

IN THE IOWA DISTRICT COURT IN AND FOR LEE COUNTY AT KEOKUK


DIANA R. VERDUGHT,)	Cause No. LALA006276
)	
Plaintiff,)	
)	
vs.)	
)	
LEE COUNTY IOWA,)	MOTION FOR
)	SUMMARY JUDGMENT
Defendant.)	

COMES NOW, the Lee County Iowa, Defendant herein, pursuant to Iowa R. of Civ. P. 1.981(2) and moves the Court to enter summary judgment dismissing Plaintiff's Petition for the following reasons:

1. Plaintiff is not an employee of Lee County, Iowa.
2. Lee County Iowa and the Lee County Conservation Board are separate legal entities and separate employers.
3. There is no genuine issue of material fact that Lee County Iowa took no adverse employment action against Plaintiff.

WHEREFORE said Defendants so moves.

LEE COUNTY IOWA,

By: 

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