

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ANDREWS,

Plaintiff,

v.

THE UNIVERSITY OF PITTSBURGH,

Defendant.

CIVIL DIVISION

No.:

COMPLAINT

Filed on Behalf of Plaintiff
MICHAEL ANDREWS

Counsel of Record for This Party:

J. Michael Baggett, Esquire
PA I.D. No. 30651

McCANN GARLAND RIDALL & BURKE
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11 Stanwix Street
Suite 1030
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(412) 566-1817 – facsimile
jmbaggett@mgrblaw.com

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ANDREWS,)	CIVIL DIVISION
)	
Plaintiff,)	No.:
)	
v.)	
)	
THE UNIVERSITY OF PITTSBURGH,)	
)	
Defendant.)	

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
Telephone: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ANDREWS,) CIVIL DIVISION
)
Plaintiff,) No.:
)
v.)
)
THE UNIVERSITY OF PITTSBURGH,)
)
Defendant.)

COMPLAINT

AND NOW comes the Plaintiff, Michael Andrews, by and through his undersigned counsel and in support of his Complaint states as follows:

1. Plaintiff, Michael Andrews (“Andrews”) is an adult individual residing at 4066 Dalewood Street, Pittsburgh, Pennsylvania 15227.
2. Defendant, The University of Pittsburgh is an institution of higher learning and part of the Commonwealth of Pennsylvania System of Higher Education (“The University”) located at 4200 Fifth Avenue, Pittsburgh, Pennsylvania 15260. The University employs more than 5,000 full and part-time employees.
3. This action arises under the Age Discrimination in Employment Act of 1967 as amended, 29 U.S.C.A. §621 et seq. (“ADEA”), the Pennsylvania Human Relations Act, 43 P.S. §951 et seq. (“PHRA”) and Pennsylvania common law.
4. Jurisdiction in this Court is appropriate as on October 29, 2018 Plaintiff filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission (“EEOC”) and dual filed with the Pennsylvania Human Relations Commission (“PHRC”).
5. On January 27, 2020, the EEOC issued a Dismissal and Notice of Rights (“Notice”) letter advising Plaintiff he had ninety (90) days from his receipt of the Notice to file a

lawsuit in either federal or state court. A true and correct copy of the Notice is attached hereto as Exhibit “1.”

6. On April 25, 2018, Andrews received a letter from Randall L. McCready, Ph.D., (“McCready”) the Executive Director of Financial Aid, notifying him that he was being terminated from his position as a Financial Aid Systems Analyst (“Termination Letter”). At the time of his termination Andrews was sixty-one (61) years of age. A true and correct copy of the Termination Letter is attached hereto as Exhibit “2.”

COUNT I

UNLAWFUL DISCRIMINATION

7. Andrews began his employment with The University on October 26, 2005 as a part-time employee. In April 2007, Andrews became a full-time employee within the University’s Housing Department.

8. Prior to his employment with the University, Andrews had worked for US Airways and Fisher Scientific as an analyst. In 2008 Andrews applied for and accepted a position within the University’s Office of Admissions and Financial Aid (“OAFa”).

9. Andrews was employed as a system analyst in the Financial Aid Systems Department. The Department initially was comprised of a lead analyst, Andrews, one (1) other analyst and a business systems analyst. The Department maintained and supported the business system known as PeopleSoft which is used to track student financial aid records.

10. From 2008 through 2017, Andrews received annual reviews from three (3) different supervisors evaluating his job performance as “Successful.”

11. During Andrews’ tenure, OAFa underwent internal modifications to the systems utilized to process a student’s financial aid award. Supervision of the financial aid analysts also

changed and in or about December 2014 and the financial aid team members reported to McCready.

12. During 2015, 2016, and 2017, Admir Music (“Music”) served as the Lead Analyst and provided annual performance reviews for the department analysts. In June 2017 Music provided Andrews with a positive “Successful” review.

13. In spite of having not worked directly with Andrews, McCready changed the review provided by Music, Andrews’ immediate supervisor, from “Successful” to “Improvement Needed.” Andrews then met with McCready and objected to the change of his performance review.

14. During their meeting, McCready indicated that he would change the annual review back to “Successful.” On the day after the meeting, McCready provided Andrews with his annual review and requested that it be signed by Andrews. In spite of McCready’s promise to adopt the original evaluation, the evaluation that McCready provided for signature did not reinstate the original “Successful” on certain portions of the review as represented and agreed.

15. In reaction to McCready’s conduct, Andrews met with Jane Volk (“Volk”) from the University’s Office of Human Relations complaining about McCready’s actions. Andrews was advised that Volk subsequently contacted McCready and directed him to change the review back to the original “Successful” provided by Music.

16. In his meeting with Volk, Andrews objected that a newly-hired and younger analyst, Honjay Kim (“Kim”) who was in the same job classification and performing the same duties as Andrews, was being paid more than Andrews.

17. Andrews informed Volk that he believed that he was being paid less than Kim because of his age. Andrews expressed concern that he was a victim of discrimination as a result

of his age evidenced by McCready changing his annual review evaluation and being paid less than Kim for performing the same job classification.

18. In early 2017, Michelle Jackson (“Jackson”) was appointed to serve as Associate Director Compliance & Operations in the OAFA. Shortly after Music left OAFA in June 2017, Jackson was appointed as the temporary supervisor of the systems team.

19. During early 2017, Andrews’ job description was redesignated as technology and responsibilities of the financial aid systems analyst had changed significantly. Andrews’ position was reclassified to a Systems/Programmer 1.

20. In spite of the change in technology and increased analyst responsibilities, Andrews’ department had been decreased from four (4) to three (3) after the departure of Music.

21. As a result of the adoption of the new technology system, passwords utilized by the analysts were constantly being changed. In or about August 2017, Jackson, his temporary supervisor, visited Andrews at his work station to observe his skills and knowledge of the new system regarding job scheduling. Andrews was unable to log on to the system and requested information from fellow analyst Jeff Jativa (“Jativa”) sitting nearby. Jativa could not hear him because he was wearing his personal headphones. Andrews attempted to seek information from Jativa but was instructed by Jackson not to do so. Jativa advised that he had changed the system password without advising Andrews which prevented him from logging into the system in the presence of Jackson. Andrews felt threatened by Jackson’s refusal to permit him to contact another team member regarding work related matters. Andrews addressed this situation with McCready that day expressing his concern that Jackson was restricting his contact with a fellow worker (Jativa). McCready never confirmed that he had spoken with Jackson about the incident or her aggressive and threatening behavior.

22. In or about November 2017, Kim resigned, leaving Andrews and Jativa as the only analysts. As a result of the reclassification that took place in 2017, Andrews' job responsibilities increased and he was assigned with additional tasks that needed to be learned. Rather than provide additional support, the department was reduced from four (4) analysts to only two (2).

23. On or about December 7, 2017, Jackson met with Andrews and opined that Andrews seemed frustrated. Andrews did express frustration in that he believed that he was not getting sufficient support from Jackson as his supervisor at which point Jackson became irritated and defensive. Andrews indicated that since Jackson was responsible for the department annual reviews, it may be beneficial if she would sit down with the analysts and learn more about the quantity and quality of the workload. The meeting was conducted in a professional and businesslike manner.

24. On the very next day, December 8, 2017, Andrews was called to a meeting with Chief Enrollment Officer, Mark Harding ("Harding"), McCready, and Peggy Dunklin ("Dunklin") from Human Relations. He was questioned about the meeting with Jackson on the previous day. Andrews was presented with a letter of insubordination accusing him of being insubordinate and disrespectful to his supervisor. Jackson was not at that meeting and Andrews was denied the opportunity to rebut or refute Jackson's allegations. Andrews expressed his concern that the letter was written without asking Andrews his version of what had occurred in his meeting with Jackson.

25. On or about December 16, 2017, Andrews met again with Volk regarding the insubordination letter and the false allegations therein. Andrews advised Volk he believed his

treatment was in retaliation for his complaint about McCready changing his evaluation and his complaint regarding age discrimination evidenced by the wage disparity with Kim.

26. During the conversation, Volk encouraged Andrews to accept his responsibilities and adopt a new approach in dealing with Jackson.

27. Thereafter, Andrews followed the advice of Volk and arrived to work early, worked through lunch, and stayed late. In or about January 2018, Jackson became the permanent director of OAFA. The lead position of the systems team remained vacant and Jackson directly supervised the systems team. In February 2018, McCready and Jackson met with Andrews and advised Andrews that his performance had improved and “to keep up the good work.”

28. On or about April 12, 2018, Andrews had programmed a “Missing Information Notification” to be sent via email at approximately 6:00 a.m. to less than 100 students advising them that they needed to submit additional information to OAFA so that their financial aid applications could be processed. A sample copy of the initial Missing Information Notification (“Initial Notification”) is attached hereto as Exhibit “3.”

29. Upon arriving at work on April 12th, Andrews reviewed the Initial Notification and realized that it did not include reference to the “Verification Worksheet” which contained a description of the missing information being requested. Andrews attempted to contact Jackson to explain the situation. Jackson however was not in her office. Andrews then took the initiative and assumed responsibility to send out a second replacement Missing Information Notification (“Corrected Notification”). The Corrected Notification contained reference to the Verification Worksheet and description of the missing documentation. No students were adversely impacted. A sample copy of the Corrected Notification is attached hereto as Exhibit “4.”

30. On April 13, 2018, Andrews met with Jackson and explained the error and his immediate efforts to correct the error in order to provide the students with the correct information as soon as possible. Jackson advised Andrews that if such an event occurred in the future, he should send an additional email indicating the first correspondence was in error.

31. On April 25, 2018, Jackson summoned Andrews to an unscheduled meeting with McCready and Volk at which he was handed the Termination Letter. The Termination Letter accused Andrews of sending thousands of emails with incorrect information to students and candidates. Andrews was further accused of exacerbating his mistake by deleting the original communications when he realized his error.

32. When Jackson was unavailable on the morning of April 12th for consultation, Andrews took the initiative to correct the error and send a corrective email within hours after it was discovered. The Corrected Notifications were sent to those individuals that had received the original erroneous communication. In order to send the Corrected Notifications, the operating system required deletion of the Initial Notification from the system. Andrews did not attempt to conceal his error.

33. A younger female Executive Director of Admission, Kelly Cain, had a similar error and sent thousands of erroneous letters to students. She was not terminated and Andrews is of the information and belief no disciplinary action taken.

34. At the time of his termination, Andrews was the oldest employee in the financial aid department at an annual salary of \$38,217.00. Andrews was replaced with a younger male with no experience who was in his mid 20s years of age.

35. The University's termination of Andrews based upon the event described in the Termination Letter was a pretext to conceal the age discrimination and retaliation against

Andrews for complaining about the disparity in compensation between Andrews and a younger employee within the same job classification and complaining about McCready improperly altering his annual performance review.

36. Andrews did not receive the support and instruction from his supervisor to assist him in learning the newly-installed technology making it inevitable that Andrews would become frustrated with his ability to perform the tasks assigned him within the understaffed financial aid systems department. In fact Jackson instructed Andrews not to seek assistance from his fellow analyst. When Andrews addressed such lack of support in the meeting with his supervisor, Jackson, he was presented with a letter of insubordination rather than with a plan of action to assist him with the performance of his job responsibilities.

37. The University has adopted a handbook providing for a progressive disciplinary process and grounds for dismissal. Andrews was denied the disciplinary process and discharged for making an error and correcting it before notifying his supervisor. Such conduct is not grounds for termination.

38. The University engaged in a concerted effort and pattern of conduct to rid Oafa of older employees, including Andrews, as exemplified by a series of departures of senior experienced employees within the financial aid department since the hiring of Harding and McCready.

WHEREFORE, Plaintiff, Michael Andrews, respectfully requests this Honorable Court to enter judgment in his favor and against Defendant, The University of Pittsburgh, as follows:

a. Direct Defendant, The University of Pittsburgh, to reinstate Plaintiff to his position as Systems/Programmer 1 or comparable position and award him with back pay from April 25, 2018 through the date of reinstatement;

b. In the alternative to reinstatement, enter judgment in favor of Plaintiff in the amount of his projected past and future earnings including contribution to his 401(k) retirement program from April 25, 2018 through July 20, 2026, his anticipated date of retirement;

c. Enter judgment in an amount in excess of \$35,000.00 as compensatory damages as a result of the pain and suffering, mental anguish, emotional distress, humiliation and defamation as suffered by Plaintiff as a result of Defendant's intentional or reckless acts of discrimination in violation of the PHRA and the laws of the Commonwealth of Pennsylvania;

d. Award interest in the amount of damages attributable to Plaintiff's back pay;

e. Award costs and attorney's fees; and

f. Award such other legal and equitable relief as this Court may deem just and proper.

COUNT II

WRONGFUL TERMINATION

39. Paragraphs 1 through 38 are incorporated herein as though set forth in full above.

40. Andrews' discharge was in violation of public policy. The University failed to follow the progressive disciplinary procedures it put in place governing its employees. Andrews was discharged in retaliation for involving and complaining about The University's discrimination against him as a result of his age and unequal compensation with individuals similarly situated.

WHEREFORE, Plaintiff respectfully requests that a judgment in excess of \$35,000.00 plus costs, interest, and attorneys fees be entered against Defendant The University of Pittsburgh.

McCANN, GARLAND, RIDALL & BURKE

By: /s/ J. Michael Baggett

J. Michael Baggett, Esquire
Pa. I.D. #30651

Suite 1030
11 Stanwix Street
Pittsburgh, PA 15222
(412) 566-1818 – telephone
(412) 566-1817 – facsimile
jmbaggett@mgrblaw.com

VERIFICATION

I, Michael Andrews, hereby verify that the statements made in the foregoing Complaint are true and correct to the best of my information, knowledge and belief. I understand that this statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities and is given pursuant to the provisions for verification of pleadings as defined and provided for in Rule 1024 of the Pennsylvania Rules of Civil Procedure.


MICHAEL ANDREWS

EXHIBIT “1”

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Mike Andrews
4066 Dalewood St.
Pittsburgh, PA 15227

From: Pittsburgh Area Office
1000 Liberty Avenue
Room 1112
Pittsburgh, PA 15222

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No. 533-2019-00204
EEOC Representative Legal Unit Philadelphia District Office
Telephone No. (215) 440-2828

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
[X] The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
Other (briefly state)

- NOTICE OF SUIT RIGHTS -
(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission

Deborah A. Kane, Acting Director

01/27/20

Enclosures(s)

Deborah A. Kane, Acting Director

(Date Mailed)

cc: Shannon H. Paliotta
UNIVERSITY OF PITTSBURGH
2400 Cathedral of Learning
4200 Fifth Ave.
Pittsburgh, PA 15260

Mike Baggett, Esq.
11 Stanwix Street
Suite 1030
Pittsburgh, PA 15222

EXHIBIT “2”



University of Pittsburgh

1713A 11115

3 of 3

Office of Admissions and Financial Aid

April 25, 2018

Michael Andrews
40066 Dalewood Street
Pittsburgh, PA 15227

Alumni Hall
4227 Fifth Avenue
Pittsburgh, PA 15260-6601
412-624-PITT
Fax: 412-648-8815
oafa.pitt.edu

Dear Mike:

This letter is official notification that you will be terminated from your position as a Financial Aid Systems Analyst in the Office of Admissions and Financial Aid at the University of Pittsburgh effective on this date.

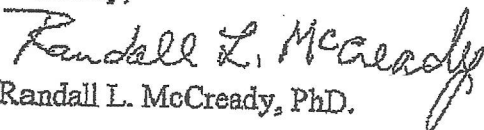
This termination is based on your recent conduct of initiating the sending of thousands of emails to students and candidates containing incorrect information. You exacerbated the error by deleting the communications in the system when you realized your error without reporting the error to your supervisor, leaving her unprepared for inquiries and rendering it impossible to identify which emails were correct and which were in error. Corrected messages could not be targeted appropriately, resulting in further unacceptable confusion to our students. This incident followed previous warnings about your performance, behavior and your communications with your supervisor.

Your final pay for time worked will be available to you on April 30, 2018. Payment for unused sick-time accrued will be equal to your accumulated unused sick time multiplied by one-half of the final base pay daily rate or \$2,500, whichever is less. Payment for any accrued but unused vacation days will be available to you on May 31, 2018.

Your University benefits will continue through April 30, 2018, after which you will receive a letter explaining your options for continuing health care benefits. If you are using the University education benefit, such benefits may be affected for the current term, depending on the timing. If you have questions regarding your benefits, please direct them to the Benefits section of the Office of Human Resources, at 412-624-8160.

You are required to return your I.D. card, keys, and any other University property that may be in your possession. You may collect any personal items today or make arrangements to return at a later date for this purpose.

Sincerely,


Randall L. McCready, PhD.

cc: Peggie Miller Dunklin
Marc Harding
Michelle Jackson
Jane Volk

EXHIBIT “3”

From: Financial Aid
Sent: Thursday, April 12, 2018 6:49 AM
To: [REDACTED]
Subject: Pitt Financial Aid: Additional Information Needed

University of Pittsburgh
Office of Admissions and Financial Aid
4227 Fifth Avenue, Alumni Hall
Pittsburgh, PA 15260-6601
Phone: (412) 624-7488
Fax: (412) 648-8815
Email: finaid@pitt.edu

April 12, 2018

Missing Information Notification

Dear [REDACTED]

In reviewing your records for the 2018-2019 academic year, the Financial Aid Office has determined we need the following items from or actions taken by you to process your financial aid. If the requested documentation is not submitted or the requested action is not taken, your financial aid award will be delayed. Also, previously awarded financial aid will not disburse to your student account.

Please submit the requested documents within 14 days. Documents received after 14 days will still be reviewed; however, processing may be delayed. You will find a more detailed description of what we need from you on your Student Center To Do List, which you can find by logging onto <https://my.pitt.edu> and following this path: Student Service Center Login > Self-Service > Student Center. If you are a newly admitted student, please refer to the login instructions sent to you by the Office of Admissions and Financial Aid.

Passport Login Service Request for my.pitt.edu

Multifactor Authentication. Multifactor authentication has been added to all services that leverage Pitt Passport. More information is available at technology.pitt.edu/multifactor.

Please contact us if you choose not to submit the requested documentation or if you are no longer planning to attend, so we can update our records accordingly.

Should you have any questions about this request or the status of your financial aid in general, please contact us. Our contact information can be found at the top of this letter.

Thank you for your prompt attention to this request. If you have already submitted all of the missing information referenced above, please disregard this notification.

Sincerely,

Randall L. McCready, Ph.D.
Executive Director of Financial Aid



EXHIBIT “4”

From: Financial Aid
Sent: Thursday, April 12, 2018 10:15 AM
To: [REDACTED]
Subject: Pitt Financial Aid: Additional Information Needed

University of Pittsburgh
Office of Admissions and Financial Aid
4227 Fifth Avenue, Alumni Hall
Pittsburgh, PA 15260-6601
Phone: (412) 624-7488
Fax: (412) 648-8815
Email: finaid@pitt.edu

April 12, 2018

Missing Information Notification

Dear [REDACTED]

In reviewing your records for the 2018-2019 academic year, the Financial Aid Office has determined we need the following items from or actions taken by you to process your financial aid. If the requested documentation is not submitted or the requested action is not taken, your financial aid award will be delayed. Also, previously awarded financial aid will not disburse to your student account.

Verification Worksheet

Please submit the requested documents within 14 days. Documents received after 14 days will still be reviewed; however, processing may be delayed. You will find a more detailed description of what we need from you on your Student Center To Do List, which you can find by logging onto <https://my.pitt.edu> and following this path: Student Service Center Login > Self-Service > Student Center. If you are a newly admitted student, please refer to the login instructions sent to you by the Office of Admissions and Financial Aid.

Passport Login Service Request for my.pitt.edu

my.pitt.edu

Multifactor Authentication. Multifactor authentication has been added to all services that leverage Pitt Passport. More information is available at technology.pitt.edu/multifactor.

Please contact us if you choose not to submit the requested documentation or if you are no longer planning to attend, so we can update our records accordingly.

Should you have any questions about this request or the status of your financial aid in general, please contact us. Our contact information can be found at the top of this letter.

Thank you for your prompt attention to this request. If you have already submitted all of the missing information referenced above, please disregard this notification.

Sincerely,

Randall L. McCready, Ph.D.
Executive Director of Financial Aid

[REDACTED]
Student ID: [REDACTED]

Email: [REDACTED]

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

MICHAEL ANDREWS,)	CIVIL DIVISION
)	
Plaintiff,)	No.:
)	
v.)	
)	
THE UNIVERSITY OF PITTSBURGH,)	
)	
Defendant.)	

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

McCANN, GARLAND, RIDALL & BURKE

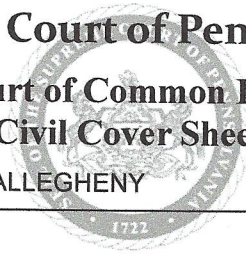
By: /s/ J. Michael Baggett
J. Michael Baggett, Esquire
Pa. I.D. #30651

Suite 1030
11 Stanwix Street
Pittsburgh, PA 15222
(412) 566-1818 – telephone
(412) 566-1817 – facsimile
jmbaggett@mgrblaw.com

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet

ALLEGHENY County



For Prothonotary Use Only:

Docket No:

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action: <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition <input type="checkbox"/> Transfer from Another Jurisdiction <input type="checkbox"/> Declaration of Taking	
Lead Plaintiff's Name: MICHAEL ANDREWS	Lead Defendant's Name: THE UNIVERSITY OF PITTSBURGH
Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dollar Amount Requested: (check one) <input type="checkbox"/> within arbitration limits <input checked="" type="checkbox"/> outside arbitration limits
Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Name of Plaintiff/Appellant's Attorney: J. Michael Baggett	
<input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)	

SECTION B

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort) <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other: _____ _____	CONTRACT (do not include Judgments) <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other _____ <input checked="" type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other _____ <input type="checkbox"/> Other: _____ _____	CIVIL APPEALS Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other _____ <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: _____ _____
MASS TORT <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: _____ _____	REAL PROPERTY <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: _____ _____	MISCELLANEOUS <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: _____ _____
PROFESSIONAL LIABILITY <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____ _____		