

LACKAWANNA JURIST
JUDICIAL OPINION

CASE NAME AND NUMBER: Familetti v. Thyssen Krupp Elevator, et al., 2017 WL 153494 (Lacka. Co. 2017)

DATE OF DECISION: April 28, 2017

JUDGE: Terrence R. Nealon

ATTORNEYS INVOLVED: John M. Mulcahey, Esquire, Counsel for Plaintiff
Kevin Golden, Esquire, Counsel for Defendant, Thyssen Krupp Elevator Corporation
Michael P. Perry, Esquire, Counsel for Defendants, Metropolitan Life Insurance Company,
Met Life, Inc., and Cushman and Wakefield

SUMMARY OF OPINION:

In this personal injury suit seeking damages for temporary hand and shoulder injuries and an unresolved disc herniation at C4-5, plaintiff filed a motion to preclude any evidence of her 1991 accident in which she suffered a “whiplash” injury to her neck that resolved within six weeks, and a 2002 accident in which she sustained injuries to her low back and knee. The physician who examined plaintiff on behalf of the defense pursuant to Pa.R.C.P. 4010 described plaintiffs’ past medical history as “generally benign,” concluded that plaintiff did not have reflex sympathetic dystrophy, and did not suggest that her ongoing neck symptoms were in any way related to her 1991 or 2002 accidents. To be admissible, evidence of previous medical complaints or injuries must connected to the complaints or injuries at issue, and if not, that evidence should be excluded as irrelevant and prejudicial. Moreover, since the fact that some other cause concurs with a defendant’s negligence in producing an injury does not relieve that defendant from liability unless defendant can demonstrate that such other cause would have produced the injury independently of defendant’s negligence, evidence of prior complaints or injuries is inadmissible unless defendant’s evidence furnishes the jury with an adequate basis for finding that independent of defendant’s negligence, plaintiff’s condition would be the same today. Since the defense medical evidence did not provide the jury with such a basis, evidence of plaintiff’s earlier accidents lacked the requisite connective relevance and were held to be inadmissible.

JUDICIAL OPINION

CASE NAME AND NUMBER: Welby-Cadden v. Guardian Life Insurance of America, 2017 WL 2261137 (Lacka. Co. 2017)

DATE OF DECISION: May 5, 2017

JUDGE: Terrence R. Nealon

ATTORNEYS INVOLVED: Christina Novajosky, Esquire, Counsel for Plaintiff
Steven Maniloff, Esquire, Counsel for Defendant

SUMMARY OF OPINION:

Plaintiff filed an action seeking to recover disability benefits from her employer’s insurer, and averred that her primary care physician has declared her medically incapable of performing the duties of her occupation. In its responsive pleading, the insurer referenced in its new matter the contrary medical opinions expressed by other physicians, including those medical consultants who reviewed plaintiff’s treatment records at the insurer’s request. After plaintiff generally denied many of those averments and/or demanded strict proof of the same, the insurer filed a motion for judgment on the pleadings and asserted that plaintiff’s failure to specifically deny certain averments constituted admissions that she was not totally disabled. The insurer’s motion essentially requested a pleadings determination that the opinions of certain physicians were entitled to greater weight and credibility than the contrary conclusions of plaintiff’s primary care physician. Since the credibility and weight to be attributed to the conflicting medical opinions are the sole province of the jury, the insurer’s motion for judgment on the pleadings was denied.

ESTATES

First Notice

ESTATE OF DONALD M. BAILEY, late of Scranton (died January 17, 2017), COLLETTE HOUSTON-ONG, Executrix, c/o Michael F. Bailey, Esquire, 4099 Birney Avenue, Moosic, PA 18507.

ESTATE OF MARGARET L. CONSERETTE, late of the Borough of Archbald, Lackawanna County, Pennsylvania, (died March 14, 2017). Notice is hereby given that Letters Testamentary on the above estate have been issued to Rene Bornstad and Wayne Conserette, Personal Representatives of the Estate. All persons indebted to said Estate are required to make payment and those having claims or demands to present the same without delay to the Personal Representatives or to Guy N. Valvano, Esquire, 117 W. Drinker Street, Dunmore, PA 18512, Attorney for the Estate.

ESTATE PHILLIP HODGES, file number 2016-01397, late of Fell Township, Lackawanna County, PA (Date of death: 11/15/2016). Janet Jean Zaleski was appointed Executrix on December 15, 2016. Jeffery A. Levine, Esquire, Herlands & Levine, 27 North Main Street, Suite 301, Carbondale, PA 18407.

RE: **ESTATE OF KENNETH H. HOPKINS**, late of Clarks Summit, Lackawanna County, Pennsylvania. Letters Testamentary having been granted, creditors shall make demand and debtors shall make payment to Katherine S. Hopkins, Executrix, or to David K. Brown, Esquire of Kreder, Brooks, Hailstone LLP, 220 Penn Avenue, Suite 200, Scranton, Pennsylvania 18503.

ESTATE NOTICE Re: **PAUL W. INGRAM**, late of Dalton, Lackawanna County, Pennsylvania, who died January 26, 2017. Letters Testamentary in the above Estate having been granted, 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 thereof without delay to: Kevin McGuinness, Executor, c/o Paul J. LaBelle, Esquire, 3703 Birney Avenue, Moosic, Pennsylvania 18507.

ESTATE OF SIMONE M. KIVEN, late of the City of Scranton, Lackawanna County, Pennsylvania (died April 5, 2017). Personal Representative is Eric R. Bodner. Attorney for the Estate is Kevin C. Messett, Esquire, 224 Adams Avenue, Scranton, Pennsylvania 18503.

ESTATE NOTICE Re: **DEBORAH J. KRUPSKI**, late of Scranton, Lackawanna County, Pennsylvania, who died February 10, 2017. Grant of Letters Administration in the above Estate having been granted, 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 thereof without delay to: Billie Jean Guzzon, Administratrix, c/o John T. O' Malley, Esquire, 421 South State Street, Clarks Summit, Pennsylvania 18507.

RE: **ESTATE OF MARY K. LALICKI**, NOTICE IS HEREBY GIVEN that Letters Testamentary in the ESTATE OF MARY K. LALICKI, late of the City of Scranton, Lackawanna County, Pennsylvania (Date of Death: April 12, 2017), 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: TRACI L. ADOMIAK, EXECUTRIX, BRENDA D. COLBERT, Esquire, COLBERT & GREBAS, P.C., 210 Montage Mountain Road – Suite A, Moosic, PA 18507.

ESTATE OF STEPHANIE SOKOL LINDEMANN, DECEASED, late of 113 DELAWARE STREET, ARCHBALD, PA 18403, (Died APRIL 27, 2017). SONYA SOKOL ALLEGER AND BARBARA SOKOL MARINO, Co-Executrices; Dante A. Cancelli, Esquire, Suite 401, 400 Spruce Street, Scranton, Pennsylvania 18503, Attorney.

Estate Notice is Hereby Given that Letters of Testamentary have been given to the **ESTATE OF ALFRED MURSCH, JR.**, late of the City of Scranton, Lackawanna County, Pennsylvania, who died 12/24/2016. All persons indebted to said Estate are requested to make payment and those having claims to present the same, without delay, to the Executrix, Mary Caroline Hendricks, 2230 Kelly Avenue, Scranton, Pennsylvania 18508. Justin J. Sulla, Esq.

ESTATE OF DOROTHY M. NAGURNEY, DECEASED LATE OF SCRANTON, PENNSYLVANIA (DIED MAY 5, 2017). All persons indebted to said Estate are required to make payment, and those having claims or demands to present the same, without delay, to David Nagurney, Administrator, c/o Attorney Joseph F. Gaughan, 300 Mulberry Street, Suite 303, Scranton, PA 18503.

In re: **ESTATE OF ROSE PAONE, A/K/A ROSE MARIE PAONE**, late of Archbald, Lackawanna County, PA (died June 4, 2017). Letters of Administration 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 the Estate Personal Representative, Anna Yendrey, or to Joseph S. Toczydlowski, Jr., Esquire, 392 North Main Street, Archbald, PA 18403.

ESTATE JOSEPH P. SHEROSHIK, Jr., file number 35-17-00666 late of Olyphant, Lackawanna County, PA (Date of death: 04/26/2017). Rebecca Lynn Sheroshik was appointed Testatrix on June 12, 2017. Jeffery A. Levine, Esquire, Herlands & Levine, 27 North Main Street, Suite 301, Carbondale, PA 18407.

RE: **ESTATE OF THOMAS P. WALSH**, late of Blakely, Pennsylvania (died June 28, 2013). Notice is hereby given that Letters of Administration for the Estate of Thomas P. Walsh have been issued to Francis B. Walsh, Administrator 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 Administrator at 111 Upper Knapp Road, Clarks Summit, PA 18411 or to Robert T. Kelly, Jr., Myers, Brier & Kelly, LLP, Attorney for the Estate, 425 Spruce Street, Suite 200, Scranton, PA 18503.

ESTATE KENNETH T. WEARNE, file number 35-17-00176 late of Scotts Township, Lackawanna County, PA (Date of death: 01/27/2017). April C. Wearne and Kenneth J. Wearne was appointed co-Administrators on February 13, 2017. Jeffery A. Levine, Esquire, Herlands & Levine, 27 North Main Street, Suite 301, Carbondale, PA 18407.

Second Notice

ESTATE OF MARGARET ANN ABBOTT, DECEASED, late of 320 MAIN STREET, PECKVILLE, PA 18452, (Died JUNE 2, 2017). CAROL ANN DAVIS, Executrix; Dante A. Cancelli, Esquire, Suite 401, 400 Spruce Street, Scranton, Pennsylvania 18503, Attorney.

LACKAWANNA JURIST

ESTATE OF NORA M. CRONIN deceased April 19, 2017 late of Moscow, Lackawanna County, Pennsylvania. Letters of Administration in the above-named estate having been granted to the undersigned, all persons indebted to the estate are requested to make immediate payment and those having claims are directed to present the same without delay to the undersigned or her attorney within four (4) months from the date hereof and to file with the Clerk of the Court of Common Pleas of Lackawanna County, Orphans' Court Division, a particular statement of claim, duly verified by an affidavit setting forth an address within the county where notice may be given to claimant. Breda Cronin Holmes, Administrator, 114 Vaughn Street, Olyphant, PA 18447. John J. McGee, Esq., Ste 302, 400 Spruce Street, Scranton, PA 18503.

ESTATE OF WILLIAM J. EVANS, DECEASED (died on 5/22/17). Late of Scranton, Lackawanna County, PA. Letters Testamentary have been granted and all creditors shall make demand and all debts shall make payment without delay to Walter J. Evans c/o Harry T. Coleman, Esquire, 41 N. Main Street, Carbondale, PA 18407.

THOMAS J. FALZONE, late of Dunmore, Lackawanna County, Pennsylvania, (died May 29, 2017). Notice is hereby given that Letters Testamentary on the above estate have been issued to Marianne M. Stivala, Executrix of the Estate. **MARIANNE M. STIVALA, ESQUIRE, BRIAN J. CALI & ASSOCIATES, 103 EAST DRINKER STREET, DUNMORE, PENNSYLVANIA 18512.**

ESTATE OF NANCY M. GONGLIEWSKI A/K/A NANCY E. GONGLIEWSKI, Deceased, late of 519 Broad Street, Peckville, PA 18452, (Died APRIL 28, 2017) Anthony Gongliwski, Administrator; Mark G. Rudalavage, 171 Scranton-Carbondale Highway, Eynon, Pennsylvania 18403-1027, Attorney.

ESTATE OF CARYL MANGIALASHI A/K/A CARYL R. MANGIALASHI, late of Scranton, PA (died May 19, 2017) Letters Testamentary were granted to Anne Marie Mangialashi, Executrix. Elaine C. Geroulo, Esq., Attorney for the Estate, 411 Jefferson Avenue, Scranton, PA 18510.

Notice is hereby given that Letters Testamentary have been granted in the **ESTATE OF JOSEPHINE MATRONE**, (died November 12, 2016). All persons indebted to said estate are required to make payment and those having claims or demands to present the same without delay to Norma Serino, Executrix, c/o C.J. Bufalino, III, Esquire, 1230 Memorial Highway, Suite 201, Shavertown, PA 18708.

Estate Notice is Hereby Given that Letters of Testamentary have been have been Granted in the **ESTATE OF MILDRED S. NOVAK**, late of Roaring Brook Township, Lackawanna County, Pennsylvania, who died 3/20/2017. All persons indebted to said Estate are requested to make payment and those having claims to present the same, without delay, to the Administrator, Valerie R. Bogart, 6 Devonald Drive, Asbury, NJ 08802. Justin J. Sulla, Esq.

RE: Estate of **ESTATE OF JAMES A. OLIVER, SR. A/K/A JAMES A. OLIVER**, late of Glenburn Township, Lackawanna County, and State of Pennsylvania, deceased, who died on the 29th day of April, 2017. Letters of Testamentary having been granted, all persons 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 thereof without delay to the Executors, James A. Oliver, Jr. or Nancy K. Oliver, 289 Yoder Road, Harleysville, PA 19438, or to Mattes & Mattes, P.C., 324 N. Washington Ave., Scranton, PA 18503.

ESTATE OF ELEANOR F. REICH, late of Olyphant, Pennsylvania (died June 03, 2017). Notice is hereby given that Letters Testamentary on the above Estate have been

granted to Angelo Reich, Jr., of Roaring Brook TWP, PA. and Jean Feduchak, of Nicholson, PA. All persons indebted to the said estate are required to make payment and those having claims to present the same without delay to the Executor(s) named herein, or to Nicholas D. Tellie, Esquire, Tellie & Coleman, P.C., 310 East Drinker Street, Dunmore, PA 18512.

ESTATE OF ANNA A. STACK, DECEASED, late of 629 CLAY AVENUE, SCRANTON, PA 18510, (Died APRIL 26, 2017). **JAMES S. VIEIRA, Executor; Dante A. Cancelli, Suite 401, 400 Spruce Street, Scranton, Pennsylvania 18503, Attorney.**

ESTATE OF ANN M. SHEA late of Scranton, Lackawanna County, PA (died April 2, 2017). Notice is hereby given that Letters Testamentary in the above Estate have been issued to Clement Jacklinski, Executor. Creditors shall present claims and Debtors shall make payments to Clement Jacklinski, c/o Arthur J. Rinaldi, Esquire, RINALDI & RINALDI, 2 West Olive Street, Scranton, PA 18508.

ESTATE OF JOAN A. TURKO, ALSO KNOWN AS JOAN TURKO, late of Borough of Olyphant, County of Lackawanna and State of Pennsylvania, deceased. WHEREAS, Letters Testamentary in the above-named estate have been granted to Teressa Ann Schisler, Executrix of the Estate of Joan A. Turko, also known as Joan Turko. All persons indebted to the said estate are requested to make immediate payment, and those having claims or demands to present the same without delay to Teressa Ann Schisler c/o Scott R. Steirer, Esquire. 124 Belvidere Street, Nazareth, Pennsylvania, 18064.

ESTATE OF MAFALDA TEDESCO, late of Vandling Borough, PA (died April 24, 2017) Thomas Fitzsimmons Executor and, Juliana Wildenstein Executrix, Frederick M. Moase, Jr., Attorney for the Estate, Law Offices of Frederick M. Moase, Jr., 123 East Garfield Ave, Carbondale, PA 18407.

ESTATE OF ANTHONY F. VALENTI, late of the Borough of Dunmore, Lackawanna County, Pennsylvania. Notice is hereby given that Letters Testamentary on the above estate have been issued to Anthony P. Valenti, Executor of the Estate. All persons indebted to said Estate are required to make payment and those having claims or demands to present the same without delay to the Executor or to Guy N. Valvano, Esquire, 117 W. Drinker Street, Dunmore, PA 18512, Attorney for the Estate.

RE: **ESTATE OF ELEANOR M. VOLPE**, late of the Borough Moosic, Lackawanna County, Pennsylvania (died May 20, 2017). Letters Testamentary in the above estate having been granted, all persons having claims or demands against the estate shall make them known and present them, and all persons indebted to the said decedent shall make payment thereof, without delay, to the Co-Executors, Debra Quinn and James F. Clemente, c/o Richard T. Mulcahey, Esq., 148 Adams Avenue, Scranton, PA 18503.

Third Notice

ESTATE OF JOSEPHINE D. BURDYN, late of Lackawanna County, Pennsylvania. Letters Testamentary on the above estate having been granted to Joann Bissland, all persons indebted to the said estate are requested to make payment, and those having claims to present the same without delay to her c/o Joseph Kosierowski, Esq. 400 Broad Street, Milford, Pennsylvania 18337.

LACKAWANNA JURIST

RE: **ESTATE OF LOUISE CHECK**, late of South Abington Township, Lackawanna County, Pennsylvania (died April 6, 2017). Notice is hereby given that Letters Testamentary for the Estate have been issued to James Check, 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, or to John J. McGovern, Jr., Attorney for the Estate, 321 Spruce Street - Suite 201, Scranton, PA 18503.

RE: **ESTATE OF RUTH H. FREIDENBURG**, late of Scranton, Pennsylvania. Letters Testamentary in the above estate having been granted, creditors shall make demand and debtors shall make payment to Leland D. Freidenburg, Jr., 1 Lakeside Drive, Apartment 1106, Oakland, California, Executor, or to Paul D. Horgor, Esquire, Oliver, Price & Rhodes, Attorney for the Estate, 1212 South Abington Road, P.O. Box 240, Clarks Summit, PA 18411.

ESTATE OF KATHRYN A. JOHNSON, late of Lackawanna County, Pennsylvania. Letters Testamentary on the above estate having been granted to Kathryn Gruskiewicz and Cheryl Petrosky, all persons indebted to the said estate are requested to make payment, and those having claims to present the same without delay to them c/o Joseph Kosierowski, Esq. 400 Broad Street, Milford, Pennsylvania 18337.

ESTATE OF ALDONA A. KUCY, late of the City of Scranton, Lackawanna County, Pennsylvania (died June 3, 2017). Personal Representative is Lawrence J. Kucy, Esq. Attorney for the Estate is Nancy M. Barrasse, Esquire, 224 Adams Avenue, Scranton, Pennsylvania 18503.

NOTICE IS HEREBY GIVEN that Letters Testamentary have been granted in the **ESTATE OF ELLEN LEVENTHALL**, late of Carbondale, Lackawanna County, Pennsylvania (died June 3, 2017). All persons indebted to the Estate are requested to make payment, and those having claims or demands are to present same, without delay, to Executor, Thomas A. Leventhall, or to John J. Lawler, Jr., Attorney for the Estate, 25 North Main Street, Suite Two, Carbondale, Pennsylvania 18407.

ESTATE OF JOHN W. MCDONNELL, late of the Borough of Dunmore, Pennsylvania died April 28, 2017 Co-Executors John W. McDonnell, Jr. and Kaitlyn McDonnell, Sean Gallagher Attorney for the Estate, 416 Jefferson Avenue, Scranton, PA 18510. Notice is hereby given that Letters Administration have been granted. All persons indebted to the said estate are required to make payment, and those having claims or demands are to present the same without delay to the Co-Executors name.

RE: **ESTATE OF ANNA JANE SALMON**, late of Moosic, Pennsylvania (died May 12, 2017). Notice is hereby given that Letters Testamentary for the Estate of Anna Jane Salmon have been issued to Patrick J. Salmon and Margaret Ellen Swantek, Executors 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 Executors at 2007 Cardinal Lane, Clarks Summit, PA 18411 or to Robert T. Kelly, Jr., Myers, Brier & Kelly, LLP, Attorney for the Estate, 425 Spruce Street, Suite 200, Scranton, PA 18503.

IN RE: **ESTATE OF THOMAS M. SMITH**, late of Peckville, Pennsylvania, died April 11, 2017. Notice is hereby given that Letters Testamentary, on the above estate have been granted to Debbie L. Trojanowicz. All persons indebted to the said Estate are required to make payment and those having claims to present the same without delay to the Testatrix named above or to Theresa J. Malski-Pezak, Esquire, 907 Church Street, Jessup, Pennsylvania 18434, Attorney for the Estate.

NOTICE IS HEREBY GIVEN that Letters Testamentary have been granted in the following Estate. All persons indebted to the Estate are required to make payment and those having claims or demands are required to present the same without delay to the Executrix named below: **ESTATE OF KATHY C. WEIR, LATE OF FLEETVILLE, PENNSYLVANIA, DIED JANUARY 2, 2017, ROBERT WEIR, FLEETVILLE, PENNSYLVANIA, EXECUTOR; JOSEPH G. PRICE, ESQUIRE, ATTORNEY FOR THE ESTATE, 75 GLENMAURA NATIONAL BOULEVARD, MOOSIC, PA 18507.**

ARTICLES OF DISSOLUTION

NOTICE is hereby given to all persons interested or who may be affected that **Schlasta Brothers, Inc.**, a Pennsylvania Corporation, having a registered address at RD 1, Jermyn, Pa 18433 is about to file Articles of Dissolution with the Department of State of the Commonwealth of Pennsylvania and that its Board of Directors is now engaged in winding up and settling the affairs of the corporation so that its corporate existence shall be ended by the issuance of a Certificate of Dissolution under the Pennsylvania Business Corporation Law of 1988.

Neil F. MacDonald, Esquire
t1- July 7

CERTIFICATE OF ORGANIZATION

NOTICE IS HEREBY GIVEN THAT Certificate of Organization for Domestic Limited Liability Company of **NMS Fitness, LLC** was filed with and approved by the Pennsylvania Department of State on June 20, 2017, in accordance with the provisions of the Pennsylvania Limited Liability Company Law of 1994.

JOHN J. BRIER, ESQUIRE
t1- July 7

LACKAWANNA JURIST

NOTICE

In The Court of Common Pleas
Lackawanna County
Civil Action – Law
No. 17CV1293
Notice of Action in Mortgage Foreclosure

Ditech Financial LLC f/k/a Green Tree Servicing LLC,
Plaintiff
vs.

The Unknown Heirs of Phyllis Grambo, Deceased & Donna Grambo, Solely in Her Capacity as Heir of Phyllis Grambo,
Deceased, Mortgagor and Real Owner,
Defendant(s)

To: The Unknown Heirs of Phyllis Grambo, Deceased & Donna Grambo, Solely in Her Capacity as Heir of Phyllis Grambo Deceased, Mortgagors and Real Owners, Defendant(s), whose last known address is R 1342 Penn Avenue a/k/a 1342 Rear Penn Ave., Scranton, PA 18509. This firm is a debt collector and we are attempting to collect a debt owed to our client. Any information obtained from you will be used for the purpose of collecting the debt. You are hereby notified that Plaintiff, Ditech Financial LLC f/k/a Green Tree Servicing LLC, has 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. 17CV1293, wherein Plaintiff seeks to foreclose on the mortgage secured on your property located, R 1342 Penn Avenue a/k/a 1342 Rear Penn Ave., Scranton, PA 18509, whereupon your property will be sold by the Sheriff of Lackawanna County.

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 the Complaint and notice are served, by entering a written appearance personally or by 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 for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, 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.

Northeastern PA Legal Services,
33 N. Main St., Ste. 200, Pittston, PA 18640,
570.299.4100.

Michael T. McKeever, Atty. for Plaintiff,
KML Law Group, P.C., Ste. 5000,
Mellon Independence Center,
701 Market St., Phila., PA
19106-1532, 215.627.1322.