

IKE AGWUEGBO & CO

575 LEXINGTON AVENUE 4th FLOOR, NEW YORK, NY 10022
TELEPHONE OFFICE/FAX : 646-328-1960 CELL : 908-616-2075

02/19/2015

Kevin J. Berry,
District Director,
33 Whitehall Street,
5th Floor, New York, NY, 10004

Dear Mr Berry,

RE: EEOC Charge No. 520-2014-01315 Dr Offor v. Mercy Medical Center, Catholic Health Services of Long Island – Request for Notice of Right to Sue

The undersigned represents the Charging Party in the above Charge.

The said Charge was filed with your agency on February 24th 2014. It has been over 360 days since the Charge was filed.

On behalf of the Charging Party, Dr Chinwe Offor, I hereby request that you issue a Notice of the Right to Sue so that I can proceed to file an appropriate legal action for redress.

Thank you,



Ike Agwuegbo Esq

EXHIBIT I



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
New York District Office

33 Whitehall Street, 5th Floor
New York, NY 10004-2112
District Office: (212) 336-3620

Mr. Ike Agwuegbo, Esq.
Ike Agwuegbo & Co
575 Lexington Avenue, 4th Floor
New York, New York 10022

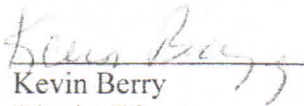
Re: *EEOC Charge No. 520-2014-01315*
Chinwe Offor v. Mercy Medical Center

Dear Mr. Agwuegbo:

This Office is in receipt of your letter dated February 19, 2015, requesting a Notice of Right to Sue be issued regarding the above-captioned charge.

As requested, enclosed herewith is the Notice of Right to Sue, affording you an opportunity to commence a private lawsuit against Respondent in Federal District Court. Upon receipt of same, the matter may be pursued by filing suit within 90 days or your right to sue will be lost.

On behalf of the Commission,


Kevin Berry
District Director

FEB 27 2015
Dated _____

EXHIBIT II

EEOC Form 161-B (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Chinwe Offor
c/o Attorney
303 Livingston Street
2nd Floor
Brooklyn, NY 11217

From: New York District Office
33 Whitehall Street
5th Floor
New York, NY 10004

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
520-2014-01315	Gwendolyn D. Hoy, Investigator	(212) 336-3723

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

- More than 180 days have passed since the filing of this charge.
- Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
- The EEOC is terminating its processing of this charge.
- The EEOC will continue to process this charge.


Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.
- The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



Kevin J. Berry,
District Director

FEB 27 2015

Enclosures(s)

(Date Mailed)

cc: Christopher G. Gegwich, Esq.
NIXON PEABODY
50 Jericho Quadrangle
Suite 300
Jericho, NY 11753

Ike Agwuegbo, Esq.
Ike Agwuegbo & Co
575 Lexington Avenue
4th Floor
New York, NY 10022

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

Subject: Subject: RE: EEOC CHARGE NO. 520-2014-01315 OFFOR VS. MERCY MEDICAL CENTER & ANOR - REQUEST FOR CASE FILE UNDER FOIA

From: Ike Agwuegbo (ike@ikeagwuegbolaw.com)

To: kevin.berry@eoc.gov; john.douglass@eoc.gov;

Cc: curia2007@yahoo.com;

Date: Wednesday, March 4, 2015 11:28 PM

Dear Sir,

The undersigned represents the charging party, Dr Chinwe Offor in the above charge.

On her behalf, I hereby request a copy of the file under **The Freedom of Information Act (FOIA), 5 U.S.C. § 552.**

Please kindly let me know how much this request will cost and I will remit the money accordingly. I will also send a hard copy of this request by registered mail.

Thank you,

Ike Agwuegbo Esq
575 Lexington Avenue,
4th Floor,
New York, NY 10022
Office Tel: 646-328-1960

Cell: 908-616-2075 website: <http://www.ikeagwuegbolaw.com/>

email : ike@ikeagwuegbolaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

EXHIBIT III



**U.S. Equal Employment Opportunity Commission
New York District Office**

33 Whitehall Street
5th Floor
New York, NY 10004
(212) 336-3620
(212) 336-3622 TTY
(212) 336-3625 FAX

March 11, 2015

SENT VIA ELECTRONIC MAIL

Ike Agwuegbo
Ike Agwuegbo & CO
575 Lexington Avenue
4th Floor
New York, NY 10022

Re: FOIA No.: 5202015285423
EEOC # : 520-2014-01315
Offor v. Mercy Medical Center & ANOR

Dear Mr. Agwuegbo:

Your request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, received by the New York District Office on March 10, 2015 is assigned the above FOIA number. It will be processed by a FOIA Team Member who can be reached at (212) 336-3653.

[X] Your unperfected request under the FOIA was received March 10, 2015. The request will not be assigned for processing until it is perfected by the submission to this office a copy of a "Filed" marked court Complaint on the above charge.

Failure to submit a copy of the "Filed" marked Complaint before **March 25, 2015** will result in the administrative withdrawal of your request.

Upon receipt of the "Filed" marked Complaint, your request will be perfected and processing will begin. At that time, EEOC will issue a letter acknowledging receipt of your perfected FOIA request, providing the name of the person who will be processing your request, and the date by which you may expect to receive a response.

Court complaints may be submitted via mail to:

NYDO FOIA Unit
33 Whitehall Street, 5th Floor
New York, NY 10004

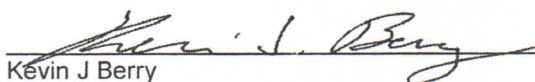
Or

via E-mail to : newyfoia@eoc.gov

EXHIBIT

IV

Cordially,


Kevin J Berry
District Director
newyfoia@eoc.gov



**U.S. Equal Employment Opportunity Commission
New York District Office**

33 Whitehall Street
5th Floor
New York, NY 10004
(212) 336-3620
(212) 336-3622 TTY
(212) 336-3625 FAX

April 14, 2015

SENT VIA ELECTRONIC MAIL

Ike Agwuegbo
Ike Agwuegbo & CO
575 Lexington Avenue
4th Floor
New York, NY 10022

Re: FOIA No.: 5202015285423
EEOC # : 520-2014-01315
Offor v. Mercy medical Center & ANOR

Dear Mr. Agwuegbo:

Your request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, received by the New York District Office on March 10, 2015 is assigned the above FOIA number. It will be processed by the NYDO Freedom Of Information Act Unit which can be reached at (212) 336-3653.

[X] EEOC will issue a determination on your request on or before May 12, 2015. FOIA and EEOC regulations provide 20 working days to issue a determination on a request, not including Saturdays, Sundays and federal holidays. In unusual circumstances, EEOC may extend the 20 working days by 10 additional working days or stop processing your request until you respond to our request for fee or clarifying information. Should EEOC take an extension or stop processing your request, notice will be issued prior to the expiration of the 20 working days.

You may contact the Requester Service Center for status updates on your FOIA request or for FOIA information by telephone to (202) 663-4500, by fax to (202) 663-4679, by e-mail to FOIA@eoc.gov, or by mail to the EEOC, Requester Service Center, 131 M Street NE, Suite 5NW02E, Washington, DC 20507. Additionally, if you submitted your FOIA request on line, you may monitor its status at <https://eqov.eoc.gov/foia/>.

Cordially,

A handwritten signature in black ink that reads "Kevin J. Berry".

Kevin J Berry
District Director
newyfoia@eoc.gov

EXHIBIT

V



**U.S. Equal Employment Opportunity Commission
New York District Office**

33 Whitehall Street
5th Floor
New York, NY 10004
(212) 336-3620
(212) 336-3622 TTY
(212) 336-3625 FAX

May 13, 2015

SENT VIA POSTAL MAIL

Ike Agwuegbo
Ike Agwuegbo & CO
575 Lexington Avenue
4th Floor
New York, NY 10022

Re: FOIA No.: 5202015285423
EEOC # : 520-2014-01315
Offor v. Mercy Medical Center & ANOR

Dear Mr. Agwuegbo:

This is in response to your request made pursuant to the Freedom of Information Act for a copy of the above-reference charge.

At this time we are unable to grant your request, because the records you seek, we are unable to locate. We have no choice after a thorough search but to consider this file lost. The EEOC will continue to look for the information requested and if found we will provide you with the information.

Sorry for any inconvenience this may cause.

The individual who processed this FOIA request is a FOIA Technician who can be reached at **(212) 336-3653**.

Sincerely,

A handwritten signature in cursive script that reads "Kevin J. Berry".

Kevin Berry
District Director

EXHIBIT

VI

Subject: Re: EEOC Charge No. 520-2014-01315 Offor v. Mercy Medical center & Anor
From: JOHN DOUGLASS (JOHN.DOUGLASS@EEOC.GOV)
To: ike@ikeagwuegbolaw.com;
Cc: VIBHA.RAVAL-GILLEN@EEOC.GOV;
Date: Tuesday, December 30, 2014 10:51 AM

Mr. Agwuegbo:

Our database reflects that the rebuttal was received and no further information is required at this time. The charge has now been assigned to Investigator Vibha Raval-Gillen. I have cc'd her on this e-mail response. Thanks. JBD

John B. Douglass
Supervisory Investigator
U.S. E.E.O.C.
New York District Office
33 Whitehall Street, 5th Floor
New York, NY 10004
212-336-3765

>>> Ike Agwuegbo <ike@ikeagwuegbolaw.com> 12/29/2014 11:00 PM >>>

Dear Mr Douglass,

I submitted the Charging Party's Rebuttal on 12/19/2014. Please kindly confirm receipt of same. Also, please let me know if you need any further clarification and/or documentary evidence. I am available by phone and email to answer any questions you may have.

Thanks,

Ike Agwuegbo Esq
575 Lexington Avenue,
4th Floor,
New York, NY 10022
Office Tel: 646-328-1960

Cell: 908-616-2075 website: <http://www.ikeagwuegbolaw.com/>

email : ike@ikeagwuegbolaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: JOHN DOUGLASS <JOHN.DOUGLASS@EEOC.GOV>
To: Ike Agwuegbo <ike@ikeagwuegbolaw.com>
Sent: Thursday, December 18, 2014 3:01 PM

EXHIBIT VII

Compose

Search results Delete Move Spam More

- Inbox (611)
- Drafts (18)
- Sent
- Spam
- Trash
- Smart Views
 - Unread
 - Starred
 - People
 - Social
 - Travel
 - Shopping
 - Finance
- Folders
- Recent

Re: EEOC CHARGE NO. 520-2014-01315 OFFOR V. MERCY MEDICAL CENTER & AN...

People

Ike Agwuegbo
To VIBHA.RAVAL-GILLEN@EEOC.GOV
CC JOHN DOUGLASS
BCC Dr. Chinwe Offor

Jan 22

Dear Investigator Raval-Gillen,

Sequel to my email dated 01/21/15, I have tried to reach you by phone without success. I know you must be quite busy, please at your earliest convenience, kindly provide me with a Status Update on your Agency's Investigation of the above Charge.

Thank you.

Ike Agwuegbo Esq
575 Lexington Avenue,
4th Floor,
New York, NY 10022
Office Tel: 646-328-1960
Cell: 908-616-2075 website: <http://www.ikeagwuegbolaw.com/>
email : ike@ikeagwuegbolaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: Ike Agwuegbo <ike@ikeagwuegbolaw.com>
To: "VIBHA.RAVAL-GILLEN@EEOC.GOV" <VIBHA.RAVAL-GILLEN@EEOC.GOV>
Cc: JOHN DOUGLASS <john.douglass@eEOC.gov>
Sent: Wednesday, January 21, 2015 6:52 AM
Subject: RE: EEOC CHARGE NO. 520-2014-01315 OFFOR V. MERCY MEDICAL CENTER & ANOR - REQUEST FOR STATUS UPDATE

Dear Investigator Raval-Gillen,

I represent the Charging Party, Dr Offor in the above Charge. I hereby request an Update on the Status of your Agency's Investigation. Please kindly let me know if you need additional information and/or clarification.

Thank you for your anticipated response.

Regards,

Ike Agwuegbo Esq
575 Lexington Avenue,
4th Floor,
New York, NY 10022
Office Tel: 646-328-1960
Cell: 908-616-2075 website: <http://www.ikeagwuegbolaw.com/>
email : ike@ikeagwuegbolaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: JOHN DOUGLASS <JOHN.DOUGLASS@EEOC.GOV>
To: Ike Agwuegbo <ike@ikeagwuegbolaw.com>
Cc: VIBHA RAVAL-GILLEN <VIBHA.RAVAL-GILLEN@EEOC.GOV>
Sent: Tuesday, December 30, 2014 10:51 AM
Subject: Re: EEOC Charge No. 520-2014-01315 Offor v. Mercy Medical center & Anor

Mr. Agwuegbo:

Our database reflects that the rebuttal was received and no further information is required at this time. The charge has now been assigned to Investigator Vibha Raval-Gillen. I have cc'd her on this e-mail

EXHIBIT VIII

- Inbox (611)
- Drafts (18)
- Sent
- Spam
- Trash
- Smart Views
 - Unread
 - Starred
 - People
 - Social
 - Travel
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 - Finance
- Folders
- Recent

RE: EEOC CHARGE NO. 520-2014-01315 OFFOR VS. MERCY MEDICAL CENTER & AN...

Ike Agwuegbo Jan 28
To VIBHA RAVAL-GILLEN
CC JOHN DOUGLASS
BCC Dr. Chinwe Offor

Dear Investigator Raval-Gillen,

I write to request a Status Update on your Investigation of the above Charge. Please, kindly let me know your anticipated time-line for the conclusion of your Investigation into the matter. I have written two previous emails to which you neither responded nor acknowledged.

Thank you,

Ike Agwuegbo Esq
575 Lexington Avenue,
4th Floor,
New York, NY 10022
Office Tel: 646-328-1960
Cell: 908-616-2075 website: <http://www.ikeagwuegholaw.com/>
email : ike@ikeagwuegholaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.



Subject: RE: EEOC CHARGE NO. 520-2014-01315 OFFOR VS. MERCY MEDICAL CENTER & ANOR

From: JOHN DOUGLASS (JOHN.DOUGLASS@EEOC.GOV)

To: ike@ikeagwuegbolaw.com;

Cc: ELECTRA.YOURKE@EEOC.GOV;

Date: Tuesday, February 3, 2015 5:37 PM

Mr. Agwegbo:

Ms. Raval-Gillen is currently on leave, but someone from her team will respond to your request. Thank you for your patience. JBD

John B. Douglass
 Supervisory Investigator
 U.S. E.E.O.C.
 New York District Office
 33 Whitehall Street, 5th Floor
 New York, NY 10004
 212-336-3765

>>> Ike Agwuegbo <ike@ikeagwuegbolaw.com> 2/3/2015 1:19 PM >>>

Dear Investigator Raval-Gillen,

The undersigned represents the Charging Party in the above Charge.
 I write to request a Status Update on your Investigation of the Charge.
 Please, kindly let me know your anticipated time-line for the conclusion of your Investigation into the matter. I have written three previous emails to which you have till date, neither responded to nor acknowledged.

Thank you,

Ike Agwuegbo Esq
 575 Lexington Avenue,
 4th Floor,
 New York, NY 10022
 Office Tel: 646-328-1960
 Cell: 908-616-2075 website: <http://www.ikeagwuegbolaw.com/>
 email : ike@ikeagwuegbolaw.com This electronic mail transmission may contain confidential or privileged information. If you believe that you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

EXHIBIT IX