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MAURIE B. KELLY  
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PHILIP GODLEWSKI

PLAINTIFF,

V.

BRIENNA L. DUBORGEL

DEFENDANT.

IN THE COURT OF COMMON PLEAS  
OF LACKAWANNA COUNTY

CIVIL ACTION - LAW

JURY TRIAL DEMANDED

NO.: CV-2023-1354

**DEFENDANT'S RESPONSE TO PLAINTIFF'S APPLICATION FOR AMENDMENT  
OF ORDER**

AND NOW COMES the Defendant, Brienna L. DuBorgel ("Defendant"), by and through her legal counsel, Fellerman and Ciarimboli Law PC, to hereby submit this Response in Opposition to Plaintiff's Application for Amendment and in support thereof, avers as follows:

1-16. **DENIED.** Denied. The allegations set forth in Plaintiff's Application for Amendment are conclusions of law to which no response is required. By way of further answer, and as set forth in Defendant's Brief in Opposition to be filed and incorporated fully herein, Defendant respectfully asks this Court to deny Plaintiff's Application for Amendment in its entirety.

Respectfully submitted,

**FELLERMAN & CIARIMBOLI LAW, PC**

*Molly Dempsey Clark*

By: \_\_\_\_\_

EDWARD J. CIARIMBOLI, ESQUIRE

MOLLY DEMPSEY CLARK, ESQUIRE

*Attorneys for the Defendant*

Date: May 15, 2025