

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JEANNE RHOADES,)	
)	
On behalf of herself and all others)	
Similarly situated,)	
Plaintiff,)	
)	Cause No. 4:17-CV-02486
v.)	
)	
BJC HEALTH SYSTEM)	
Db a BJC HEALTHCARE, et al.)	
)	
Defendants.)	

SUPPLEMENT TO PLAINTIFF'S RESPONSE

TO DEFENDANTS' MOTION TO DISMISS

COMES NOW Plaintiff Jeanne Rhoades, and supplements her Response to Defendants' Motion to Dismiss, as follows:

Defendants submitted another portion (Section 2.01) of their personnel policies after Plaintiff filed her Response to their Motion to Dismiss. Consistent with Plaintiff's claims regarding Defendants' specific policies for "On-Call" pay, "Call-Back" pay, "Voucher" pay, and "Paid Time Off", Section 2.01 confirms that Defendants' policies:

- set forth promised "compensation" and "benefits",
- are meant to "ensure the fair and equitable treatment of our employees"
- must be abided by management and supervisors.

Section 2.01 also reiterates that Defendants may change their policies prospectively in their discretion, which is not disputed.

For the reasons stated in Plaintiff's Response, the Court should deny Defendants' Motion to Dismiss.

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via the Court's electronic filing system this 11th day of October, 2017 to all attorneys of record.

