

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

KIMBERLY MCLAUGHLIN,	:	
	:	CIVIL ACTION
Plaintiff,	:	
	:	
v.	:	
	:	NO. 04-CV-6003
PHILADELPHIA PHILLIES	:	
a/k/a/ THE PHILLIES,	:	
	:	
Defendant.	:	

**PLAINTIFF KIMBERLY MCLAUGHLIN'S
RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Fed. R.C.P. 26(a)(1), plaintiff Kimberly McLaughlin hereby provides the following initial disclosures:

Plaintiff, Kimberly McLaughlin, reserves the right to claim applicable objections to production of witnesses, documents and information, and makes this disclosure without waiving said right. Plaintiff further reserves the right to supplement or amend these disclosures based on continuing investigation, if applicable.

A. WITNESSES

Kimberly McLaughlin
241 Leon Avenue
Norwood, PA 19074

Eileen McLaughlin
241 Leon Avenue
Norwood, PA 19074

Lizzie DiPrimo
1825 Wolfe Street
Philadelphia, PA 19145

Ray Solley
Security Officer
2247 South Lambert Street
Philadelphia, PA 19145

The following witnesses are employees of defendant The Phillies:

Anne Wise
Section Supervisor

Bernadette Mansi
Secretary, Stadium Operations

Eric Tobin
Director, Event Operations

Louie Matrippolito
Head of Security

Dawn McClain
Game-day employee

Cathy Stamus
Security/Game-day employee

Bonnie Eastlock
Game-day employee

B. EXHIBITS

The following documents are in possession of plaintiff:

Log of events of Kimberly McLaughlin and Eileen McLaughlin.

The following documents are in possession of defendant:

Employment records for Ray Solley; including any investigation or background check performed prior to hiring and documents regarding his termination of employment

Employment records for Kimberly McLaughlin and Eileen McLaughlin.

All documentation and records of defendant The Phillies relating to complaints of sexual harassment by any agent or employee of The Phillies, including Ray Solley, from October 2000 to October 2004.

All records of the security department of The Phillies, including documents prepared or maintained by Louis Mastrippolito, head of security, relating to the incidents set forth in plaintiff's complaint.

Map of the seating sections of Veterans' Stadium.

Policies and procedures of defendant The Phillies relating to sexual harassment as of the 2003 season, as well as the 2004 and 2005 seasons.

Employee handbook of defendant The Phillies for the 2003 season as well as the 2004 and 2005 seasons.

C. DAMAGES

Plaintiff seeks compensatory damages for lost wages, emotional pain and suffering, inconvenience, mental anguish as well as punitive damages.

D. INSURANCE

N/A

Respectfully submitted,

Date: September 21, 2005

By: s/Michael R. Luongo
Michael R. Luongo
Attorney I.D. No. 63014
324 Chestnut Street, Suite 1108
Philadelphia, PA 19106
215-829-0916

Attorney for plaintiff
Kimberly McLaughlin

CERTIFICATE OF SERVICE

I, Michael R. Luongo, hereby certify that on this date I have served a true and correct copy of the foregoing plaintiff's Initial Disclosures upon defendant by first class US mail upon the following:

Richard L. Strouse
Ballard Spahr
1735 Market Street
51st Floor
Philadelphia, PA 19103

Date: September 21, 2005

s/Michael R. Luongo
Michael R. Luongo