

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al.
Defendants.

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IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

CIVIL DIVISION

JURY TRIAL DEMANDED

No.: 2021-CV-2195

MAURI B. KELLY
LACKAWANNA COUNTY
2023 FEB -1 P 2:35

CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

DEFENDANTS' EXHIBIT LIST FOR FEBRUARY 6, 2023 HEARING

- A. 2010 Criminal Complaint (attached to Defendants' Second Motion for Sanctions)
- B. Guilty Plea Colloquy (attached to Defendants' Second Motion for Sanctions)
- C. Crowd Funding Campaign (attached to Defendants' Second Motion for Sanctions)
- D. Plaintiff's Supplemental Answers to Interrogatories (Set I) (attached to Defendants' Second Motion for Sanctions)
- E. Hinton's Preservation of Evidence Letter (Preserve ESI on mobile phones) - 6/8/2021 (attached to Defendants' Second Motion for Sanctions)
- F. Kolman acknowledges Exhibit E (attached to Defendants' Second Motion for Sanctions)
- G. Defendant's Interrogatories (Set I) dated 7/9/2021 (attached to Defendants' Second Motion for Sanctions)
- H. Plaintiff's Answers to Interrogatories (Set I) dated 8/20/2021 (attached to Defendants' Second Motion for Sanctions)
- I. Defendants' Request for Production of Documents (Set I) dated 7/12/21 (attached to Defendants' Second Motion for Sanctions)
- J. Plaintiff's Response to Defendants' Request for Production of Documents (Set I) dated 8/20/21 (attached to Defendants' Second Motion for Sanctions)
- K. Defendants Request for Production of Documents (Set IV) dated 6/24/22 (attached to Defendants' Second Motion for Sanctions)

- L. Plaintiff's Response to Defendants Request for Production of Documents (Set IV) – 8/22/22 (attached to Defendants' Second Motion for Sanctions)
- M. Defendants' Interrogatories (Set III) dated 11/4/22 (attached to Defendants' Second Motion for Sanctions)
- N. Plaintiff's Response to Defendants Interrogatories (Set III) dated 11/9/22 (attached to Defendants' Second Motion for Sanctions)
- O. B.D.'s Affidavit dated 10/31/22 (attached to Defendants' Second Motion for Sanctions)
- P. Letter from B.D.'s parents to Riverside School District dated 1/27/09 (attached to Defendants' Second Motion for Sanctions)
- Q. "Sex in Popa's Bed" text messages on 3/31/21 (ST 1061) (attached to Defendants' Second Motion for Sanctions)
- R. "We had sex in 40% of the homes in NEPA" text message on 3/31/21 (ST 1063) (attached to Defendants' Second Motion for Sanctions)
- S. It's been a long time since we've been under each other" text message on 3/31/21 (ST 1083) (attached to Defendants' Second Motion for Sanctions)
- T. "I think my penis got bigger" text message on 3/31/21 (ST 1089) (attached to Defendants' Second Motion for Sanctions)
- U. Phil invites B.D. to go on trip to Oklahoma with him text message on 4/2/21 (ST 1098) (attached to Defendants' Second Motion for Sanctions)
- V. Phil's "I feel better my wife is gone" text message on 3/31/2021 (ST 1041) (attached to Defendants' Second Motion for Sanctions)
- W. Phil's "very unique financial opportunity" text messages on 5/25/22 (ST 1459-1468) (attached to Defendants' Second Motion for Sanctions)

- X. Phil's Telegram post dated 2/14/21 that he will be suing the Scranton Times. . . He took the bait. (ST 295) (attached to Defendants' Second Motion for Sanctions)
- Y. Defendants' Interrogatories (Set IV) dated 11/10/22 (attached to Defendants' Second Motion for Sanctions)
- Z. Plaintiff's Response to Defendants Interrogatories (Set IV) dated 11/18/22 (attached to Defendants' Second Motion for Sanctions)
- AA. Timeline of Defendants' relevant discovery requests and Plaintiff's responses (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- BB. Telegram post of November 27, 2022 (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- CC. Text Message as supplied by twobytwo Solutions, LLC (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- DD. Report of Dennis Cheng of twobytwo Solutions LLC (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- EE. Phil's "what it used to be like" and "Hangout without any sexual stuff" texts. (ST 1135 and ST 1209) (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- FF. Plaintiff's Response to Admissions (Set I) dated 12/8/2022 (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- GG. January 5, 2023 email from Kolman Law with signed verification and Plaintiff's Supplemental Responses to Requests for Production of Documents (Set I and Set III) (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion

for Sanctions)

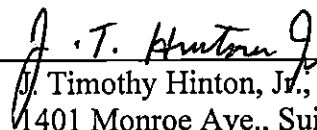
- HH. Screen shot pictures of Harvard Certificate from Phil's videos (ST 1829-1830) (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- II. December 20, 2022 letter and email from Regent University (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)
- JJ. December 8, 2022 email from Attorney Hinton to Kolman Law regarding Amended Request for Tangible Things (attached to Supplement to Defendants' Second Motion for Sanctions and Third Motion for Sanctions)

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

Date: 2/1/2023

By: _____


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Attorneys for Defendants,

*Chris Kelly, The Scranton Times, L.P. and
Larry Holeva*

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, TIMES SHAMROCK
COMMUNICATIONS, THE SCRANTON
TIMES-TRIBUNE, LARRY HOLEVA
Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February 2023, I caused to be served by electronic mail, a true and correct copy of the foregoing Defendants' Exhibit List for February 6, 2023

Hearing upon the following:

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

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

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