



FILED  
MAR 18 2015  
CENTRE COUNTY, PA

2015 MAR 18 PM 2:12

IN THE COURT OF COMMON PLEAS OF  
CENTRE COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

GRAHAM B. SPANIER

Plaintiff,

v.

LOUIS J. FREEH, and  
FREEH SPORKIN & SULLIVAN, LLP,

Defendants.

) Docket No. 2013-2707  
)  
) Type of Case: Defamation  
)  
) Type of Pleading: Motion for Leave to  
) Join Additional Parties  
)  
) Filed on behalf of: Plaintiff  
)  
) Counsel of record for this party:  
)

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GRAHAM B. SPANIER,

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**PLAINTIFF GRAHAM B. SPANIER'S MOTION FOR LEAVE TO JOIN  
ADDITIONAL PARTIES**

AND NOW, Plaintiff Graham B. Spanier ("Dr. Spanier"), by and through the undersigned counsel, respectfully moves this Court, pursuant to Pa.R.C.P. 2229 and 2232, to grant Dr. Spanier leave to join as additional defendants in this action Freeh Group International Solutions, LLC ("FGIS"), and Pennsylvania State

University (“Penn State”) for the following reasons and those stated in Dr. Spanier’s accompanying Memorandum of Law:

1. Dr. Spanier commenced this defamation action against Defendants Louis J. Freeh (“Freeh”) and Freeh Sporkin & Sullivan, LLP (“FSS”) by filing a Praecipe for a Writ of Summons on July 11, 2013.

2. This action has been stayed on Dr. Spanier’s motion and by Order of the Court since February 25, 2014.

3. Contemporaneously with the filing of this Motion, Dr. Spanier also is filing a motion requesting that the Court modify the stay that is currently in place in this action to permit Dr. Spanier to file a complaint, join the additional parties and claims that are the subject of this motion, and proceed with discovery to the greatest extent possible in light of pending criminal cases.

4. Dr. Spanier seeks to join FGIS and Penn State as defendants in this action so that Dr. Spanier may bring claims against FGIS and Penn State that are interrelated with the pending defamation claims against Freeh and FSS.

5. Under Pa.R.C.P. 2232(c), the Court may permit joinder of these additional defendants at this stage of the action because such defendants could have been joined in the action originally.

6. Under Pa.R.C.P. 2229, FGIS and Penn State may be joined as defendants because the claims against FGIS and Penn State arise from the same

transaction, occurrence, or series of transactions or occurrences as the claims against Freeh and FSS, and because questions of law or fact common to all claims will arise in the action.

7. Joinder of FGIS and Penn State as additional defendants in this action will promote judicial economy, facilitate efficient discovery, and avoid a multiplicity of lawsuits on the same subject matter.

8. A copy of Dr. Spanier's Proposed Complaint is attached as Exhibit 1 to the accompanying Memorandum of Law.

WHEREFORE, for the foregoing reasons, and for the reasons stated in his accompanying Memorandum of Law, Dr. Spanier respectfully requests the entry of an order granting Dr. Spanier leave to join Freeh Group International Solutions, LLC and Pennsylvania State University as defendants in this action.

Dated: March 18, 2015

Respectfully submitted,

By: 

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*ATTORNEYS FOR APPELLEE*  
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**CERTIFICATE OF SERVICE**

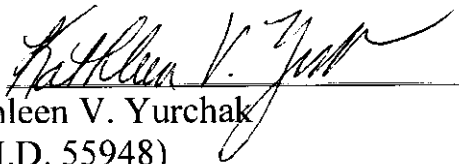
I hereby certify that a true and correct copy of the foregoing was served on the below counsel of record on March \_\_\_\_, 2015.

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Dated: March 18, 2015

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