53. Feit complained repeatedly about Novak's sexual harassment of her and his sexual misconduct toward others to her supervisors and to Human Resources.

54. Throughout Feit's tenure with Lehigh, she complained to Stasurak about Novak's sexual harassment of her and others, as did other employees.

55. Feit also complained to Stasurak that Novak was inappropriately performing breast exams on students.

56. Feit complained that she always had to hand Novak gloves during pelvic exams because he would attempt to proceed without them as per protocol.

57. On one occasion, in 2016, Stasurak asked if Novak were “copping a feel,” with students, to which Feit said “yes.” Stasurak told Feit that it’s good to know that it’s the first exams for these girls, so they wouldn’t know something was wrong.

58. In Fall 2012, Novak told Feit, along with a female coworker, not to schedule him any “fat or ugly chicks.”

59. Feit reported the incident to Stasurak, and that Novak had been performing inappropriate breast exams on female students. She told Stasurak she could not, in good conscience, schedule any other female student with him, unless they expressly asked for him.

60. In response, Stasurak, per Dr. Kitei, stripped Feit’s job duty of scheduling female patients.

61. When Feit complained about Novak to Stasurak throughout the years, Stasurak repeatedly told Feit that Novak was watching everyone and that they cannot give him any reason to fire them.

62. In 2012 upon learning of other inappropriate sexual behavior from two other employees, Feit, along with two other employees, reported Novak to Human Resources.

63. Feit spoke with Judith Zavalvdriga (“Zavalvdriga”) in Human Resources.

64. Feit stated that Novak’s behavior was unacceptable and had to stop.

65. Zavalvdriga had a meeting with Novak and Feit.

66. Novak started to cry during the meeting and tearfully apologized.

67. When Zavalvdriga asked Feit what she wanted from the meeting, Feit told Zavalvdriga that she did not want to see Novak terminated, because he was allegedly the sole provider for his family. Feit told Novak she did not accept his apology and she did not want him

disparaging her or retaliating against her, as he did other subordinates who had complained to Lehigh about him.

68. After the meeting, Novak told other employees that Feit was “dead” to him.

69. Within a month, Novak returned to his prior improper sexual harassment.

70. When Feit complained to Kitei about Novak’s comments, including Novak’s directive that she not to schedule ugly or fat girls with him, Kitei stripped Feit of her job duties in retaliation.

71. Despite her repeated complaints, nothing was done to address Novak’s actions.

72. Feit was pretextually terminated by Lehigh University for complaining of Novak’s sexual harassment.

73. Of the three employees who reported Novak, one left shortly after reporting Novak and the other was terminated shortly thereafter.

74. On or about March 2016, Feit reported an incident regarding Novak to Stasurak, who reported the matter to Human Resources.

75. On or about April 2016, Linda LeFever, of Human Resources, (“LeFever”) held a meeting with Novak, Feit, and another staff member who also had complained about Novak’s behavior.

76. Feit and the staff member told LeFever about Novak’s harassing behavior.

77. Novak began to cry, making tearful excuses for his behavior.

78. LeFever immediately stopped the meeting to allow Novak to recover his emotions.

79. Feit emailed LeFever numerous times for a new date.

80. LeFever said she was busy and would get back to Feit.

81. LeFever never rescheduled the meeting.

82. Feit felt outraged and upset by Novak's actions.

83. Feit was very upset and concerned for students and disgusted by Novak's actions.

84. Feit was angry about Novak's refusal to change.

85. Feit was shocked that Human Resources would not address the issues with Novak.

86. On or about April 27, 2017, a nurse asked Feit to look at a student ("D_")¹ allergy chart because he did not understand the schedule.

87. D_ had been prescribed allergy injections by his provider, to be performed at the Health Center.

88. As it does with each patient, the Health Center maintained a medical chart with D_'s allergy injections, including doses.

89. The chart was supposed to be reviewed by his provider, a certified medical assistant or registered nurse from Lehigh.

90. D_'s dose, according to the chart, was recorded as higher than that prescribed by the allergist.

91. Despite this, the chart had been filed, and the patient had received his injections with Feit.

92. Unaware of the error, Feit had administered the dosage according to the information filed on the chart.

¹ Names of patients, also students, have been shortened to initials to protect privacy.

93. Each time he was scheduled for the injection, D_'s chart was reviewed and signed by a provider who never caught the error.

94. Upon review in April 2017, Feit discovered the patient's allergy schedule was not correct: neither a certified medical assistant or registered nurse had reviewed the chart, and the patient's provider signed the chart but did not catch the dosing error.

95. Feit immediately reported the issue to Stasurak.

96. Feit contacted the student and the allergist to assess any harm; D_ reported no reaction whatsoever to the error in concentration.

97. Feit contacted the allergist to assess any harm.

98. The allergist responded with a letter instructing that D_'s injections continue at the new concentration.

99. Normally, in cases of medication errors, the Health Center would convene a staff meeting to discuss safety.

100. Normally, no employee would be formally reprimanded.

101. In the instant case, Stasurak wrote Feit up for causing the error falsely, knowing that Feit did not cause the error.

102. Stasurak also wrote up Feit falsely for allegedly treating a student's injury without having a physician or Certified Registered Nurse Practitioner review it.

103. A student, "A_" had come into the Health Center; while wearing sandals, he had scraped his big toe.

104. Feit told Stasurak that she had not treated the student without proper review; she had placed A_ on the schedule for both Dr. Kitei and herself.

105. She treated the injury pursuant to proper protocol by treating the wound.

106. The student had to wait to see Dr. Kitei and was impatient to leave for a class.

107. Feit checked on the student several times, and after about twenty minutes, the student said he had to leave.

108. Feit advised him that leaving was against medical advice (“AMA”) and urged him to stay and be seen by the doctor.

109. He insisted he had to leave, and Feit urged him, a minimum, to return immediately after class, which he agreed to do.

110. Administrative Assistant, Christina Finley, (“Finley”) witnessed the conversation and the student’s refusal to stay.

111. Stasurak ignored Feit’s explanation and told her to sign the writeup, stating it only acknowledged that they had the discussion

112. Stasurak also falsely alleged Feit made or was written up for “multiple injection errors” between 2012 and 2015.

113. On May 4, 2017 a meeting with Stasurak in the afternoon was added to Feit’s schedule.

114. At the time of the meeting, Stasurak informed Feit that the meeting was to be held at Human Resources.

115. Feit was aware that, historically, when employees are asked to go to Human Resources, they usually are terminated.

116. Feit asked Stasurak if she should take her belongings. Stasurak said “bring what you need.”

117. Feit met with Stasurak and Zavaldriga.

118. Stasurak stated “There cannot be any errors.”

119. Feit complained again about Novak's behavior and how nothing is done to address the situation, to which Zavalydriga said "We're not here to discuss Tom."

120. Defendant had no basis in fact to terminate Feit lawfully.

121. Defendant unlawfully terminated Feit based on knowingly and intentionally untrue facts.

122. Defendant's termination of Feit was pretextual and done in response to Feit's complaint of sexual harassment and sexual misconduct against Novak.

IV. CLAIMS

COUNT I: GENDER DISCRIMINATION

123. Plaintiff repeats her allegations from paragraphs 1-122.

124. Plaintiff is a female.

125. Interim Medical Director, and her supervisor's supervisor, Novak sexually harassed Plaintiff throughout her tenure with Defendant based on her gender.

126. Plaintiff witnessed Novak's ongoing sexual harassment of other employees and students.

127. Plaintiff complained repeatedly to Defendant's management, but Defendant protected Novak and took no action to stop Novak's ongoing harassment of employees and students.

128. Plaintiff suffered harm due to Novak's ongoing sexual harassment.

129. It is believed, and therefore averred, that Defendant discriminated against Plaintiff because of her gender under Title VII of the Civil Rights Act.

COUNT II: RETALIATION

130. Plaintiff repeats her allegations from paragraphs 1-129.

131. Plaintiff complained to Defendant on an ongoing basis that she was being sexually harassed by Novak, the Interim Medical Director.

132. Plaintiff complained to Defendant on an ongoing basis that she was forced to witness Novak's sexual harassment of other staff and female students.

133. After Plaintiff repeatedly complained of Novak's harassment, in retaliation, Defendant stripped her job duties.

134. After Plaintiff repeatedly complained of Novak's harassment, in retaliation, Defendant pretextually terminated her employment.


135. It is believed, and therefore averred, Defendant retaliated against Plaintiff because of her complaints of illegal harassment under Title VII of the Civil Rights Act.

V. REMEDIES REQUESTED


As the direct and proximate result of defendants' discriminatory, retaliatory, and harassing treatment, plaintiff have been caused to suffer and is requesting damages in the form of lost wages; anticipated wages; out-of-pocket expenses including attorney's fees and costs; emotional distress; mental anguish; reinstatement, reinstatement of benefits, pain and suffering; inconvenience; humiliation; loss of the enjoyment of life; and punitive damages.

THE KAMBER LAW GROUP, P.C.

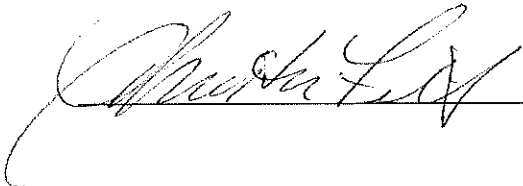
Date: May 22, 2019

By: 
Deirdre Kamber Todd, Esquire
ID No. 92613
1275 Glenlivet Drive, Suite 100
Allentown, Pa 18106
484.224.3059
DKT@KamberLegal.com
Attorney for Plaintiff

VERIFICATION


I, Michael Lee, hereby state and aver that I have read the foregoing **PLAINTIFF'S COMPLAINT**. The factual statements contained therein are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false statements, I may be subject to criminal penalties.

DATE: 5.20.19



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTINE FEIT
Plaintiff,

v.

LEHIGH UNIVERSITY
Defendant.

No.

Jury Trial Requested

CERTIFICATE OF SERVICE

I, Deirdre Kamber Todd, hereby certify that Plaintiff's Complaint has been filed with the Court on May 22, 2019, and Defendant has been served in accordance with the Rules of Court.

Dated: 05/22/2019

BY: /s/ Deirdre Kamber Todd
Deirdre Kamber Todd
ID No. 92613
THE KAMBER LAW GROUP, P.C.
1275 Glenlivet Drive, Suite 100
Allentown, PA 18106
(484) 224-3059
DKT@KamberLegal.com
Attorney for Plaintiff

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS **GJP**

CHRISTINE FEIT

(b) County of Residence of First Listed Plaintiff Lehigh
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

THE KAMBER LAW GROUP, P.C., 1275 Glenlivet Dr, Ste 100, Allentown, PA 18106 | 484.224.3059

DEFENDANTS **19** **2336**

LEHIGH UNIVERSITY

County of Residence of First Listed Defendant Northampton
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	SOCIAL SECURITY
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			IMMIGRATION	FEDERAL TAX SUITS
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from Another District (specify)

6 Multidistrict Litigation - Transfer

8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Title VII of the Civil Rights Act of 1963, 42 USC 2000e

Brief description of cause:
Gender harassment, discrimination, and retaliation in employment

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ _____

CHECK YES only if demanded in complaint:
 JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER MAY 23 2019

DATE 05/22/2019 SIGNATURE OF ATTORNEY OF RECORD [Signature]

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

GJP

23

2336

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 1650 Stanford Road, Bethlehem, PA 18018

Address of Defendant: 524 Brodhead Avenue, Bethlehem, PA 18015

Place of Accident, Incident or Transaction: 524 Brodhead Avenue, Bethlehem, PA 18015

AIR

RELATED CASE, IF ANY:

Case Number: Judge: Date Terminated:

Civil cases are deemed related when Yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes No
- 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes No
- 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? Yes No
- 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? Yes No

I certify that, to my knowledge, the within case is / is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 05/29/2019 Attorney-at-Law / Pro Se Plaintiff 92613 Attorney I.D. # (if applicable)

CIVIL: (Place a √ in one category only)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
- 2. FELA
- 3. Jones Act-Personal Injury
- 4. Antitrust
- 5. Patent
- 6. Labor-Management Relations
- 7. Civil Rights
- 8. Habeas Corpus
- 9. Securities Act(s) Cases
- 10. Social Security Review Cases
- 11. All other Federal Question Cases (Please specify):

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury (Please specify):
- 7. Products Liability
- 8. Products Liability - Asbestos
- 9. All other Diversity Cases (Please specify):

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Deirdre Kamber Todd, counsel of record or pro se plaintiff, do hereby certify:

Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

Relief other than monetary damages is sought.

MAY 23 2019

DATE: 05/29/2019 Attorney-at-Law / Pro Se Plaintiff 92613 Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GJP

CASE MANAGEMENT TRACK DESIGNATION FORM

Feit

v.

ALR

CIVIL ACTION

Lehigh University

19 2336
NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

<u>05/29/19</u>	<u>Deirdre Kamber Todd</u>	<u>Plaintiff</u>
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