

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al.
Defendants.

MAURI B. KELLY
LACKAWANNA COUNTY
IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

2023 FEB -2 P 2:45

CIVIL DIVISION

CLERK OF JUDICIAL
RECORDS CIVIL DIVISION
JURY TRIAL DEMANDED

No.: 2021-CV-2195

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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.

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