

5. As will be discussed in more detail in the Brief filed in support of this Motion, Plaintiff's claim for First Amendment violations must be dismissed as Plaintiff has failed to state a claim upon which relief may be granted.

WHEREFORE, the Defendant respectfully requests that the Court grant this Motion to Dismiss and dismiss Plaintiff's Complaint with prejudice.

MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN



By: _____

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

NORTHEASTERN	:	CIVIL ACTION - LAW
PENNSYLVANIA FREETHOUGHT:	:	
SOCIETY,	:	
Plaintiff	:	JURY TRIAL DEMANDED
	:	
	:	ELECTRONICALLY FILED
vs.	:	
	:	
COUNTY OF LACKAWANNA	:	
TRANSIT SYSTEM	:	3:15-CV-00833
	:	
Defendant	:	

CERTIFICATE OF NONCONCURRENCE

Plaintiff's counsel does not concur in the relief sought in this Motion.

MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN



By: _____

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