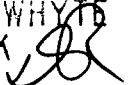


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA

2003 AUG 26 AM 10:15

LORETTA G. WHYTE
CLERK 

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,
an agency of the United States
of America,

Plaintiff

v.

K&B LOUISIANA CORPORATION
d/b/a Rite Aid

Defendant

C.A. No. 03-2079

SECT. F

MAG. 3

* * * * *

TIFFANY BLACKMON'S COMPLAINT IN INTERVENTION

Intervenor, Tiffany Blackmon, files this complaint in intervention as a party-
plaintiff, as authorized by Federal Rule of Civil Procedure 24.

A. Introduction

1. Intervenor, Tiffany Blackmon, is an individual domiciled in the State of
Louisiana.

2. Plaintiff, The U.S. Equal Employment Opportunity Commission (the "EEOC")
is an agency of the United States of America, and will be served with a copy of this
complaint through its attorney of record, N. Eleanor Graham, at EEOC, 701 Loyola,
Suite 600, New Orleans, LA 70113, New Orleans, LA by certified mail.

Fee _____
✓ Process _____
X Dktd _____
CtRmDep _____
Doc. No. _____

3. Defendant, K&B Louisiana Corporation d/b/a Rite Aid, is a foreign corporation authorized to do and doing business in the State of Louisiana. Defendant will be served with a copy of this complaint through its attorney of record, George D. Fagan, at Leake & Andersson, L.L.P., 1100 Poydras Street, Suite 1700, New Orleans, LA 70163-1701, by certified mail.

B. The Original Lawsuit

4. Plaintiff, the EEOC, sued Defendant for employment discrimination including sexual harassment, a sexually hostile environment and prohibited retaliation under Title VII of the Civil Rights Act. Defendant, K&B Louisiana Corporation d/b/a Rite Aid has not yet filed an Answer.

C. Intervenor's Cause of Action

5. Intervenor adopts, incorporates and realleges all the allegations of the original complaint filed herein by the EEOC, and request a trial by jury.

6. Intervenor is a person aggrieved by the conduct of the Defendant as complained of in the original complaint.

D. Damages

7. Intervenor has suffered economic losses, loss of income, benefits, humiliation, embarrassment, mental and emotional pain and suffering, inconvenience, and loss of enjoyment of life as a result of the conduct of Defendant, its agents and employees, as described in the original complaint.

F. Prayer

8. For these reasons, intervenor prays that after due proceedings she recovers a Judgment against Defendant, K&B Louisiana Corporation d/b/a Rite Aid for the following:

- A. Injunctive relief enjoining the Defendant's conduct;
- B. Award of damages to compensate her for her economic losses (including back-pay, front pay and loss of benefits), mental anguish, emotional distress, humiliation, embarrassment, inconvenience, and loss of enjoyment of life;
- C. Award of punitive damages in an amount sufficient to punish the Defendant for its conduct and to deter it from further conduct of a like nature; and
- D. An award of the reasonable expenses of litigation, including attorney's fees, costs, and applicable judicial interest.

Respectfully submitted,

ARRUEBARRENA & McNAMARA



James L. Arruebarrena (#22235) T.A.
Dwight L. McNamara (#22521)
3621 Ridgelake Dr., Suite 300
Metairie, Louisiana 70002
Telephone (504) 828-5595

Attorneys for Tiffany Blackmon

CERTIFICATE

I hereby certify that I sent a copy of Motion to Intervene as a Right Memorandum in Support, and Complaint of Intervention to each party's attorney listed below on August 22, 2003, by the method indicated next to the attorney's name.



JAMES L. ARRUEBARRENA

U.S. Equal Employment Opportunity Commission, represented by

N. Eleanor Graham
701 Loyola, Suite 600
New Orleans, LA 70113
Tel. (504) 589-6922
Fax (504) 589-2805

Certified Mail #7001 2510 0008 9933 5225

K&B Louisiana Corporation d/b/a Rite Aid, represented by

George D. Fagan
Leake & Andersson, L.L.P.
1100 Poydras Street
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Tel (504) 585-7500
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