

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

GREENBERG TRaurig, P.A.,
333 SE 2nd Avenue, Suite 4400
Miami, FL 33131

and

GREENBERG TRaurig LLP,
333 SE 2nd Avenue, Suite 4400
Miami, FL 33131

Petitioners,

v.

Case No. _____

FRANCINE GRIESING,
1717 Arch Street, Suite 3630
Philadelphia, PA 19103

Respondent.

PETITION TO COMPEL ARBITRATION

Nature of Action

This is a petition under the Federal Arbitration Act, 9 U.S.C. § 4, for an order directing that Respondent submit to arbitration of a claim against Petitioners in accordance with a written agreement requiring such arbitration.

Parties

1. Petitioner Greenberg Traurig, P.A., is a Florida professional corporation whose shareholders practice law through affiliates, including Petitioner Greenberg Traurig LLP, a Florida limited liability partnership. Greenberg Traurig LLP maintains an office in Philadelphia, Pennsylvania, where some of its shareholders reside and practice law.

2. Respondent Francine Griesing is a member of the State Bar of Pennsylvania and is a citizen and resident of Pennsylvania. Between April 2007 and January 2010 she was a shareholder of Greenberg Traurig, P.A. and practiced as a lawyer in the Philadelphia office of Greenberg Traurig, LLP.

Jurisdiction and Venue

3. This action seeks to compel arbitration of a claim by Respondent against Petitioners arising under federal law. This Court has jurisdiction of the subject matter pursuant to 28 U.S.C. § 1331 and 9 U.S.C. § 4. Venue in the Eastern District of Pennsylvania is proper pursuant to 28 U.S.C. § 1391(b)(1) and (2) and 9 U.S.C. § 4 because Respondent's claim against Petitioners arises in this district and the arbitration to be compelled can be held in this district.

Statement of the Claim

4. Respondent was employed as a shareholder of Greenberg Traurig, P.A. beginning on April 12, 2007. She executed an Amended and Restated Shareholders' Agreement dated as of December 31, 2004 ("2004 Shareholders' Agreement"). Respondent remained a shareholder until her resignation on January 8, 2010. Prior to her resignation, she executed a revised Amended and Restated Shareholders' Agreement dated as of January 1, 2010 ("2010 Shareholders' Agreement").

5. The 2010 Shareholders' Agreement, as well as the 2004 Shareholders' Agreement, provides in Section 12 that any issue related to a shareholder's employment by Greenberg Traurig, P.A. or any affiliate, including Petitioner Greenberg Traurig, LLP, shall be settled by arbitration. The Agreement provides that the arbitration shall be conducted under the applicable rules of the American Arbitration Association in Miami, Florida, or in the city where the shareholder is employed by the Corporation or its affiliate.

6. Respondent has made a demand against Petitioners based upon gender discrimination in the terms of her employment in alleged violation of Title VII of the federal Civil Rights Act of 1964 (as amended), 29 U.S.C. § 2000e-(2)(a)(i), the federal Equal Pay Act, 29 U.S.C. § 201 et seq., and Section 5(a) of the Pennsylvania Human Relations Act, 43 P.S. § 955(a). Attempts to resolve that demand have been unsuccessful. Respondent has also made a demand against Petitioners on behalf of a class including, inter alia, other female shareholders of Greenberg Traurig, P.A. All such shareholders are also parties to the 2010 or 2004 Shareholders' Agreements requiring arbitration of any issue relating to a shareholder's employment by the corporation or an affiliated law firm.

7. Respondent has advised Petitioners that she intends to file, in the United States District Court for the Southern District of New York, a class action lawsuit on behalf of herself and "similarly situated" shareholders of Greenberg Traurig, P.A., seeking relief under Title VII, the Equal Pay Act, and the Pennsylvania Human Relations Act. Respondent's conduct constitutes a failure and refusal to arbitrate under a written agreement to arbitrate within the meaning of 9 U.S.C. § 4.

Relief Requested

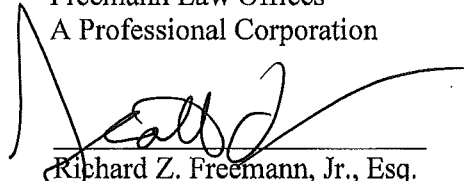
WHEREFORE, Petitioners request relief as follows:

1. That a hearing be held on this petition upon five days' notice to the Respondent, as provided by 9 U.S.C. § 4; and
2. That Respondent be ordered to submit to arbitration any and all claims against Petitioners relating to her employment by Petitioners.

Respectfully submitted,

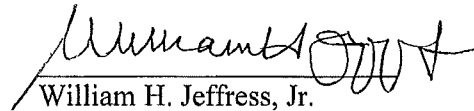
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