

IN THE UNITED STATES DISTRICT COURT

For the
Middle District of Pennsylvania

LINDA MISJA,	:	CIVIL ACTION
Plaintiff,	:	
	:	
v.	:	No.: 1:15-cv-01199-JEJ
	:	
PENNSYLVANIA STATE	:	The Honorable John E. Jones, III
EDUCATION ASSOCIATION,	:	
Defendant.	:	ELECTRONICALLY FILED
	:	

**MOTION TO DISMISS
OF THE
DEFENDANT PENNSYLVANIA STATE EDUCATION ASSOCIATION**

NOW COMES the Defendant, the Pennsylvania State Education Association (“PSEA”), by and through counsel, Thomas W. Scott, Esquire, and Killian & Gephart, LLP, and for the reasons set forth in their brief to be submitted in support of this Motion, hereby move, pursuant to Fed.R.Civ.P. 12(b)(6), to dismiss the Complaint in its entirety, with prejudice.

Concurrence in this Motion has been sought from Plaintiff. Plaintiff does not concur in the Motion.

Respectfully submitted,

/s/Thomas W. Scott

Date: August 18, 2015

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Attorneys for Defendant,
Pennsylvania State Education Association

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Dismiss of Defendant the Pennsylvania State Education Association has on this date been forwarded to the individual listed below as addressed, and in the manner indicated:

Via First Class Mail, postage prepaid
David R. Osborne, Esquire
The Fairness Center
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Date: August 18, 2015

/s/Thomas W. Scott

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