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ATTORNEY FOR DEFENDANTS: THE BARRINGTON SCHOOL DISTRICT AND
PATRICIA MOORE

**UNITED STATES DISTRICT COURT
FOR THE STATE OF NEW JERSEY**

C.H., parent and natural guardian of C.C., :
a minor; :

J.E., parent and natural guardian of G.E., :
a minor; :

L.M., parent and natural guardian of B.E., :
A minor; :

O.H., parent and natural guardian of C.F., :
a minor; :

R.L., parent and natural guardian o B.L., :
a minor; :

L.B., parent and natural guardian of S.M., :
W.P., parent and natural guardian of B.P., :

C.S., parent and natural guardian of D.S., :

P.W., parent and natural guardian of J.W., :
A minor; :

Plaintiffs :

Vs. :

THE BARRINGTON SCHOOL DISTRICT :
& PATRICIA MOORE :

Defendants and :
Third Party Plaintiffs :

Vs. :

RICHARD MORGENROTH :
100 ELKINS ROAD :
CHERRY HILL, NEW JERSEY 08034 :

Third-party Defendant :

CIVIL ACTION

DOCKET NO: 1:05-CV-5377

**AMENDED
THIRD-PARTY COMPLAINT**

**AMENDED THIRD PARTY COMPLAINT AGAINST RICHARD
MORGENROTH**

The Barrington School District and Patricia Moore, defendants in the above-entitled action, as Third-Party Plaintiffs pursuant to Rule 14 of the Federal Rules of Civil Procedure relating to third-party practice, complain of Richard Morgenroth as Third-Party Defendant and allege as follows:

1. Plaintiffs herein have commenced an action against defendants filed on or about November 14, 2005 for the causes of action set forth in the Complaint. A copy of such Complaint is attached hereto as Exhibit "A" and incorporated herein by reference.

2. Defendants/third party plaintiffs filed an Answer on January 12, 2006, a copy of which is attached hereto Exhibit "B" and incorporated herein by reference.

3. Plaintiffs allege personal injury due to negligence or carelessness, sexual harassment and discrimination resulting, inter alia, from negligent, careless, sexually harassing or discriminatory actions allegedly committed by Third-Party Defendant, Richard Morgenroth, which occurred on or during the 2003-2004 school year in the Borough of Barrington, County of Camden and State of New Jersey.

4. Third-Party defendant, Richard Morgenroth, is an individual who resides at 100 Elkins Road, Cherry Hill, within the State of New Jersey.

5. Defendant/Third-Party Plaintiffs, the Barrington School District and Patricia Moore, believe and therefore aver that Third-Party Defendant, Richard Morgenroth, if anyone, acting alone and not on behalf of Defendants and Third-Party Plaintiffs, committed the acts of negligence, carelessness, sexual harassment, or discrimination set forth in Plaintiff's Complaint and/or negligently, carelessly or intentionally contributed to the events described in Plaintiffs' Complaint and/or that

Richard Morgenroth is responsible for the injuries, damages and expenses of the plaintiffs.

6. Defendants/Third-Party Plaintiffs, the Barrington School District and Patricia Moore, believe and therefore aver that Third-Party Defendant Richard Morgenroth is alone liable to the plaintiff or is jointly and severally liable to Defendants/Third-Party Plaintiffs or is liable over to the Defendants/Third-Party Plaintiffs for any damages to which plaintiffs may be entitled as a result of these causes of action.

WHEREFORE, Defendants/Third Party-Plaintiffs, the Barrington School District and Patricia Moore, demand contribution and indemnification from Third-Party Defendant, Richard Morgenroth for the causes of action set forth in Plaintiffs' Complaint


JOHN L. MARQUESS, ESQUIRE

Attorney for Defendants/Third-Party
Plaintiffs, the Barrington School District and
Patricia Moore

Dated: February 17, 2006