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U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
FILED JAN 27 1999
RICHARD T. MARTIN
CLERK

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,
Plaintiff

MARK MOREHOUSE
Intervenor

v.

LOUISIANA GUEST HOUSE
Defendant

CIVIL ACTION NO
98-964
SECTION A
MAGISTRATE 3

COMPLAINT IN INTERVENTION

The intervenor above named, by leave of court first had and obtained, files this, his complaint of intervention, against the above-named defendant, and says:

1. Equal Employment Opportunity Commission, the original plaintiff herein, filed this complaint on November 13, 1998, against Louisiana Guest House, defendant, to correct unlawful employment practices on the basis of the defendant's failure to provide a religious accommodation to, and its constructive discharge of Mark Morehouse because of his Islamic religious prayer observance and to make whole Mark Morehouse.
2. Louisiana Guest House, the original defendant herein, has not filed an answer in the original action.
3. Since at least November 1997, defendant engaged in unlawful employment practices at its Baton Rouge, Louisiana facility in violation of Title VII, 42 U.S.C. Section 2000e-2(a). The unlawful employment practices consist of discriminating against Mark Morehouse based on his religion by not providing



3:98-cv-00964 5 - 1

a reasonable accommodation for Mr. Morehouse to attend his regular weekly Islamic religious prayer service, instead allowing Mr. Morehouse on an ad hoc basis to attend his prayer service only if his work duties were completed. Defendant also discriminated against Mr. Morehouse by constructively discharging him on January 16, 1998 when his prayer service conflicted with a work assignment.

4. The effect of the practices complained of above has been to deprive Mark Morehouse of equal employment opportunities and otherwise to adversely affect his status as an employee by discriminating against him on the basis of his religion.
5. The practices complained of above caused Mark Morehouse to suffer pecuniary losses, including loss wages and the costs of seeking new employment.
6. The practices complained of above caused Mark Morehouse to suffer non-pecuniary losses, including emotional pain, suffering, inconvenience and mental anguish.
7. The employment practices complained of above were committed with malice or reckless indifference to the federally protected rights of Mark Morehouse

WHEREFORE, this intervenor respectfully requests that this Court:

- A. Grant a permanent injunction enjoining the defendant, its officers, directors, managers, successors, assigns and all persons in active concert or participation with it from engaging in any employment practice which

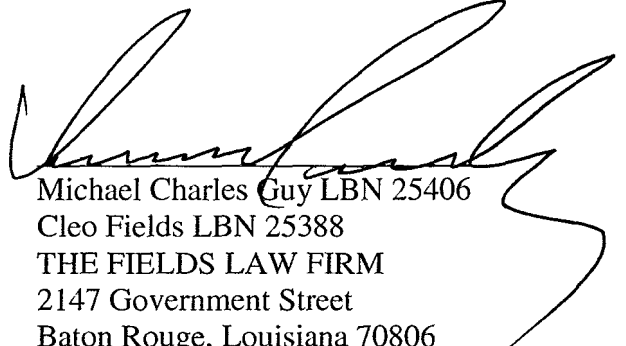
discriminates against its employees on the basis of religion in violation of Title VII;

- B. Order defendant to institute and carry out policies, practices and programs which eradicate the effects of its unlawful employment practices;
- C. Order defendant to make whole Mark Morehouse by awarding appropriate back pay with prejudgment interest, in amounts to be proven at trial, and other affirmative relief necessary to eradicate the effects of its unlawful practices, including but not limited to, awarding rightful place reinstatement or, alternatively, front pay;
- D. Order defendant to make whole Mark Morehouse by providing him compensation for other pecuniary losses, including but not limited to costs for seeking new employment, in amounts to be determined at trial;
- E. Order defendant to make whole Mark Morehouse by providing him compensation for non-pecuniary losses, including emotional pain, suffering, inconvenience and mental anguish;
- F. Order defendant to pay punitive damages in amounts to be proven at trial;
- G. Grant such further relief as the Court deems necessary and proper
- H. That an answer be filed be filed hereto by both Equal Employment Opportunity Commission, the original plaintiff herein, and by Louisiana Guest House, the original defendant herein.
- I. That the intervenor be granted reasonable attorney's fees.

JURY TRIAL DEMAND

The intervenor requests a jury trial on all questions of fact raised by its complaint.

Dated: January 12, 1999



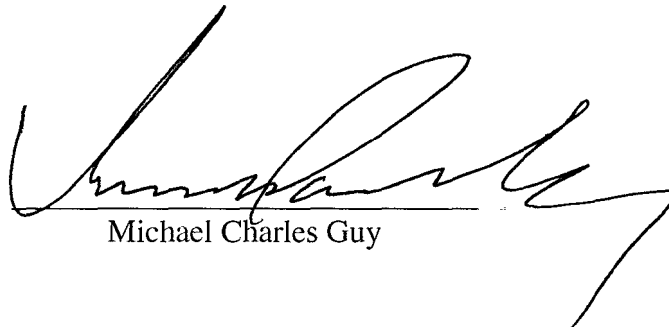
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CERTIFICATE OF SERVICE

I, Michael Charles Guy, hereby certify that a copy of the above and foregoing pleading has this 12th day of January 1999 been forwarded VIA U.S. Mail to the following persons:

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Equal Employment Opportunity Commission
New Orleans District Office
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New Orleans, Louisiana 70113

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Michael Charles Guy