

PHILIP GODLEWSKI,  
Plaintiff

v.

CHRIS KELLY, et al.  
Defendants.

: IN THE COURT OF COMMON PLEAS  
: OF LACKAWANNA COUNTY  
:  
: CIVIL DIVISION  
: JURY TRIAL DENIED  
: No.: 2021-CV-2195  
: MAURIL B. KELLY  
: CLERK OF JUDICIAL  
: SERVICES

2023 JAN 24 A 10:32

.....

**STIPULATION**

It is hereby STIPULATED and AGREED, by and between all Parties in this lawsuit as follows:

1. Defendants hereby agree not to seek any additional discovery from Plaintiff regarding the production of Plaintiff's tax returns or tax filings.
2. The Parties agree that they have resolved the following issues raised in Defendants' Third Motion for Sanctions (numbers correspond to Paragraphs in that Motion and the Court's Order dated November 14, 2022):
  - 1(a). Relating to certain tax returns.
  - 1(c). Relating to certificates, diplomas, etc., from educational institutions.
  - 1(d). Relating to documents evidencing the purchase of firearms.
  - 1(e). Relating to a verification for Plaintiff's answers to Defendants' second set of Interrogatories.
3. The Parties agree that Defendants' Third Motion for Sanctions shall be denied as moot with respect to the issues raised in paragraphs 1 (a), (c), (d) and (e), but not with respect to the issue raised in paragraph 1(b) of the Court's Order of November 14, 2022, relating to video recordings.

4. This Stipulation resolves all issues raised in Plaintiff's Motion for Protective Order and the parties agree that the motion is now moot.
5. The Parties desire an Order of Court be entered as attached hereto.

By: J. Timothy Hinton, Jr.  
J. Timothy Hinton, Jr., Esq.  
**Haggerty Hinton & Cosgrove LLP**  
1401 Monroe Ave., Suite 2  
Dunmore, PA 18509  
Attorneys for Defendants,  
*Chris Kelly, Times Shamrock  
Communications, The Scranton Times-  
Tribune, The Scranton Times, L.P.,  
and Larry Holeva*

By: /s/ Timothy M. Kolman  
Timothy M. Kolman, Esq.  
**Kolman Law, P.C.**  
414 Hulmeville Ave.  
Pennel, PA 19047  
Attorneys for Plaintiff,  
*Philip Godlewski*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

*/s/ J. Timothy Hinton, Jr., Esq.*

**J. TIMOTHY HINTON, JR., ESQUIRE  
PA I.D. 61981**

PHILIP GODLEWSKI,  
Plaintiff

v.

CHRIS KELLY, et al.  
Defendants.

: IN THE COURT OF COMMON PLEAS  
: OF LACKAWANNA COUNTY  
:  
: CIVIL DIVISION  
:  
: JURY TRIAL DEMANDED  
:  
: No.: 2021-CV-2195

.....  
**CERTIFICATE OF SERVICE**

I hereby certify that on this 18 day of January 2023, I caused to be served by electronic mail, a true and correct copy of the foregoing Stipulation upon all parties:

Timothy M. Kolman, Esq.  
414 Hulmeville Ave.  
Pennel, PA 19047  
TKolman@kolmanlaw.com  
*Attorney for Plaintiff*

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

By: *J. Timothy Hinton, Jr.*  
Timothy Hinton, Jr., Esq.  
1401 Monroe Ave., Suite 2  
Dunmore, PA 18509  
(570) 344-9845  
timhinton@haggertylaw.net  
Attorneys for Defendants,  
*Chris Kelly, Times Shamrock  
Communications, The Scranton Times-  
Tribune, The Scranton Times, L.P.,  
and Larry Holeva*