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| PHILIP GODLEWSKI, | : | IN THE COURT OF COMMON PLEAS |
| | : | OF LACKAWANNA COUNTY, PA |
| Plaintiff, | : | 2021 |
| | : | No: 2022-cv-2195 |
| v. | : | |
| | : | |
| CHRIS KELLY et al., | : | |
| | : | JURY TRIAL DEMANDED |
| Defendants. | : | |

ORDER

AND NOW, this ___ day of _____ 2023, upon consideration of Plaintiff's Motion for Protective Order, it is hereby ORDERED as follows:

1. Defendants shall file an Answer in Opposition to the Motion for Leave to Conduct Discovery Relating to Punitive Damages within 20 days of the date of service of this **ORDER**.

Oral argument shall be held on the __ day of _____ 2023 at _____ o'clock __M in Courtroom _____ of the Lackawanna County Courthouse.

BY THE COURT:

, J.

KOLMAN LAW, P.C.
Timothy M. Kolman, PA51982
414 Hulmeville Avenue
Pennel, PA 19047
(215) 750-3134

Attorney for Plaintiff

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| PHILIP GODLEWSKI, | : | IN THE COURT OF COMMON PLEAS |
| Plaintiff, | : | OF LACKAWANNA COUNTY, PA |
| | : | 2021 |
| v. | : | No: 2022 -cv-2195 |
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| CHRIS KELLY et al., | : | |
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MAURICE D. KELLY
LACKAWANNA COUNTY
2023 NOV 23 A 10 13
CLERK OF SUPERIOR COURT
RECORDS & MAIL ROOM

**PLAINTIFF'S MOTION FOR LEAVE TO CONDUCT DISCOVERY
RELATING TO PUNITIVE DAMAGES**

COMES NOW, Plaintiff, Philip Godlewski, by and through his counsel, Timothy M. Kolman, Esquire, and makes the following Motion:

1. The Pennsylvania Rules of Civil Procedure permit a party, upon leave of court, to seek discovery of the wealth of a defendant where there is a claim for punitive damages. Pa.R.C.P. 4003.7.
2. An order permitting discovery of the wealth of the defendant must set forth appropriate restrictions as to the time of the discovery, scope of discovery, and dissemination of the material discovered. Pa.R.C.P. 4003.7.
3. Plaintiff has asserted claims for relief against all defendants in the form of punitive damages.
4. The parties have stipulated that Plaintiff will be considered a public figure subject to the actual malice standard requiring proof of intentional or reckless conduct on the part of Defendants.

5. A finding of actual malice to the jury would, by virtue of the requirement of demonstrating intentional or reckless conduct, open the door to consideration of punitive damages.

6. Plaintiff is entitled to discovery of Defendants wealth as evidence of wealth is relevant to the jury's formulation of a punitive damage award sufficient to deter future intentional or reckless conduct.

7. Plaintiff intends to serve upon each individual Defendant a set of Interrogatories in the form attached hereto as Exhibit 1.

8. Plaintiff intends to serve The Scranton Times, L.P. a set of Interrogatories in the form attached hereto as Exhibit 2.

WHEREFORE, Plaintiff, Philip Godlewski respectfully requests that the Honorable Court grant his Motion for Leave to Conduct Discovery Relating to Punitive Damages and enter an Order providing the following relief:

A. Permitting Plaintiff to serve upon each Defendant interrogatories in the forms attached to Plaintiff's Motion as Exhibits 1 and 2.

B. Providing such restrictions on dissemination as the Court may deem appropriate.

C. Such other relief as the Court may deem just.

Respectfully submitted,

KOLMAN LAW, PC

/s/ Timothy M. Kolman

Timothy M. Kolman, PA51982

414 Hulmeville Avenue

Pennel, PA 19047

(215) 750-3134

Attorney for Plaintiff.

COMBINED CERTIFICATE

I Timothy M. Kolman, Esquire, HEREBY CERTIFY that I have, this 16th day of February 2023, served a true and correct copy of the foregoing document by email upon the following:

J. Timothy Hinton, Esquire
timhinton@haggertylaw.net
Counsel for Defendants

I 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/ Timothy M. Kolman
Timothy M. Kolman, PA 51982

MARIE B. KELLY
CLERK OF JUDICIAL
BUSINESS DIVISION
2023 FEB 23 A 9:15

EXHIBIT

1

| | | |
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| PHILIP GODLEWSKI, | : | IN THE COURT OF COMMON PLEAS |
| Plaintiff, | : | OF LACKAWANNA COUNTY, PA |
| | : | |
| v. | : | No: 2022-cv-2195 |
| | : | |
| CHRIS KELLY et al., | : | |
| Defendants. | : | JURY TRIAL DEMANDED |

**PLAINTIFF'S INTERROGATORIES TO DEFENDANT CHRIS KELLY
REGARDING PUNITIVE DAMAGES**

INTERROGATORIES PROPOUNDED BY PLAINTIFF AND DIRECTED TO DEFENDANT CHRIS KELLY REGARDING PUNITIVE DAMAGES.

You are required to answer these Interrogatories within 30 days after their service upon you:

DEFINITIONS

A. As used herein, the words "you" and "your" refer to defendants and defendants 'agents, representatives, attorneys and all other persons acting or purporting to act on behalf of defendant.

B. As used herein, the word "document" shall mean the original and any copy, regardless of origin or location, or any book, pamphlet, periodical, letter, memorandum, telegram, report, study, handwritten note, working paper, or any other written, recorded, punched, or taped matter, however produced, to which you have or have had access. C. As used herein, "corporation," "company" or "entity" shall mean any corporation, partnership, sole proprietorship, company, entity or business operation.

D. As used herein, "communication" shall mean all conversations, whether oral or written, all telephone calls, telegrams, letters, memoranda, documents, discussions or any other form of communication.

E. As used herein, "identify" or "identity" used in reference to an individual or person means to state his full name, present business and private addresses and telephone numbers, his present or last known occupation, his employer, and employer's address.

F. As used herein, "identify" or "identity" when used in reference to a corporation, company, entity or institution means to state its full name and present address and telephone numbers, any fictitious names under which it operates, and the present owners, officers and directors thereof with their current addresses.

G. As used herein, "identify" or "identity" when used in reference to a document or communication means to state the date, author, type of document or communication (e.g., letter, memorandum, telegram, chart, etc.) or any other means of identifying it, its present location, and the name and address of its custodian. If any such document or communication was, but is no longer, in your

possession or subject to your control, state what disposition was made of it and who presently has it.

H. If a precise value amount or date cannot be supplied in response to an Interrogatory, provide an approximate value, amount or date.

INTERROGATORIES

1. State your full name, address, age, telephone number and Social Security number.
2. What other names do you use, if any?
3. State the name(s), address(es) and age(s) of your present and/or former spouse and your children, if any.
4. With whom do you live?
5. Identify each of your dependents, if any.
6. What is your occupation?
7. If you work for someone else, state the name of your employer, the address where you work, the type of work you do, your gross pay per week and your take-home pay per week. If you receive commissions from your employer, state the average amount of such commissions you receive each week.
8. If you are self-employed, state the nature of your self-employment; the address of your office or place of business; the fictitious name under which you trade, if any; your average gross annual earnings; and your average net annual earnings.
9. Are you associated in a business or professional partnership or joint venture? If so, identify the partnership or joint venture and the members thereof; the nature of the business; the percentage of your interest; the estimated value of your interest; your average gross and net annual compensation; all documents relating to the formation and governance of the partnership or joint venture.
10. Are you a principal of a closely held corporation? If so, identify the corporation; the stockholders, directors and officers, and their relationship to you, if any; the nature of the business; the number of shares and par value of the stock held by you and each of your fellow stockholders; any restrictions on the transfer of your stock; the market or repurchase value of your interest in the corporation; all documents relating to your purchase and ownership of stock in the corporation; all documents relating to incorporation of the corporation, bylaws and stockholders agreements.

11. State your gross taxable income as shown by your Federal Income Tax returns for the years 2016 through 2021.
12. What is your present average monthly income from all sources?
13. What is the present average monthly income of your household from all sources?
14. Do you pay rent for your present living quarters? If so, state the name and address of your landlord and the amount of rent you pay per month.
15. Do you own the home in which you now live? If so, state:
 - a. Who has title to the home in which you now live?
 - b. When was the property purchased, what was the purchase price, by whom was it paid and what was the source of the funds used?
 - c. Is there a mortgage on the property? If so, state the name and address of the mortgagee, the amount of the original mortgage, the amount of the current mortgage balance, and the monthly mortgage payments.
 - d. What is the current market value of the home in which you live?
16. Do you own any interest in any other real estate in this state or elsewhere either individually or jointly with another individual or entity? If so, as to each such interest state:
 - a. The full address and location of the real estate;
 - b. The market value of the real estate;
 - c. The nature and extent of your interest in the real estate, including joint, reversionary, remainder, leasehold, contingent or beneficial interest;
 - d. The name, address and telephone number of any joint owner;
 - e. The date you acquired your interest;
 - f. The amount and source of the funds which you paid to acquire such interest;
 - g. The identity of all documents which relate to your interest in the real estate and the source of funds used to purchase the interest (including statements, passbooks, check registers, etc.);
 - h. If there are any mortgages on such real estate, state as to each mortgage:

- i. The identities of the mortgagee, the mortgagor and the real owner;
 - j. The identity of all documents relating to the mortgage and the underlying obligation;
 - k. The amount of the original mortgage obligation;
 - l. The outstanding obligation of the mortgage;
 - m. The date on which the mortgage was executed; and
 - n. The date on which and the office in which the mortgage was recorded. (i) If an interest is held in trust for you, identify the trust or trustee and identify any documents relating thereto.
17. Have you, or has anyone on your behalf, conveyed or transferred any interest in any real estate to anyone within the last 5 years? If so, as to each conveyance or transfer state:
- a. The description of the real estate;
 - b. The interest which you conveyed or transferred;
 - c. The identity of the person to whom you conveyed or transferred that interest;
 - d. The consideration which you received;
 - e. The reason for the conveyance or transfer;
 - f. The fair market value of your interest in the property at the time of its conveyance or transfer by you.
18. Do you hold a mortgage on or other security interest in any real estate? If so, as to each such mortgage or other security interest state:
- a. The description of the real estate;
 - b. The date when you acquired the mortgage or other security interest;
 - c. The identity of the assignor of the mortgage or other security interest, if any;
 - d. The outstanding balance due on the note or obligation which the mortgage or other security interest secures;
 - e. The identities of the mortgagor(s), or party(ies) granting the security interest, and the real owner(s);
 - f. The identity of any documents which relate to the mortgage or other security interest; and

g. The priority of the mortgage or other security interest.

19. Do you own a motor vehicle or any interest in a motor vehicle either individually or jointly with another person or entity? If so, state as to each such vehicle:

a. The make, model, year, color, and serial number of the motor vehicle;

b. Whose name appears on the registration or title certificate;

c. The location and current custodian of the motor vehicle;

d. The purchase price of the motor vehicle;

e. The balance due on any outstanding purchase money security interest in the motor vehicle, and the name and address of the secured party;

f. Each person who paid any part of the purchase price or who has repaid or is repaying any part of a purchase money loan, and the amount and source of the funds paid;

g. The market value of the motor vehicle;

h. The identity of all documents relating to purchase of the motor vehicle, evidence of title or registration of ownership;

i. The nature and value of your interest in the motor vehicle.

20. Identify all items of tangible personal property having a value of \$100 or more which you own either individually or jointly with another person or entity including, but not limited to, jewelry, furs, furniture, office equipment, television sets, radios, record players, electrical appliances, power tools, photographic equipment, works of art, musical instruments, coin or stamp collections, silver or china; and for each item state the purchase price and date of purchase; the approximate value of each item; the seller of each item; by whom each item was purchased; the source of funds used to purchase each item; the nature and extent of your interest in each item; the name, address and telephone number of any joint owner; the location of each item; the amount due on any outstanding purchase money security interest, conditional sales agreement, lease/sale agreement, or other encumbrance; the name and address of the secured party, conditional seller or lessor; and all documents relating to the purchase and ownership of each item.

21. Do you own or have any interest in any corporate stocks, bonds, or other investment contracts, including any option to purchase or sell a security, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? If so, as to each such interest state:

- a. The identity of such stock, bond or security;
 - b. The name in which such stock, bond or security is held;
 - c. The par or face value of such stock, bond or security;
 - d. The market value of such stock, bond or security;
 - e. The name, address and telephone of the custodian of such stock, bond or security;
 - f. By whom such stock, bond or security was purchased and the source of funds used to purchase such stock, bond or security;
 - g. The name, address and telephone number of any joint owner;
 - h. The date(s) on which interest is payable on any bonds;
 - i. The maturity date of any bond; and
 - j. The identity of any documents which relate to the purchase and ownership of such stock, bond or security including the actual stock, bond and securities certificates.
22. Identify any pension or 401(k) plan in which you have an interest; the nature of your interest; the dollar amount or value of your interest; and all documents relating thereto.
23. Do you own or maintain any savings or checking accounts, certificates of deposit, money market accounts, mutual fund accounts, or IRA or Keogh accounts, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? If so, as to each such account or certificate state:
- a. The identity of the institution in which you have the account;
 - b. The title and number or identifying reference of the account or certificate;
 - c. The identity of any joint owner of the account or certificate and the nature of your joint ownership;
 - d. The nature of the account or certificate; and
 - e. The purchase price of the certificate;
 - f. The dates and amounts of your deposits or contributions for the last 5 years;
 - g. The dates and amounts of your withdrawals for the last 5 years;
 - h. The current balance of the account or value of the certificate.

24. Do you have any safe deposit box or other similar storage facility in your name (either individually or jointly with another individual or entity), in the name of any entity in which you have any ownership or other involvement (either alone or jointly with another entity or individual) or in which you have contained personal property with a value in excess of \$100? If so, as to each such box or facility state:
- a. The identity of the institution in which you rent or maintain such safe deposit box or facility;
 - b. The number under which such safe deposit box or facility is rented;
 - c. The name under which such safe deposit box or facility is rented; and
 - d. The contents of such safe deposit box or facility.
25. Identify any seat owned by you either individually or jointly with another person or entity in any stock commodity or other exchange; the estimated value of the seat; by whom the seat was purchased and the source of the funds used to purchase the seat; the name in which the seat is held; the name of the joint owner; and all documents relating to the purchase and ownership of the seat, and membership rules of the exchange.
26. Do you have any interest in any patent, copyright, or royalties or in any patentable invention or copyrightable material? If so, identify:
- a. The patent, copyright, or royalties or the patentable invention or copyrightable material;
 - b. The nature of your interest;
 - c. The dollar amount or value of your interest;
 - d. The identity of any documents relating to your interest.
27. Have you any uncollected debts, accounts receivable, or other monies that are due you? If so, for each please state.
- a. The identity of the debtors;
 - b. The date the debt was created;
 - c. The amount of the remaining debt;
 - d. The terms of repayment, including the date on which the debt is due;
 - e. The identity of any document which creates, evidences, or refers to the debt.

28. Are there any unsatisfied judgments of record in your favor in any action or have any judgments been assigned to you by anyone? If so, for each please state:

- a. The identity of the judgment debtor;
- b. The identity of the suit, action, or legal proceedings relating to the judgment, including the caption, the court in which it is filed, and the court term and number;
- c. The identity of the assignor, if any;
- d. The nature of the judgment;
- e. The status of the judgment and any execution proceedings.

29. Do you hold any security interest in or lien on personal property? If so, as to each such security interest or lien, state:

- a. The description of the personal property, including the identity of present owner;
- b. The nature and amount of the security interest or lien, including the identification of any court action involved;
- c. The date when you acquired the security interest or lien;
- d. The obligation secured by such security interest or lien;
- e. The identity of any documents which relate to the security interest or lien.

30. Have you any right, interest, financial advantage or prospect thereof under any contract, insurance or other claim, cause of action or pending lawsuit in the courts of this or any other state or in the federal courts? If so, for each please state:

- a. The identity of the contract, insurance claim, cause of action or pending lawsuit, and any documents relating thereto;
- b. The identity of the other party or parties involved;
- c. The nature and current status of the contract, claim, cause of action, or lawsuit;
- d. The known or estimated value of the same.

31. Are you the beneficiary of any trust? If so, identify the name, address and telephone number of the trustee, the duration of the trust and your interest therein, the amount of income you receive from the trust annually, the amount of principal to which you are entitled upon

distribution, the date of distribution, and the identity of all documents relating to the creation of the trust.

32. Have you received any money, or interest in real or personal property under any will or inheritance, or have you been notified of any interest in any decedent's estate? If so, identify the decedent, the executor or administrator, the nature and value of your bequest, devise, legacy or distributive share, and the date of distribution or expected distribution.
33. Do you have a will? If so, identify the property, real or personal, which is specifically devised, bequeathed or otherwise disposed of by your will, and the person named as executor.
34. Do you have any title insurance, casualty insurance, collision insurance, homeowners insurance or other insurance against loss or damage to property? If so, identify each policy, the issuer, and the property, real or personal, which is insured thereby.
35. Are you the beneficiary under an insurance policy on the life of any other person? If so, identify the policy, the issuer, the insured, the amount of the policy, the current value of the policy and any other beneficiaries.
36. Do you have any insurance on your own life? If so, identify the policy, the issuer, the amount of the policy, and the amount of premiums remaining to be paid.
37. Do you own or have an interest in any other assets not already disclosed? If so, please identify the same and the current location.
38. Identify each item of tangible personal property which you have in pawn; the name and address of the pawn broker; the value of the item; the amount of the pawn; and the terms of redemption.
39. Identify each item of tangible or intangible personal property owned by you either individually or jointly with another person or entity which is subject to any outstanding security interest; the name and address of the secured party; the security agreement; the balance due on the underlying obligation.
40. Have you sold, assigned, given or traded any tangible or intangible personal property or interest in personal property with a value of \$100 or more to anyone within the last 5 years? If so, as to each transfer, please state:
 - a. The description of the property;
 - b. The interest which you transferred;
 - c. The identity of the person to whom you transferred the property or interest therein;

- d. The date of the transfer;
- e. The consideration you received for each transfer;
- f. The reason for such transfer;
- g. The fair market value of the interest at the time of your transfer.

41. What money have you received and what money have you spent since September 25, 2019?

42. Do you owe any federal, state or local taxes? If so, identify each taxing authority, the period for which taxes are due, and the amount of taxes due.

43. Are you owed any federal, state or local tax refund? If so, identify each taxing authority, the period for which taxes are due you and the exact or estimated amount of the refund.

44. Do you make, or are you under obligation or order to make, any child or spousal support payments? If so, please specify for each such payment obligation:

- a. The identity of the recipient;
- b. The identity of any court action relating such payments or obligations;
- c. The amount of such payments or obligation;
- d. The payment and delinquency history of such payments in the last two years.

45. Do you owe anyone money? If so, identify each creditor by name and address, the amount due, and the terms of repayment.

46. Are you a member of any clubs? If so, identify each club, the amount of club dues, and whether the dues have been paid and by whom.

47. Are there any pending suits, actions, legal proceedings or claims of any kind against you or any interest you hold? If so, as to each state the following:

- a. The identity of the suit, action or legal proceeding including the title, the court in which it was filed, and the court term and number;
- b. The identity of the other party or claimant;
- c. The nature of the suit, action, proceeding or claim;

- d. The known or estimated value of the same;
 - e. The current status of the suit, action, proceeding or claim.
48. Other than the judgment in this case, are there any judgments on record against you or any company or entity in which you have an interest? If so, for each judgment please state:
- a. The identity of the suit, action or legal proceedings relating to the judgment, including the title, the court in which it is filed, and the court term and number;
 - b. The amount and date of the judgment;
 - c. The identity of the individual or entity in whose favor the judgment exists;
 - d. Have payments been made on account thereof by you or by any third party, person or entity for you?
 - e. If the answer to item (d) is yes, please identify amounts paid and the party, person or entity who paid them.
 - f. Was the judgment satisfied and the satisfaction recorded?
 - g. If answer to (f) is no, state why.
49. Is any judgment creditor currently attempting to execute on any judgment or secure information to aid in execution of any judgment? If so, as to each creditor, please specify:
- a. The identity of the judgment creditor;
 - b. Amount of judgment;
 - c. Nature of the current activities by the judgment creditor.
50. List any other liabilities or obligations not already disclosed.

Respectfully submitted,

KOLMAN LAW, PC

/s/ Timothy M. Kolman
Timothy M. Kolman, PA51982
414 Hulmeville Avenue
Pennel, PA 19047
(215) 750-3134
Attorney for Plaintiff.

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| Defendants. | : | JURY TRIAL DEMANDED |

**PLAINTIFF'S INTERROGATORIES TO DEFENDANT LARRY HOLEVA
REGARDING PUNITIVE DAMAGES**

INTERROGATORIES PROPOUNDED BY PLAINTIFF AND DIRECTED TO DEFENDANT LARRY HOLEVA REGARDING PUNITIVE DAMAGES.

You are required to answer these Interrogatories within 30 days after their service upon you:

DEFINITIONS

A. As used herein, the words "you" and "your" refer to defendants and defendants 'agents, representatives, attorneys and all other persons acting or purporting to act on behalf of defendant.

B. As used herein, the word "document" shall mean the original and any copy, regardless of origin or location, or any book, pamphlet, periodical, letter, memorandum, telegram, report, study, handwritten note, working paper, or any other written, recorded, punched, or taped matter, however produced, to which you have or have had access. C. As used herein, "corporation," "company" or "entity" shall mean any corporation, partnership, sole proprietorship, company, entity or business operation.

D. As used herein, "communication" shall mean all conversations, whether oral or written, all telephone calls, telegrams, letters, memoranda, documents, discussions or any other form of communication.

E. As used herein, "identify" or "identity" used in reference to an individual or person means to state his full name, present business and private addresses and telephone numbers, his present or last known occupation, his employer, and employer's address.

F. As used herein, "identify" or "identity" when used in reference to a corporation, company, entity or institution means to state its full name and present address and telephone numbers, any fictitious names under which it operates, and the present owners, officers and directors thereof with their current addresses.

G. As used herein, "identify" or "identity" when used in reference to a document or communication means to state the date, author, type of document or communication (e.g., letter, memorandum, telegram, chart, etc.) or any other means of identifying it, its present location, and the name and

address of its custodian. If any such document or communication was, but is no longer, in your possession or subject to your control, state what disposition was made of it and who presently has it.

H. If a precise value amount or date cannot be supplied in response to an Interrogatory, provide an approximate value, amount or date.

INTERROGATORIES

1. State your full name, address, age, telephone number and Social Security number.
2. What other names do you use, if any?
3. State the name(s), address(es) and age(s) of your present and/or former spouse and your children, if any.
4. With whom do you live?
5. Identify each of your dependents, if any.
6. What is your occupation?
7. If you work for someone else, state the name of your employer, the address where you work, the type of work you do, your gross pay per week and your take-home pay per week. If you receive commissions from your employer, state the average amount of such commissions you receive each week.
8. If you are self-employed, state the nature of your self-employment; the address of your office or place of business; the fictitious name under which you trade, if any; your average gross annual earnings; and your average net annual earnings.
9. Are you associated in a business or professional partnership or joint venture? If so, identify the partnership or joint venture and the members thereof; the nature of the business; the percentage of your interest; the estimated value of your interest; your average gross and net annual compensation; all documents relating to the formation and governance of the partnership or joint venture.
10. Are you a principal of a closely held corporation? If so, identify the corporation; the stockholders, directors and officers, and their relationship to you, if any; the nature of the business; the number of shares and par value of the stock held by you and each of your fellow stockholders; any restrictions on the transfer of your stock; the market or repurchase value of your interest in the corporation; all documents relating to your purchase and ownership of stock in the corporation; all documents relating to incorporation of the corporation, bylaws and stockholders agreements.

11. State your gross taxable income as shown by your Federal Income Tax returns for the years 2016 through 2021.
12. What is your present average monthly income from all sources?
13. What is the present average monthly income of your household from all sources?
14. Do you pay rent for your present living quarters? If so, state the name and address of your landlord and the amount of rent you pay per month.
15. Do you own the home in which you now live? If so, state:
 - a. Who has title to the home in which you now live?
 - b. When was the property purchased, what was the purchase price, by whom was it paid and what was the source of the funds used?
 - c. Is there a mortgage on the property? If so, state the name and address of the mortgagee, the amount of the original mortgage, the amount of the current mortgage balance, and the monthly mortgage payments.
 - d. What is the current market value of the home in which you live?
16. Do you own any interest in any other real estate in this state or elsewhere either individually or jointly with another individual or entity? If so, as to each such interest state:
 - a. The full address and location of the real estate;
 - b. The market value of the real estate;
 - c. The nature and extent of your interest in the real estate, including joint, reversionary, remainder, leasehold, contingent or beneficial interest;
 - d. The name, address and telephone number of any joint owner;
 - e. The date you acquired your interest;
 - f. The amount and source of the funds which you paid to acquire such interest;
 - g. The identity of all documents which relate to your interest in the real estate and the source of funds used to purchase the interest (including statements, passbooks, check registers, etc.);
 - h. If there are any mortgages on such real estate, state as to each mortgage:

- i. The identities of the mortgagee, the mortgagor and the real owner;
 - j. The identity of all documents relating to the mortgage and the underlying obligation;
 - k. The amount of the original mortgage obligation;
 - l. The outstanding obligation of the mortgage;
 - m. The date on which the mortgage was executed; and
 - n. The date on which and the office in which the mortgage was recorded. (i) If an interest is held in trust for you, identify the trust or trustee and identify any documents relating thereto.
17. Have you, or has anyone on your behalf, conveyed or transferred any interest in any real estate to anyone within the last 5 years? If so, as to each conveyance or transfer state:
- a. The description of the real estate;
 - b. The interest which you conveyed or transferred;
 - c. The identity of the person to whom you conveyed or transferred that interest;
 - d. The consideration which you received;
 - e. The reason for the conveyance or transfer;
 - f. The fair market value of your interest in the property at the time of its conveyance or transfer by you.
18. Do you hold a mortgage on or other security interest in any real estate? If so, as to each such mortgage or other security interest state:
- a. The description of the real estate;
 - b. The date when you acquired the mortgage or other security interest;
 - c. The identity of the assignor of the mortgage or other security interest, if any;
 - d. The outstanding balance due on the note or obligation which the mortgage or other security interest secures;
 - e. The identities of the mortgagor(s), or party(ies) granting the security interest, and the real owner(s);
 - f. The identity of any documents which relate to the mortgage or other security interest; and
 - g. The priority of the mortgage or other security interest.

19. Do you own a motor vehicle or any interest in a motor vehicle either individually or jointly with another person or entity? If so, state as to each such vehicle:
- a. The make, model, year, color, and serial number of the motor vehicle;
 - b. Whose name appears on the registration or title certificate;
 - c. The location and current custodian of the motor vehicle;
 - d. The purchase price of the motor vehicle;
 - e. The balance due on any outstanding purchase money security interest in the motor vehicle, and the name and address of the secured party;
 - f. Each person who paid any part of the purchase price or who has repaid or is repaying any part of a purchase money loan, and the amount and source of the funds paid;
 - g. The market value of the motor vehicle;
 - h. The identity of all documents relating to purchase of the motor vehicle, evidence of title or registration of ownership;
 - i. The nature and value of your interest in the motor vehicle.
20. Identify all items of tangible personal property having a value of \$100 or more which you own either individually or jointly with another person or entity including, but not limited to, jewelry, furs, furniture, office equipment, television sets, radios, record players, electrical appliances, power tools, photographic equipment, works of art, musical instruments, coin or stamp collections, silver or china; and for each item state the purchase price and date of purchase; the approximate value of each item; the seller of each item; by whom each item was purchased; the source of funds used to purchase each item; the nature and extent of your interest in each item; the name, address and telephone number of any joint owner; the location of each item; the amount due on any outstanding purchase money security interest, conditional sales agreement, lease/sale agreement, or other encumbrance; the name and address of the secured party, conditional seller or lessor; and all documents relating to the purchase and ownership of each item.
21. Do you own or have any interest in any corporate stocks, bonds, or other investment contracts, including any option to purchase or sell a security, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? If so, as to each such interest state:
- a. The identity of such stock, bond or security;

- b. The name in which such stock, bond or security is held;
 - c. The par or face value of such stock, bond or security;
 - d. The market value of such stock, bond or security;
 - e. The name, address and telephone of the custodian of such stock, bond or security;
 - f. By whom such stock, bond or security was purchased and the source of funds used to purchase such stock, bond or security;
 - g. The name, address and telephone number of any joint owner;
 - h. The date(s) on which interest is payable on any bonds;
 - i. The maturity date of any bond; and
 - j. The identity of any documents which relate to the purchase and ownership of such stock, bond or security including the actual stock, bond and securities certificates.
22. Identify any pension or 401(k) plan in which you have an interest; the nature of your interest; the dollar amount or value of your interest; and all documents relating thereto.
23. Do you own or maintain any savings or checking accounts, certificates of deposit, money market accounts, mutual fund accounts, or IRA or Keogh accounts, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? If so, as to each such account or certificate state:
- a. The identity of the institution in which you have the account;
 - b. The title and number or identifying reference of the account or certificate;
 - c. The identity of any joint owner of the account or certificate and the nature of your joint ownership;
 - d. The nature of the account or certificate; and
 - e. The purchase price of the certificate;
 - f. The dates and amounts of your deposits or contributions for the last 5 years;
 - g. The dates and amounts of your withdrawals for the last 5 years;
 - h. The current balance of the account or value of the certificate.

24. Do you have any safe deposit box or other similar storage facility in your name (either individually or jointly with another individual or entity), in the name of any entity in which you have any ownership or other involvement (either alone or jointly with another entity or individual) or in which you have contained personal property with a value in excess of \$100? If so, as to each such box or facility state:
- a. The identity of the institution in which you rent or maintain such safe deposit box or facility;
 - b. The number under which such safe deposit box or facility is rented;
 - c. The name under which such safe deposit box or facility is rented; and
 - d. The contents of such safe deposit box or facility.
25. Identify any seat owned by you either individually or jointly with another person or entity in any stock commodity or other exchange; the estimated value of the seat; by whom the seat was purchased and the source of the funds used to purchase the seat; the name in which the seat is held; the name of the joint owner; and all documents relating to the purchase and ownership of the seat, and membership rules of the exchange.
26. Do you have any interest in any patent, copyright, or royalties or in any patentable invention or copyrightable material? If so, identify:
- a. The patent, copyright, or royalties or the patentable invention or copyrightable material;
 - b. The nature of your interest;
 - c. The dollar amount or value of your interest;
 - d. The identity of any documents relating to your interest.
27. Have you any uncollected debts, accounts receivable, or other monies that are due you? If so, for each please state.
- a. The identity of the debtors;
 - b. The date the debt was created;
 - c. The amount of the remaining debt
 - d. The terms of repayment, including the date on which the debt is due;
 - e. The identity of any document which creates, evidences, or refers to the debt.

28. Are there any unsatisfied judgments of record in your favor in any action or have any judgments been assigned to you by anyone? If so, for each please state:

- a. The identity of the judgment debtor;
- b. The identity of the suit, action, or legal proceedings relating to the judgment, including the caption, the court in which it is filed, and the court term and number;
- c. The identity of the assignor, if any;
- d. The nature of the judgment;
- e. The status of the judgment and any execution proceedings.

29. Do you hold any security interest in or lien on personal property? If so, as to each such security interest or lien, state:

- a. The description of the personal property, including the identity of present owner;
- b. The nature and amount of the security interest or lien, including the identification of any court action involved;
- c. The date when you acquired the security interest or lien;
- d. The obligation secured by such security interest or lien;
- e. The identity of any documents which relate to the security interest or lien.

30. Have you any right, interest, financial advantage or prospect thereof under any contract, insurance or other claim, cause of action or pending lawsuit in the courts of this or any other state or in the federal courts? If so, for each please state:

- a. The identity of the contract, insurance claim, cause of action or pending lawsuit, and any documents relating thereto;
- b. The identity of the other party or parties involved;
- c. The nature and current status of the contract, claim, cause of action, or lawsuit;
- d. The known or estimated value of the same.

31. Are you the beneficiary of any trust? If so, identify the name, address and telephone number of the trustee, the duration of the trust and your interest therein, the amount of income you receive from the trust annually, the amount of principal to which you are entitled upon

distribution, the date of distribution, and the identity of all documents relating to the creation of the trust.

32. Have you received any money, or interest in real or personal property under any will or inheritance, or have you been notified of any interest in any decedent's estate? If so, identify the decedent, the executor or administrator, the nature and value of your bequest, devise, legacy or distributive share, and the date of distribution or expected distribution.
33. Do you have a will? If so, identify the property, real or personal, which is specifically devised, bequeathed or otherwise disposed of by your will, and the person named as executor.
34. Do you have any title insurance, casualty insurance, collision insurance, homeowners insurance or other insurance against loss or damage to property? If so, identify each policy, the issuer, and the property, real or personal, which is insured thereby.
35. Are you the beneficiary under an insurance policy on the life of any other person? If so, identify the policy, the issuer, the insured, the amount of the policy, the current value of the policy and any other beneficiaries.
36. Do you have any insurance on your own life? If so, identify the policy, the issuer, the amount of the policy, and the amount of premiums remaining to be paid.
37. Do you own or have an interest in any other assets not already disclosed? If so, please identify the same and the current location.
38. Identify each item of tangible personal property which you have in pawn; the name and address of the pawn broker; the value of the item; the amount of the pawn; and the terms of redemption.
39. Identify each item of tangible or intangible personal property owned by you either individually or jointly with another person or entity which is subject to any outstanding security interest; the name and address of the secured party; the security agreement; the balance due on the underlying obligation.
40. Have you sold, assigned, given or traded any tangible or intangible personal property or interest in personal property with a value of \$100 or more to anyone within the last 5 years? If so, as to each transfer, please state:
 - a. The description of the property;
 - b. The interest which you transferred;

- c. The identity of the person to whom you transferred the property or interest therein;
- d. The date of the transfer;
- e. The consideration you received for each transfer;
- f. The reason for such transfer;
- g. The fair market value of the interest at the time of your transfer.

41. What money have you received and what money have you spent since September 25, 2019?

42. Do you owe any federal, state or local taxes? If so, identify each taxing authority, the period for which taxes are due, and the amount of taxes due.

43. Are you owed any federal, state or local tax refund? If so, identify each taxing authority, the period for which taxes are due you and the exact or estimated amount of the refund.

44. Do you make, or are you under obligation or order to make, any child or spousal support payments? If so, please specify for each such payment obligation:

- a. The identity of the recipient;
- b. The identity of any court action relating such payments or obligations;
- c. The amount of such payments or obligation;
- d. The payment and delinquency history of such payments in the last two years.

45. Do you owe anyone money? If so, identify each creditor by name and address, the amount due, and the terms of repayment.

46. Are you a member of any clubs? If so, identify each club, the amount of club dues, and whether the dues have been paid and by whom.

47. Are there any pending suits, actions, legal proceedings or claims of any kind against you or any interest you hold? If so, as to each state the following:

- a. The identity of the suit, action or legal proceeding including the title, the court in which it was filed, and the court term and number;
- b. The identity of the other party or claimant;
- c. The nature of the suit, action, proceeding or claim;

- d. The known or estimated value of the same;
 - e. The current status of the suit, action, proceeding or claim.
48. Other than the judgment in this case, are there any judgments on record against you or any company or entity in which you have an interest? If so, for each judgment please state:
- a. The identity of the suit, action or legal proceedings relating to the judgment, including the title, the court in which it is filed, and the court term and number;
 - b. The amount and date of the judgment;
 - c. The identity of the individual or entity in whose favor the judgment exists;
 - d. Have payments been made on account thereof by you or by any third party, person or entity for you?
 - e. If the answer to item (d) is yes, please identify amounts paid and the party, person or entity who paid them.
 - f. Was the judgment satisfied and the satisfaction recorded?
 - g. If answer to (f) is no, state why.
49. Is any judgment creditor currently attempting to execute on any judgment or secure information to aid in execution of any judgment? If so, as to each creditor, please specify:
- a. The identity of the judgment creditor;
 - b. Amount of judgment;
 - c. Nature of the current activities by the judgment creditor.
50. List any other liabilities or obligations not already disclosed.

Respectfully submitted,

KOLMAN LAW, PC

/s/ Timothy M. Kolman
Timothy M. Kolman, PA51982
414 Hulmeville Avenue
Pennel, PA 19047
(215) 750-3134
Attorney for Plaintiff.

EXHIBIT

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| | | |
|---------------------|---|------------------------------|
| PHILIP GODLEWSKI, | : | IN THE COURT OF COMMON PLEAS |
| Plaintiff, | : | OF LACKAWANNA COUNTY, PA |
| | : | |
| v. | : | No: 2022-cv-2195 |
| | : | |
| CHRIS KELLY et al., | : | |
| Defendants. | : | JURY TRIAL DEMANDED |

**INTERROGATORIES PROPOUNDED BY PLAINTIFF AND DIRECTED TO
DEFENDANT THE SCRANTON TIMES, L.P. RELATING TO PUNITIVE DAMAGES**

You are required to answer these Interrogatories within 30 days after their service upon you:

DEFINITIONS

A. As used herein, the words "you" and "your" refer to defendants and defendants' agents, representatives, attorneys, and all other persons acting or purporting to act on behalf of defendant.

B. As used herein, the word "document" shall mean the original and any copy, regardless of origin or location, or any book, pamphlet, periodical, letter, memorandum, telegram, report, study, handwritten note, working paper, or any other written, recorded, punched, or taped matter, however produced, to which you have or have had access. C. As used herein, "corporation," "company" or "entity" shall mean any corporation, partnership, sole proprietorship, company, entity, or business operation.

C. As used herein, "communication" shall mean all conversations, whether oral or written, all telephone calls, telegrams, letters, memoranda, documents, discussions, or any other form of communication.

D. As used herein, "identify" or "identity" used in reference to an individual or person means to state his full name, present business and private addresses and telephone numbers, his present or last known occupation, his employer, and employer's address.

E. As used herein, "identify" or "identity" when used in reference to a corporation, company, entity, or institution means to state its full name and present address and telephone numbers, any fictitious names under which it operates, and the present owners, officers and directors thereof with their current addresses.

F. As used herein, "identify" or "identity" when used in reference to a document or communication means to state the date, author, type of document or communication (e.g., letter, memorandum, telegram, chart, etc.) or any other means of identifying it, its present location, and the name and address of its custodian. If any such document or communication was, but is no longer, in your possession or subject to your control, state what disposition was made of it and who presently has it.

G. If a precise value amount or date cannot be supplied in response to an Interrogatory, provide an approximate value, amount or date.

INTERROGATORIES

1. State The Scranton Times, L.P.'s full legal name, address telephone number and Tax Identification Number.
2. What fictitious or other trade names, whether registered or unregistered, does The Scranton Times, L.P. use in conducting its business, if any?
3. State the name(s), address(es) and telephone number(s) of each and every general partner and limited partner in The Scranton Times, L.P. Indicate the nature and percentage of each and every partnership interest. Provide a copy of the limited partnership agreement together with any and all amendments thereto.
4. Identify by name, address, and telephone number each and every agent authorized to accept process on behalf of The Scranton Times, L.P.
5. State the number of persons employed by The Scranton Times, L.P.
6. Describe each and every area of trade or commerce in which The Scranton Times, L.P. is engaged.
7. Indicate The Scranton Times, L.P.'s average gross annual earnings from all sources; and its average net annual earnings.
8. Is The Scranton Times, L.P. associated in a business or professional partnership or joint venture? If so, identify the partnership or joint venture and the members thereof; the nature of the business; the percentage of The Scranton Times, L.P.'s interest; the estimated value of The Scranton Times, L.P.'s interest; The Scranton Times, L.P.'s average gross and net annual compensation; provide copies of all documents relating to the formation and governance of the partnership or joint venture.
9. Is The Scranton Times, L.P. a principal of a closely held corporation? If so, identify the corporation; the stockholders, directors and officers, and their relationship to The Scranton Times, L.P., if any; the nature of the business; the number of shares and par value of the stock held by The Scranton Times, L.P. and each of The Scranton Times, L.P.'s fellow stockholders; any restrictions on the transfer of your stock; the market or repurchase value of The Scranton Times, L.P.'s interest in the corporation; all documents relating to The Scranton Times, L.P.'s purchase and ownership of stock in the corporation; all documents relating to incorporation of the corporation, bylaws and stockholders agreements.

10. State The Scranton Times, L.P.'s gross taxable income as shown by The Scranton Times, L.P.'s Federal Income Tax returns for the years 2015 through 2021. Provide copies of The Scranton Times, L.P.'s Federal Income Tax Returns for those years.
11. What is The Scranton Times, L.P.'s present average monthly income from all sources?
12. Does The Scranton Times, L.P. pay rent for your any real property in or on which The Scranton Times, L.P. conducts any aspect of its business operations? If so, state the name and address of The Scranton Times, L.P.'s landlord and the amount of rent The Scranton Times, L.P. pays per month.
13. Does The Scranton Times, L.P. own any interest in any other real estate in this state or elsewhere either individually or jointly with another individual or entity? If so, as to each such interest state:
 - a. The full address and location of the real estate;
 - b. The market value of the real estate;
 - c. The nature and extent of The Scranton Times, L.P.'s interest in the real estate, including joint, reversionary, remainder, leasehold, contingent or beneficial interest;
 - d. The name, address and telephone number of any joint owner;
 - e. The date The Scranton Times, L.P. acquired its interest;
 - f. The amount and source of the funds which The Scranton Times, L.P. paid to acquire such interest;
 - g. The identity of all documents which relate to your The Scranton Times, L.P. in the real estate and the source of funds used to purchase the interest (including statements, passbooks, check registers, etc.) Provide copies of each and every document;
 - h. If there are any mortgages on such real estate, state as to each mortgage:
 - i. The identities of the mortgagee, the mortgagor and the real owner;
 - j. The identity of all documents relating to the mortgage and the underlying obligation;
 - k. The amount of the original mortgage obligation;
 - l. The outstanding obligation of the mortgage;
 - m. The date on which the mortgage was executed;
 - n. The date on which and the office in which the mortgage was recorded; and

- a. The make, model, year, color, and serial number of the motor vehicle;
 - b. Whose name appears on the registration or title certificate;
 - c. The location and current custodian of the motor vehicle;
 - d. The purchase price of the motor vehicle;
 - e. The balance due on any outstanding purchase money security interest in the motor vehicle, and the name and address of the secured party;
 - f. Each person who paid any part of the purchase price or who has repaid or is repaying any part of a purchase money loan, and the amount and source of the funds paid;
 - g. The market value of the motor vehicle;
 - h. The identity of all documents relating to purchase of the motor vehicle, evidence of title or registration of ownership;
 - i. The nature and value of The Scranton Times, L.P.'s interest in the motor vehicle.
17. Identify all items of tangible personal property having a value of \$100 or more which The Scranton Times, L.P. own either individually or jointly with another person or entity including, but not limited to, jewelry, furs, furniture, office equipment, television sets, radios, record players, electrical appliances, power tools, photographic equipment, works of art, musical instruments, coin or stamp collections, silver or china, equipment and supplies of any description; and for each item state the purchase price and date of purchase; the approximate value of each item; the seller of each item; by whom each item was purchased; the source of funds used to purchase each item; the nature and extent of your interest in each item; the name, address and telephone number of any joint owner; the location of each item; the amount due on any outstanding purchase money security interest, conditional sales agreement, lease/sale agreement, or other encumbrance; the name and address of the secured party, conditional seller or lessor; and all documents relating to the purchase and ownership of each item.
18. Does The Scranton Times, L.P. own or have any interest in any corporate stocks, bonds, or other investment contracts, including any option to purchase or sell a security, either individually or jointly with another individual or entity or in the name of any entity in which The Scranton Times, L.P. has any ownership interest or other involvement? If so, as to each such interest state:
- a. The identity of such stock, bond or security;
 - b. The name in which such stock, bond or security is held;
 - c. The par or face value of such stock, bond or security;
 - d. The market value of such stock, bond or security;
 - e. The name, address and telephone of the custodian of such stock, bond or security;

- f. By whom such stock, bond or security was purchased and the source of funds used to purchase such stock, bond or security;
 - g. The name, address and telephone number of any joint owner;
 - h. The date(s) on which interest is payable on any bonds;
 - i. The maturity date of any bond; and
 - j. The identity of any documents which relate to the purchase and ownership of such stock, bond or security including the actual stock, bond and securities certificates.
19. Does The Scranton Times, L.P. own or maintain any savings or checking accounts, certificates of deposit, money market accounts or mutual fund accounts, either individually or jointly with another individual or entity or in the name of any entity in which The Scranton Times, L.P. has any ownership interest or other involvement? If so, as to each such account or certificate state:
- a. The identity of the institution in which The Scranton Times, L.P. has the account;
 - b. The title and number or identifying reference of the account or certificate;
 - c. The identity of any joint owner of the account or certificate and the nature of The Scranton Times, L.P.'s joint ownership;
 - d. The nature of the account or certificate; and
 - e. The purchase price of the certificate;
 - f. The dates and amounts of The Scranton Times, L.P. deposits or contributions for the last 5 years;
 - g. The dates and amounts of The Scranton Times, L.P. withdrawals for the last 5 years; and
 - h. The current balance of the account or value of the certificate.
20. Does The Scranton Times, L.P. have any safe deposit box or other similar storage facility in The Scranton Times, L.P.'s name (either individually or jointly with another individual or entity), in the name of any entity in which The Scranton Times, L.P. has any ownership or other involvement (either alone or jointly with another entity or individual) or in which The Scranton Times, L.P. has contained personal property with a value in excess of \$100? If so, as to each such box or facility state:
- a. The identity of the institution in which The Scranton Times, L.P. rents or maintains such safe deposit box or facility;
 - b. The number under which such safe deposit box or facility is rented;

- c. The name under which such safe deposit box or facility is rented; and
 - d. The contents of such safe deposit box or facility.
21. Identify any seat owned by The Scranton Times, L.P. either individually or jointly with another person or entity in any stock commodity or other exchange; the estimated value of the seat; by whom the seat was purchased and the source of the funds used to purchase the seat; the name in which the seat is held; the name of the joint owner; and all documents relating to the purchase and ownership of the seat, and membership rules of the exchange.
22. Does The Scranton Times, L.P. have any interest in any patent, copyright, or royalties or in any patentable invention or copyrightable material? If so, identify:
- a. The patent, copyright, or royalties or the patentable invention or copyrightable material;
 - b. The nature of The Scranton Times, L.P.'s interest;
 - c. The dollar amount or value of The Scranton Times, L.P.'s interest;
 - d. The identity of any documents relating to The Scranton Times, L.P.'s interest.
23. Has The Scranton Times, L.P. any uncollected debts, accounts receivable, or other monies that are due The Scranton Times, L.P.? If so, for each please state.
- a. The identity of the debtors;
 - b. The date the debt was created;
 - c. The amount of the remaining debt;
 - d. The terms of repayment, including the date on which the debt is due; and
 - e. The identity of any document which creates, evidences, or refers to the debt.
24. Are there any unsatisfied judgments of record in The Scranton Times, L.P.'s favor in any action or have any judgments been assigned to The Scranton Times, L.P. by anyone? If so, for each please state:
- a. The identity of the judgment debtor;
 - b. The identity of the suit, action, or legal proceedings relating to the judgment, including the caption, the court in which it is filed, and the court term and number;
 - c. The identity of the assignor, if any;
 - d. The nature of the judgment;
 - e. The status of the judgment and any execution proceedings.
25. Does The Scranton Times, L.P. hold any security interest in or lien on personal property? If so, as to each such security interest or lien, state:

- a. The description of the personal property, including the identity of present owner;
 - b. The nature and amount of the security interest or lien, including the identification of any court action involved;
 - c. The date when The Scranton Times, L.P. acquired the security interest or lien;
 - d. The obligation secured by such security interest or lien; and
 - e. The identity of any documents which relate to the security interest or lien. Provide copies of all such documents.
26. Has The Scranton Times, L.P. any right, interest, financial advantage or prospect thereof under any contract, insurance or other claim, cause of action or pending lawsuit in the courts of this or any other state or in the federal courts? If so, for each please state:
- a. The identity of the contract, insurance claim, cause of action or pending lawsuit, and any documents relating thereto;
 - b. The identity of the other party or parties involved;
 - c. The nature and current status of the contract, claim, cause of action, or lawsuit;
 - d. The known or estimated value of the same.
27. Is The Scranton Times, L.P. the beneficiary of any trust? If so, identify the name, address and telephone number of the trustee, the duration of the trust and The Scranton Times, L.P.'s interest therein, the amount of income The Scranton Times, L.P. receive from the trust annually, the amount of principal to which you are entitled upon distribution, the date of distribution, and the identity of all documents relating to the creation of the trust.
28. Has The Scranton Times, L.P. received any money, or interest in real or personal property under any will or inheritance, or has The Scranton Times, L.P. been notified of any interest in any decedent's estate? If so, identify the decedent, the executor or administrator, the nature and value of your bequest, devise, legacy or distributive share, and the date of distribution or expected distribution.
29. Are there any agreements which provide an option to purchase The Scranton Times, L.P.? If so, provide copies of any such agreements.
30. Does The Scranton Times, L.P. have any title insurance, casualty insurance, collision insurance, homeowners insurance or other insurance against loss or damage to property? If so, identify each policy, the issuer, and the property, real or personal, which is insured thereby.
31. Is The Scranton Times, L.P. the beneficiary under an insurance policy on the life of any other person? If so, identify the policy, the issuer, the insured, the amount of the policy, the current value of the policy and any other beneficiaries.

32. Does The Scranton Times, L.P. own or have an interest in any other assets not already disclosed? If so, please identify the same and the current location.
33. Identify each item of tangible or intangible personal property owned by The Scranton Times, L.P. either individually or jointly with another person or entity which is subject to any outstanding security interest; the name and address of the secured party; the security agreement; the balance due on the underlying obligation.
34. Has The Scranton Times, L.P. sold, assigned, given or traded any tangible or intangible personal property or interest in personal property with a value of \$100 or more to anyone within the last 5 years? If so, as to each transfer, please state:
- a. The description of the property;
 - b. The interest which The Scranton Times, L.P. transferred;
 - c. The identity of the person to whom The Scranton Times, L.P. transferred the property or interest therein;
 - d. The date of the transfer;
 - e. The consideration The Scranton Times, L.P. received for each transfer;
 - f. The reason for such transfer; and
 - g. The fair market value of the interest at the time of your transfer.
35. Do The Scranton Times, L.P. owe any federal, state or local taxes? If so, identify each taxing authority, the period for which taxes are due, and the amount of taxes due.
36. Is The Scranton Times, L.P. owed any federal, state or local tax refund? If so, identify each taxing authority, the period for which taxes are due you and the exact or estimated amount of the refund.
37. Does The Scranton Times, L.P. owe anyone money? If so, identify each creditor by name and address, the amount due, and the terms of repayment.
38. Are there any pending suits, actions, legal proceedings or claims of any kind against The Scranton Times, L.P. or any interest The Scranton Times, L.P. holds? If so, as to each state the following:
- a. The identity of the suit, action or legal proceeding including the title, the court in which it was filed, and the court term and number;
 - b. The identity of the other party or claimant;
 - c. The nature of the suit, action, proceeding or claim;
 - d. The known or estimated value of the same; and
 - e. The current status of the suit, action, proceeding or claim.

39. Other than the judgment in this case, are there any judgments on record against The Scranton Times, L.P. or any company or entity in which The Scranton Times, L.P. has an interest? If so, for each judgment please state:
- a. The identity of the suit, action or legal proceedings relating to the judgment, including the title, the court in which it is filed, and the court term and number;
 - b. The amount and date of the judgment;
 - c. The identity of the individual or entity in whose favor the judgment exists;
 - d. Have payments been made on account thereof by The Scranton Times, L.P. or by any third party, person or entity for The Scranton Times, L.P.?
 - e. If the answer to item (d) is yes, please identify amounts paid and the party, person or entity who paid them.
 - f. Was the judgment satisfied and the satisfaction recorded?; and
 - g. If answer to (f) is no, state why.
40. Is any judgment creditor currently attempting to execute on any judgment or secure information to aid in execution of any judgment? If so, as to each creditor, please specify:
- a. The identity of the judgment creditor;
 - b. Amount of judgment; and
 - c. Nature of the current activities by the judgment creditor.
41. List any other liabilities or obligations not already disclosed.

Respectfully submitted,

KOLMAN LAW, PC

/s/ Timothy M. Kolman

Timothy M. Kolman, PA51982
414 Hulmeville Avenue
Pennel, PA 19047
(215) 750-3134
Attorney for Plaintiff.

COMMONWEALTH OF PENNSYLVANIA:

: SS

COUNTY OF

:

I, _____, swear under oath that I am a defendant in the above-titled action and that I have answered the interrogatories set forth above truly and completely.

Dated: _____

Sworn to and subscribed

before me, a Notary Public,

this ___ day of _____

2023.

Notary Public:

SEAL: