

LACKAWANNA JURIST

JUDICIAL OPINION

CASE NAME AND NUMBER: Doe v. Career Technology Center of Lackawanna County, 2019 WL 3333866 (Lacka. Co. 2019)

DATE OF DECISION: July 18, 2019

JUDGE: Terrence R. Nealon

ATTORNEYS INVOLVED:

Michael J. Pisanchyn, Jr., Esquire, Vincent A. Savinelli, Esquire, Counsel for Plaintiff
Richard A. Polachek, Esquire, Counsel for Defendant, Career Technology Center of Lackawanna County
Karl A. Romberger, Jr., Esquire, Austin Soldano, Esquire, Counsel for Defendant, Scranton School District

SUMMARY OF OPINION:

In this tort action filed by a minor against a vo-tech school whose teacher pleaded guilty to sexually assaulting the minor during class, the minor filed a motion to stay the school's rule to file a complaint and to instead conduct pre-complaint discovery to aid in the preparation of a complaint. The school opposed the minor's pre-complaint discovery request on the ground that the minor allegedly could not state a *prima facie* case of liability, whereas the minor argued that such discovery was necessary to identify any mandatory reporters who had knowledge of the teacher's abuse of other minors prior to the subject assault. The Supreme Court has expressly held that a pleader need not establish a *prima facie* case of liability prior to obtaining pre-complaint discovery, and Pa.R.C.P. 4003.8 provides for such discovery where (1) the information sought is material and necessary to the filing of the complaint, and (2) the discovery will not cause unreasonable annoyance, embarrassment, oppression, burden or expense. Since the requested discovery could establish the liability of additional defendants under the Child Protective Services Law, and the school did not demonstrate that it would cause unreasonable annoyance, burden or expense, the minor's motion was granted and he was afforded sixty days within which to conduct his requested paper discovery and designed witness deposition.

JUDICIAL OPINION

CASE NAME AND NUMBER: Latka v. Rieder, 2019 WL 3308445 (Lacka. Co. 2019)

DATE OF DECISION: July 23, 2019

JUDGE: Terrence R. Nealon

ATTORNEYS INVOLVED:

Melissa A. Scartelli, Esquire, Counsel for Plaintiff
Robert E. Dillon, Esquire, John F. McGreevey, Esquire, Counsel for Defendant

SUMMARY OF OPINION:

Defendant in this podiatric malpractice case filed preliminary objections seeking to strike plaintiff's agency allegations for failing to identify the actual or ostensible agents by name and to set forth their authority and plaintiff's "recklessness" averments and claim for punitive damages on the basis that plaintiff "pled no facts whatsoever" to support those allegations. Since 2014, the appellate courts have consistently held that it is unnecessary for a plaintiff to identify alleged agents by name in a complaint in order to proceed forward with a vicarious liability claim against the defendant. Similarly, since 2009, those same courts have recognized that recklessness is a condition of the mind that may be averred generally under Pa.R.C.P 1019(b) and without the factual specificity advocated by defendant. Therefore, defendant's preliminary objections to plaintiff's agency allegations, recklessness averments and punitive damages claim were overruled.

ESTATES

First Notice

ESTATE NOTICE IN THE ESTATE OF MARY CATHERINE ADDIS, late of the Borough of Clarks Summit, County of Lackawanna, Commonwealth of Pennsylvania, who died on August 14, 1993. Letters of Testamentary in the above estate have been granted to the undersigned, all persons indebted to said estate are requested to make prompt payment and all having claims against said estate will present them without delay to: Ronald L. Addis., Administrator, c/o JAMI LAYAOU HEARN, ESQ., 181 West Tioga Street, Tunkhannock, PA 18657.

ESTATE OF MARJORIE I. BROWN, DECEASED, late of Scranton, Lackawanna County, Pennsylvania (Died, July 24, 2019). Notice is hereby given that Letters Testamentary have been granted in the above estate. All persons indebted to said estate are required to make payment, and those having claims or demands are to present the same without delay, to Fred Klatt, Executor, or Robert T. Gownley, Jr., Attorney for the Estate, Gallo and Gownley, Suite 900 Bank Towers, 321 Spruce St., Scranton, PA. 18503.

RE: ESTATE OF JOAN NAOMI CRAWFORD, late of Jermy, Lackawanna County, Pennsylvania (died July 3, 2019). Notice is hereby given that Letters Testamentary for the Estate of Joan Naomi Crawford have been issued to James R. Crawford, Executor of the Estate. All those having claims or demands against the Estate or indebtedness owed to the Estate shall present claims or remit payment without delay to the Executrix, or to Jeffrey W. Nepa, Attorney for the Estate, 41 N. Main Street, Suite 415, Carbondale, PA 18407.

ESTATE OF EMILIO GIORDANO, JR. a/k/a EMILIO J. GIORDANO, late of Dunmore, PA, (died 06/30/2012). Letters of Administration in the above estate having been granted, all creditors shall make demand and all debtors shall make payment without delay to Miriam Giordano, Administratrix, or John E.V. Pieski, Attorney for the Estate, 610 Maplewood Drive, Olyphant Post Office, Dickson City, PA 18447.

RE: ESTATE OF BETTY L. LYNN, late of Scranton, Lackawanna County, PA (died April 3, 2019), Letters Testamentary have been granted to the undersigned, who requests all persons having claims or demands against the Estate of the Decedent to make known the same, and all persons indebted to the Decedent to make payment without delay to: Marion L. Marcinek, Executrix, or to her attorney: Thomas J. Jones, Jr., Esquire, 410 Spruce Street, Suite 301, Scranton, Pennsylvania 18503.

NOTICE IS HEREBY GIVEN that Letters of Administration in the **ESTATE OF ELLEN T. NIELSEN A/K/A ELLEN NIELSEN**, late of Borough of Archbald, Lackawanna County, Pennsylvania, have been granted to the undersigned. All persons indebted to said estate are required to make immediate payment and those having claims shall present them for settlement to: MELISSA A. NIELSEN, CO-ADMINISTRATRIX, KARA A. NIELSEN, CO-ADMINISTRATRIX, BRENDA D. COLBERT, Esquire, COLBERT & GREBAS, P.C. 210 Montage Mountain Road-Suite A, Moosic, PA 18507.

NOTICE IS HEREBY GIVEN that Letters of Administration were granted to Maria Panunti in the **ESTATE OF JILLIAN M. PANUNTI**, late of Old Forge, Lackawanna County, Pennsylvania, who died April 14, 2019. All persons indebted to said Estate are required to make payment and those having claims or demands are to present the same

without delay unto the Administrator Maria Panunti in care of the undersigned. Patrick J. Aregood, Esq., 1218 South Main Street, Wilkes-Barre, Pa. 18706.

Notice is hereby given that Letters of Administration have been granted to Michael Petrasko, Executor of the **ESTATE OF LUCILLE B. PETRASKO**, late of Peckville, PA, who died June 13, 2019. All persons indebted to the Estate are required to make payment and those having claims or demands are to present the same without delay to the Executor or to Carl J. Poveromo, Esquire, Rinaldi & Poveromo, P.C., P.O. Box 826, Scranton, PA, 18501.

ESTATE OF LORETTA M. SIMPSON A/K/A LORETTA SIMPSON A/K/A LORI SIMPSON, late of Dunmore, Pennsylvania (died April 15, 2018). Letters of Administration have been issued to Jennifer Bronko, Administratrix of the Estate. All those having claims or demands against the Estate or indebtedness owed to the Estate shall present claims or remit payment without delay to Patrick Walsh, Esquire, attorney for the Estate at 715 N. State Street, Clarks Summit, PA 18411.

RE: ESTATE OF HELEN T. SOWA, deceased (died June 10, 2019), late of Moosic Borough, Lackawanna County, Pennsylvania. Notice is hereby given that Letters Testamentary have been granted to Barry J. Chromey, Executor of the estate. All person having claims or demands against the estate of the decedent shall make them known and present them, and all persons indebted to the decedent shall make payment thereto, without delay, to Barry J. Chromey, Executor, 506 Hideaway Drive, Moscow, PA 18444.

NOTICE IS HEREBY GIVEN that Letters Testamentary in the **ESTATE OF IRENE R. SPARACINO** late of the Borough of Taylor, Lackawanna County, Pennsylvania, have been granted to the undersigned. All persons indebted to said estate are required to make immediate payment and those having claims shall present them for settlement to: DONNA M. SPARACINO, EXECUTRIX, BRENDA D. COLBERT, Esquire, COLBERT & GREBAS, P.C., 210 Montage Mountain Road – Suite A, Moosic, PA 18507.

IN RE: **ESTATE OF GERARD F. TOMAINO, a/k/a GERARD F. TOMAINO, SR., a/k/a GERARD TOMAINO**, late of Archbald Borough, Pennsylvania, 06/04/2019. Letters in the above Estate having been granted, all person having claims or demands against the Estate of the Decedent shall make them known and present them, and all persons indebted to the said Decedent shall make payment thereof, without delay, to Debra Tomaino, Personal Representative, or to Joseph S. Toczydlowski, Jr., Esquire of the Toczydlowski Law Office, 392 North Main Street, Archbald, PA 18403.

ESTATE OF ANDREW CHRISTOPHER VOROZILCHAK, DECEASED, late of 547 LARCH ST., DUNMORE, PA 18509, (Died MARCH 11, 2019). DANIEL ANDREW VOROZILCHAK, Executor; Dante A. Cancelli, Suite 401, 400 Spruce Street, Scranton, Pennsylvania 18503, Attorney.

NOTICE IS HEREBY GIVEN that Letters Testamentary have been granted in the **ESTATE OF BENJAMIN R. WASHELESKI**, Deceased, late of 618 Miller Street, Eynon, Lackawanna County, Pennsylvania 18403, who died on May 4, 2019. All persons indebted to the Estate are requested to make payment and those having claims or demands are to present same, without delay, to the Executrix, Brenda Gocek, or Michael N. Krisa, Attorney for the Estate, 3397 Scranton/Carbondale Highway, Suite 4, Blakely, Pennsylvania 18447.

Second Notice

ESTATE OF ANN MARIE BENNETT, ESTATE NUMBER 35-2019-1017 deceased, late of Mayfield, Lackawanna County, PA: Died April 02 2017. Notice is hereby given that Letters Testamentary have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Tamara A. Bautista, 616 Lackawanna Ave. Mayfield PA, 18433.

NOTICE IS HEREBY GIVEN that Letters Testamentary have been granted in the **ESTATE OF MARY THERESA COOLBAUGH**, deceased, who died March 2, 2019, late of Moosic Borough, Lackawanna County, Pennsylvania, to Karen Gilchrist, Executrix. All persons indebted to said Estate are requested to make payment and those having claims or demands to present the same without delay to the Executrix c/o, Samuel A. Falcone, Esquire, 1170 Highway 315, Suite 1 Plains, PA 18702.

RE: **ESTATE OF WILLIAM J. HYDUCHAK**, late of Taylor, Lackawanna County, Pennsylvania (died June 20, 2019). Notice is hereby given that Letters Testamentary for the Estate of William J. Hyduchak have been issued to Tamara Semian Souter, Executrix of the Estate. All those having claims or demands against the Estate or indebtedness owed to the Estate shall present claims or remit payment without delay to the Executrix, or to John J. McGovern, Jr., Attorney for the Estate, 321 Spruce Street – Suite 201, Scranton, PA 18503.

ESTATE OF GLENNA O'BRIEN AKA GLENNA LEWIS, ESTATE NUMBER 35-2019-913 deceased, late of Scranton, Lackawanna County, PA: Died February 15 2019. Notice is hereby given that Letters Testamentary have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Heather Macarechik, 413 Eynon St. Scranton, PA 18504.

ESTATE OF VIVIAN P. MILLER, late of the Township of South Abington, Pennsylvania, (died March 9, 2019). Letters Testamentary on the above estate having been granted, all persons having claims and demands against the estate of the above decedent shall make them known and present them; all of the persons indebted to the said decedent shall make payment thereof without delay to Delilah Miller, 1934 Layton Road, Scott Township, PA 18447 or Patrick J. Lavelle, Esquire, 715 North State Street, Clarks Summit, PA 18411.

ESTATE OF JOSEPH W. NOVOTKA, ESTATE NUMBER 35-2019-1081 deceased, late of Taylor, Lackawanna County, PA: Died June 26 2019. Notice is hereby given that Letters Testamentary have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Janice A. Novotka, 421 17th Street Scranton PA, 18504.

ESTATE OF HELEN T. PAPARELLI, ESTATE NUMBER 35-2019-915 deceased, late of Eynon, Lackawanna County, PA: Died June 19 2019. Notice is hereby given that Letters Testamentary have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Joseph D. Paparelli, 350 Hill Street Peckville PA, 18452.

ESTATE OF DOLORES J. PHILLIPS, ESTATE NUMBER 35-2019-918 deceased, late of Scranton, Lackawanna County, PA: Died June 28 2019. Notice is hereby

given that Letters Administration have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Lori A. Smith 66 Market Street Pittston PA, 18640.

ESTATE OF MYRON N. PONZELY, ESTATE NUMBER 35-2019-916 deceased, late of Scranton, Lackawanna County, PA: Died January 8 2019. Notice is hereby given that Letters Testamentary have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Karen M. Ponzely Litak, 4826 Rainbow Ridge Circle Schwenksville PA, 18473.

ESTATE OF DAWN A. RACE, ESTATE NUMBER 35-2019-1020 deceased, late of Carbondale, Lackawanna County, PA: Died March 15 2019. Notice is hereby given that Letters Administration have been granted in the above Estate. All persons indebted to said Estate are required to make payments and those having claims or demands are to present the same without delay to Damian Hunter 113 Birkett Street Carbondale PA, 18407.

ESTATE OF MARY ELIZABETH SANTORSA, late of Scranton, Pennsylvania, (died June 6, 2019). Letters Testamentary on the above estate having been granted, all persons having claims and demands against the estate of the above decedent shall make them known and present them; all of the persons indebted to the said decedent shall make payment thereof without delay to Marilyn Graziano, 402 Sunrise Boulevard, Moscow, PA 18444 or Patrick J. Lavelle, Esquire, 715 North State Street, Clarks Summit, PA 18411.

NOTICE IS HEREBY GIVEN that Letters Testamentary have been granted in the **ESTATE OF JUNE T. TEEPLE** a/k/a June Teresa Teeple, Deceased, 411 Carbon Street, Archbald, Lackawanna County, Pennsylvania 18403, who died on June 19, 2019. All persons indebted to the Estate are requested to make payment and those having claims or demands are to present same, without delay, to the Co-Executors, Marianne Rosar and John J. Teeple, Jr., or Michael N. Krisa, Attorney for the Estate, 3397 Scranton/Carbondale Highway, Suite 4, Blakely, Pennsylvania 18447.

Letters Testamentary on the **ESTATE OF MARTHA J. VENDER, a/k/a MARTHA VENDER**, late of Moosic, Lackawanna County, Commonwealth of Pennsylvania, deceased (died on January 26, 2019) having been granted to the undersigned, all persons indebted to said estate are requested to make immediate payment and those having claims will present them for settlement to: Robert Vender, Executor, 740 Zermatt Drive, Hummelstown, PA 17036 , or to: Peter R. Henninger, Jr., Esq., Jones & Henninger, P.C., 339 W. Governor Rd., Ste. 201, Hershey, PA 17033.

IN RE: **ESTATE OF GARY VIOLANTI**, late of Blakely Borough, Pennsylvania, 06/20/2019. Letters in the above Estate having been granted, all person having claims or demands against the Estate of the Decedent shall make them known and present them, and all persons indebted to the said Decedent shall make payment thereof, without delay, to Gina Violanti, Personal Representative, or to Joseph S. Toczydlowski, Jr., Esquire of the Toczydlowski Law Office, 392 North Main Street, Archbald, PA 18403.

Third Notice

RE: **ESTATE OF JOHN J. BARRETT, JR.**, late of Scranton, Pennsylvania (died July 9, 2019). Notice is hereby given that Letters Testamentary for the Estate of John J. Barrett, Jr. have been issued to Robert S. McHale, Executor of the Estate. All those having claims or demands against the Estate or indebtedness owed to the Estate shall present claims or remit payment without delay to the Executor at 837 Woodlawn Street, Scranton, PA 18509 or to Robert T. Kelly, Jr., Myers, Brier & Kelly, LLP, Attorney for the Estate, 425 Spruce Street, Suite 200, Scranton, PA 18503.

ESTATE OF HELEN J. BATLUCK, Deceased. Late of: Scranton. Executor: Georgann Batluck c/o Emily A. Zettlemoyer, Esquire, Zettlemoyer Law Office, LLP, 53 North 3rd Street, Emmaus, PA 18049.

ESTATE OF MATTHEW J. DOMINES, late of Scranton, Lackawanna County, Pennsylvania (died June 26, 2019). Letters Testamentary having been granted, all persons having claims or demands against estate of decedent shall make them known and present them, and all persons indebted to said decedent shall make payment thereof without delay to Matthew P. Domines, Executor, 513 North Main Street, Old Forge, Pennsylvania 18518 and Linda Howey, Executor, 54 Williams Street, Taylor, Pennsylvania 18517 or to James J. Gillotti, of Oliver, Price & Rhodes, Attorney for the Estate, 1212 South Abington Road, PO Box 240, Clarks Summit, PA 18411.

RE: **ESTATE OF MARILYN FLOREY**, late of Scranton, Pennsylvania. Letters of Testamentary in the above estate having been granted, creditors shall make demand and debtors shall make payment to Mark S. Florey, 701 West Grove Street, Taylor, PA 18517, Executor, or to James W. Reid, Esquire, Oliver, Price & Rhodes, Attorneys for the Estate, 1212 South Abington Road, PO Box 240, Clarks Summit, PA 18411.

RE: **ESTATE OF MARY ELIZABETH GOLO**, late of Scranton, Pennsylvania. Letters of Testamentary in the above estate having been granted, creditors shall make demand and debtors shall make payment to Elizabeth Loughney, 1036 Taylor Avenue, Scranton, PA 18411, or Barbara Roberts, 203 Karen Drive, Scranton, PA 18505, Executrices, or to James W. Reid, Esquire, Oliver, Price & Rhodes, Attorneys for the Estate, 1212 South Abington Road, PO Box 240, Clarks Summit, PA 18411.

NOTICE is hereby given that the **ESTATE OF STEPHEN PREGRIM**, late of Old Forge, Pennsylvania, has been granted Letters Testamentary to Deborah Konnick, 2970 Sullivans Trail, Falls, PA 18615. Decedent having passed away on April 30th, 2019. All persons having claims or demands against the estate of the decedent shall make them known and present them and all persons indebted to said decedent shall make payment without delay to Deborah Konnick, Executrix, or Amil M. Minora, Esquire, 700 Vine Street, Scranton, PA 18510.

ESTATE OF WILLIAM A. RACK A/K/A WILLIAM RACK, late of Clifton Township, Lackawanna County, PA (May 14, 2019). Notice is hereby given that Letters Testamentary on the above Estate have been granted to Jessica M. Scurzo & Andrea M. Rack. All persons indebted to the said estate are required to make payment and those having claims to present the same without delay to the Executrices named above or to Timothy B. Fisher II, Esquire, Fisher & Fisher Law Offices LLC, Attorneys for the Estate, 525 Main Street, PO Box 396, Gouldsboro, PA 18424.

ESTATE OF RUTH RIDDLE, late of Taylor, Lackawanna County, Pennsylvania, (died July 13, 1999). Notice is hereby given that Letters of Administration have been issued to Charles Riddle, Administrator of the Estate. **MARIANNE M. STIVALA, ESQUIRE, BRIAN J. CALI & ASSOCIATES**, 103 EAST DRINKER STREET, DUNMORE, PENNSYLVANIA 18512.

ARTICLE OF INCORPORATION

NOTICE IS HEREBY GIVEN that Articles of Incorporation have been filed with the Department of State of the Commonwealth of Pennsylvania, at Harrisburg, PA on or about July 23, 2019, for:

Berger's Moving & Storage, Inc.
628 East Warren Street
Dunmore, PA 18512

The corporation has been incorporated under the provisions of the Pennsylvania Business Corporation Law of 1988, as amended.

T1-8/16

CERTIFICATE OF ORGANIZATION

NOTICE is hereby given that a Certificate of Organization for a Domestic Limited Liability Company was filed with the Department of State and approved on February 28th, 2019 for Clay Capital Investments, LLC pursuant to the Pennsylvania Limited Liability Act of 1994. The company is organized for all lawful business purposes.

T1-8/16

FICTITIOUS NAME REGISTRATION

An application for registration of the fictitious name TNT Hill, 1001 N. Keyser Ave., Scranton, PA 18504 has been filed in the Department of State at Harrisburg, PA, File Date 07/16/2019 pursuant to the Fictitious Name Act, Act 1982-295. The Name and address of the person who is a party to the registration is Thomas Hill, 1607 State Route 502, Springbrook Twp., PA 18444.

T1-8/16

FICTITIOUS NAME NOTICE

NOTICE IS HEREBY GIVEN, pursuant to the provisions of Act 295 of 1982, as amended, of intention to file, or the filing of, in the Office of the Secretary of the Commonwealth of Pennsylvania at Harrisburg, Pennsylvania, a certificate for the conduct of a business in Pennsylvania, under the assumed or fictitious name, style or designation of

Name: **The Elbow on Oak** with its principal place of business at: **419 Oak Street, Scranton, Pennsylvania 18508.**

The name and address of the entity owning or interested in said business is: **Red, White & Brew, LLC** with its principal place of business **c/o United States Corporation Agents, Inc., Lehigh County, Pennsylvania.**

Norris McLaughlin, P.A.
515 W. Hamilton Street
Suite 502
Allentown, PA 18101
Telephone: 610-391-1800

(T1-8/16)

LACKAWANNA JURIST

NOTICE

NOTICE OF ACTION IN MORTGAGE FORECLOSURE
IN THE COURT OF COMMON PLEAS OF LACKAWANNA COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW
No. 2019-03818

LOANDEPOT.COM, LLC
Plaintiff

vs.

KELLY BORELLI, in her capacity as Heir of ALBERT F. MYERS A/K/A ALBERT F. MYERS, SR, Deceased
MICHELLE MYERS, in her capacity as Heir of ALBERT F. MYERS A/K/A ALBERT F. MYERS, SR, Deceased
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE
OR INTEREST FROM OR UNDER ALBERT F. MYERS A/K/A ALBERT F. MYERS, SR, DECEASED
Defendants

NOTICE

To UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT,
TITLE OR INTEREST FROM OR UNDER ALBERT F. MYERS A/K/A ALBERT F. MYERS, SR, DECEASED

You are hereby notified that on June 21, 2019, Plaintiff, LOANDEPOT.COM, LLC, filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of LACKAWANNA County Pennsylvania, docketed to No. 2019-03818. Wherein Plaintiff seeks to foreclose on the mortgage secured on your property located at 40 BULLOCK LANE, A/K/A REAR LOCUST RIDGE ROAD, THORNHURST, PA 18424-9501 whereupon your property would be sold by the Sheriff of LACKAWANNA County.

You are hereby notified to plead to the above referenced Complaint on or before 20 days from the date of this publication or a Judgment will be entered against you.

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Notice to Defend:
North Penn Legal Services
33 North Main Street
Suite 200
Pittston, PA 18640
Telephone (570) 299-4100

Lawyer Referral Service:
Lackawanna Bar Association
233 Penn Avenue
Scranton, PA 18503
Telephone (570) 969-9600

(T1-8/16)

LACKAWANNA JURIST

NOTICE

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY
CIVIL ACTION – LAW
Action to Quiet Title
NO: 1751 OF 2019

JOYCE J. LOMMA
2800 Stafford Avenue, Unit 4465
Scranton, PA 18505
and
AQUA PENNSYLVANIA INC.
762 West Lancaster Avenue
Bryn Mawr, PA 19010
PLAINTIFFS

VS.

AMHERST INTERNATIONAL MANAGEMENT GROUP, LTD., and its successors and assigns,
DEFENDANTS
and
MERCHANTS NATIONAL BANK OF ALLENTOWN, and its successors and assigns,
DEFENDANTS

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by an attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiffs. You may lose money, or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lackawanna County Lawyer Referral Service
North Penn Legal Services
33 N. Main Street, Suite 200
Pittston, PA 18640 (T2 -8/9)