

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

MUMIA ABU-JAMAL,

Plaintiff,

vs.

***FILED ELECTRONICALLY***

CIV. ACTION NO. 15-CV-00967

JOHN KERESTES, Superintendent  
State Correctional Institution Mahanoy;  
CHRISTOPHER OPPMAN, DOC  
Director of Bureau of Health Care  
Services; DR. JOHN LISIAK, SCI  
Mahanoy; DR. SHAISTA KHANUM,  
SCI Mahanoy; SCOTT SAXON,  
Physician's Assistant, SCI Mahanoy;  
Chief Health Care Administrator JOHN  
STEINHART, SCI Mahanoy;  
GEISINGER MEDICAL CENTER,

Defendants.

**PARTIAL MOTION TO DISMISS PLAINTIFF'S  
AMENDED COMPLAINT OF DEFENDANTS, DR. JOHN LISIAK,  
DR. SHAISTA KHANUM, AND SCOTT SAXON, PA-C**

Now come Defendants, Dr. John Lisiak, Dr. Shaista Khanum, and Scott Saxon, PA-C, by and through their counsel, Weber Gallagher Simpson Stapleton Fires & Newby LLP, having filed a Partial Motion to Dismiss Plaintiff's Amended Complaint, and in support thereof state that the Brief includes the Argument and Exhibits that Defendants rely upon and, therefore, Defendants incorporate their Brief into the Motion.

Respectfully submitted,

WEBER GALLAGHER SIMPSON STAPLETON  
FIRES & NEWBY LLP

BY: /s/ Caitlin J. Goodrich  
Caitlin J. Goodrich, Esquire  
cgoodrich@wglaw.com  
PA 209256

Samuel H. Foreman, Esquire  
sforeman@wglaw.com  
PA77096

WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP  
2 Gateway Center  
Suite 1450  
Pittsburgh, PA 15222  
(412) 281-4541  
(412) 281-4547 FAX

Date: March 10, 2016

**CERTIFICATE OF SERVICE**

I, Caitlin J. Goodrich, Esquire, hereby certify that on this date a true and correct copy of the foregoing **MOTION TO DISMISS** was sent by first class United States mail, postage prepaid, to the following:

Robert J. Boyle, Esq.  
277 Broadway, Suite 1501  
New York, NY 10007

Bret. D. Grote, Esq.  
Abolitionist Law Center  
PO Box 8654  
Pittsburgh, PA 15221

Laura J. Neal, Esq.  
Vincent R. Mazeski, Esq.  
Chief Counsel's Office  
Pennsylvania Department of Corrections  
1920 Technology Parkway  
Mechanicsburg, PA 17050

Suzanne Conaboy, Esq.  
John B. Dempsey, Esq.  
Daniel T. Brier, Esq.  
Myers, Brier & Kelly, LLP  
425 Spruce Street  
Suite 200  
Scranton, PA 18503

/S/ Caitlin J. Goodrich  
Caitlin J. Goodrich, Esquire

Dated: March 10, 2016