

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, THE SCRANTON
TIMES, L.P., LARRY HOLEVA
Defendants.

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

CIVIL DIVISION

JURY TRIAL DEMANDED

No.: 2021-CV-2195

MAURIP R. KELLY
LACKAWANNA COUNTY
2021 FEB 27 PM 3:27
CLERK OF SUPERIOR
RECORDS CIVIL DIVISION

DEFENDANTS' PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Defendants, Chris Kelly, The Scranton Times, L.P. and Larry Holeva ("Defendants"), by and through their attorneys, Haggerty Hinton & Cosgrove LLP, submit the following Proposed Findings of Fact and Conclusions of Law:

Proposed Findings of Fact

1. On February 14, 2021, The Scranton Times, L.P., published an article stating Plaintiff pled guilty to corruption of a minor charge in 2011 and admitted to having a sexual relationship with a 15-year old girl. (See Complaint filed May 24, 2021 and Exhibit "A" thereto which is the article at issue.)
2. Phil Godlewski's defamation lawsuit claims he never had sex with a 15-year old girl. (See Complaint.)
3. The 15 year-old girl or victim that Phil Godlewski pled guilty to corrupting her morals is Brienna DuBorgel. (See Exhibit "A" from Defendants' Exhibit List for February 6, 2023 Hearing (unredacted copy of Criminal Complaint was provided to the Court.)
4. On June 8, 2021, defense counsel served Attorney Kolman with a letter requesting Plaintiff to preserve any evidence "about the lawsuit, the Defendants, the article. . . any criminal charges ever filed against Philip Godlewski and all electronically stored information, including any relevant information on a smartphone or mobile phone. (See

Exhibit E from Defendants' Exhibit List for February 6, 2023 Hearing.)

5. On July 9, 2021, Defendants served Plaintiff with Interrogatories (Set I) that stated on the first page of the Interrogatories: "[T]hese Interrogatories are continuing in nature and require you [Plaintiff] to file supplementary answers pursuant to Rule 4007.4." (See Exhibit G from Defendants' Exhibit List for February 6, 2023 Hearing.)
6. On July 12, 2021, Defendants served Plaintiff with Requests for Production of Documents (Set I) which stated in the Instructions:

In the event that any document requested to be identified by any Interrogatory has been destroyed or lost, such document shall be identified by stating... reason for the loss, destruction or transfer...(See Exhibit I from Defendants' Exhibit List for February 6, 2023 Hearing, pp. 3-4.)

7. Defendants' Request for Production of Documents (Set I) propounded upon Plaintiff defines the term "Document" and Documents" as:

any and all tangible things and documents, whether handwritten, typed, printed, e-mailed, taped, filmed, photostatted, copied or reproduced in any way, including but not limited to:

- (i) ***external communications or interoffice communications, letters, telefaxes, telexes, e-mails, cables, telegrams, wires and memoranda; ...***
- (v) ***photographs, films, videotapes, computer generated documents, recordings, e-mail, cassettes, recordings, microfiche. and other reproductions; ...***

"Document(s)" shall also include any draft or version of a document and all copies which are not identical to the original; all modifications or additions to any document, whether or not such copies or drafts are specifically mentioned in particular requests; and any material recorded on verbal, graphic, computer, electronic, telecommunicative, or magnetic form, and any other form capable of being read, heard or otherwise understood. (See Exhibit I from Defendants' Exhibit List for February 6, 2023 Hearing.)

8. On September 20, 2021, Plaintiff served a response to Defendants' Interrogatories (Set I)

which stated:

33. Do you have any letters, e-mails or text messages to or from the 15-year-old girl?

ANSWER: None. (See Exhibit H from Defendants' Exhibit List for February 6, 2023 Hearing.)

9. On September 20, 2021, Plaintiff served a response to Defendants' Request for Production of Documents (Set I) which asked Plaintiff to produce:

19. Any documents [defined to include telecommunicative] sent to or from the 15-year-old girl referred to in the article attached to your Complaint.

ANSWER: None. (See Exhibit J from Defendants' Exhibit List for February 6, 2023 Hearing.)

10. The article attached to the Complaint referred to the victim from Phil Godlewski's 2010-2011 criminal case as the "15 years old girl" so Defendants used that reference in their initial discovery. (See Exhibit "A" attached to Complaint.)

11. Defendants served Plaintiff with Request for Production of Documents (Set IV) on June 24, 2022. (See Exhibit K from Defendants' Exhibit List for February 6, 2023 Hearing.)

12. On August 22, 2022, Plaintiff served a response to Defendants' Request for Production of Documents (Set IV) which stated:

7. Produce any text message between Phil Godlewski and Brienna DuBorgel between 1/1/2008 through the present date.

Answer: Plaintiff does not have any. (See Exhibit L from Defendants' Exhibit List for February 6, 2023 Hearing.)

13. On November 7, 2022, twobytwo Solutions, LLC provided defense counsel with 1533

text messages between Phil Godlewski and Brienna DuBorgel that were downloaded from Brienna DuBorgel's phones on 11/3/22.

14. On November 9, 2022, Plaintiff served a response to Defendants' Interrogatories (Set III) (See Exhibit N from Defendants' Exhibit List for February 6, 2023 Hearing) which stated:

6. Has Plaintiff communicated with Brienna DuBorgel about his Lawsuit or his damages from the Article?

ANSWER: Yes.

If Plaintiff answers "yes", please state the dates of such communications, the form of such communications (live in person, phone, text or email) and the substance of each communication (such participant stated) on each specific date of the communication.

ANSWER: Plaintiff does not recall the specific date of communication. Plaintiff spoke with Brienna DuBorgel in person regarding the filing and warned that it was eminent. Plaintiff asked if Brienna DuBorgel would rather Plaintiff forego filing, so as to avoid any stress into her life. Brienna DuBorgel said to file so that they could both set the record straight.

15. On November 18, 2022, Plaintiff served a response to Defendants' Interrogatories (Set IV) (See Exhibit Z from Defendants' Exhibit List for February 6, 2023 Hearing) which stated:

7. Did you have sex or a sexual relationship with Brienna DuBorgel at any time?

ANSWER: No.

If "yes" when did you have sex or a sexual relationship with her and how long did

the sexual relationship last?

ANSWER: N/A.

16. Plaintiff's testimony at the hearing clearly shows his sworn interrogatory answer was false. He testified they began a sexual relationship in 2013, 2014 or 2015. (Transcript, p. 84.)
17. On November 22, 2022, Defense counsel provided Plaintiff's counsel with all the text messages she had with Plaintiff obtained by twobytwo Solutions, LLC from Brienna's phones.
18. On November 23, 2022, Defense counsel served Request for Admissions (Set I) upon Plaintiff and made a request for Plaintiff to produce Plaintiff's cell phone for forensic examination to obtain his communications with Brienna DuBorgel.
19. On December 8, 2022, Plaintiff served a Response to Defendants' Request for Admission (Set I) and admitted that the text messages obtained by twobytwo Solutions, LLC from Brienna DuBorgel's phone were his communications with Brienna DuBorgel. (See Exhibit FF from Defendants' Exhibit List for February 6, 2023 Hearing) as follows:

1. Do you admit that the documents attached hereto as Exhibit "A" (ST 1021 to ST 1508) are copies of electronic message communications you had with B.D.?

ANSWER: Yes.

20. This answer to requests for admissions demonstrates the falsity of Plaintiff's sworn interrogatory answer in paragraph 14 above. He disclosed only one in-person communication with Brienna in that answer. This demonstrates the deceptive character of Plaintiff's answer.

21. On December 8, 2022, Plaintiff's counsel refused to produce Plaintiff's cell phone for forensic examination and stated they will file a motion for a protective order regarding a cell phone examination. No such motion has been filed. (See Exhibit JJ from Defendants' Exhibit List for February 6, 2023 Hearing.)
22. Brienna DuBorgel had a sexual relationship with Philip Godlewski when she was in 9th grade and he was 24 or 25 years of age. (Transcript of Proceedings on February 6, 2023 "Transcript", p. 19, testimony of Brienna DuBorgel.)
23. Philip Godlewski took Brienna DuBorgel to homes he had access to as a realtor to have sex with him when she was a freshman at Riverside High School. (Transcript, p. 34.)
24. Philip Godlewski gave Brienna DuBorgel earrings around Christmas time in year 2008, her freshman year. (Transcript, p. 19.)
25. About two months before the February 6, 2023 hearing Brienna DuBorgel spoke to Philip Godlewski by phone and he offered to pay her fifty thousand dollars (\$50,000) if she would be "on his side" in this lawsuit. (Transcript, pp. 32-33.)
26. More specifically, Philip Godlewski wanted Brienna DuBorgel to say she was eighteen (18) when they were involved in a sexual relationship. (Transcript, pp. 33-34.)
27. Brienna DuBorgel told Philip Godlewski she can't lie under oath. (Transcript, p. 34.)
28. Philip Godlewski admitted at the hearing he was having a sexual relationship with Brienna DuBorgel in "2013, 2014, 2015, somewhere in that" time period. (Transcript, p. 84.)
29. Philip Godlewski also admits he corrupted Brienna DuBorgel's morals in 2009 and 2010. (Transcript, p. 85.)
30. Philip Godlewski testified he was not requested in discovery to produce his text messages

he had with Brienna DuBorgel which is contrary to the discovery requests described in paragraphs 8, 9, and 11-12. (Transcript, p. 91.)

31. Regarding Defendants' Request for Production of Documents on June 24, 2022, Philip Godlewski testified he did not possess any text messages with Brienna DuBorgel from 2008 to present date. (Transcript, p. 91.)
32. Despite Defendants serving an interrogatory on November 4, 2022 (Exhibit M from Defendants' Exhibit List for February 6, 2023 Hearing) asking Plaintiff to describe any communications he had with Brienna DuBorgel about his lawsuit against The Scranton Times, Philip Godlewski failed to disclose his text messages with Brienna DuBorgel that discussed the lawsuit. (Transcript, pp. 92-93; See Exhibit SS from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora (Stack of text messages, and specifically ST 1480, 1481-1483, 1492-1494.)
33. Phil Godlewski testified "[Y]ou [Attorney Hinton] didn't ask me" for the text messages with Brienna DuBorgel. (Transcript, p. 93.)
34. Moments later defense counsel showed Phil Godlewski the Request for Production of Documents (Set IV), No. 7 (Exhibit K from Defendants' Exhibit List for February 6, 2023 Hearing) which was served on June 24, 2022. (Transcript, p. 93.)
35. That request dated June 24, 2022 and his answer (Exhibit L from Defendants' Exhibit List for February 6, 2023 Hearing) served on 8/22/22 reads:
 7. Produce any text messages between Phil Godlewski and Brienna DuBorgel [actual copy used her full name, not initials] between 1/1/2008 through the present date.

Answer: Plaintiff does not have any.
36. Phil Godlewski then testified he didn't have text messages [almost 500 pages of them

- were produced by Brienna DuBorgel] because he deleted them. (Transcript, p. 94.)
37. Plaintiff answered an interrogatory (Exhibit NN from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora) on December 9, 2022, No. 2, claiming he has not deleted any text messages he had with Brienna DuBorgel.
 38. A minute later in the hearing Phil Godlewski testified: "I didn't delete any of them [text messages]." (Transcript, p. 96.)
 39. Plaintiff testified he didn't produce the text messages because he took screenshots of his text messages with Brienna and saved them onto his laptop. (Transcript, pp. 96-97.)
 40. In Phil Godlewski's mind they were no longer on his phone so they were not electronic communications with Brienna DuBorgel. (Transcript, pp. 96-97.)
 41. His explanation is not credible and defies logic.
 42. Phil Godlewski testified: "I have several screenshots like this [Exhibit BB from Defendants' Exhibit List for February 6, 2023 Hearing]" on his laptop. (Transcript, p. 97.) It can be inferred he still has them. None have been produced in discovery.
 43. Phil Godlewski said "I would be happy to give you any communications I had with Brie recently. I have nothing to hide there. In fact, you have them all anyway." (Transcript, p. 97.)
 44. Phil Godlewski admitted under questioning from the Court that his screenshots of his text messages with Brienna are copies of digital communications with Brienna DuBorgel. (Transcript, p. 98.)
 45. Phil Godlewski admitted he had 31 pages of text messages with Brienna in between the date Defendants' Request for Production of Documents (Set I (Exhibit I from Defendants' Exhibit List for February 6, 2023 Hearing) was served on July 12, 2021 and

- the date of his response on September 20, 2021. (Exhibit J from Defendants' Exhibit List for February 6, 2023 Hearing.)
46. If Phil Godlewski deleted text messages in the short time period right after the discovery request was served and the time he responded, such conduct should be determined to be egregious.
 47. Phil Godlewski's discovery response on September 20, 2021 (Exhibit J from Defendants' Exhibit List for February 6, 2023 Hearing) claimed he had no telecommunicative documents with the victim from his 2010 criminal case.
 48. On June 24, 2022, Defendants served Request for Production of Documents (Set IV) (Exhibit K from Defendants' Exhibit List for February 6, 2023 Hearing) which requested in No. 7 any text messages from Phil Godlewski and Brienna DuBorgel from 2008 to present.
 49. On August 22, 2022, Plaintiff answered No. 7 that he doesn't have any. (Exhibit L from Defendants' Exhibit List for February 6, 2023 Hearing; Transcript, p. 105.)
 50. Four days before Plaintiff's response on August 22, 2022, he had eleven (11) pages of text messages with Brienna DuBorgel. (Transcript, pp. 105-107, Exhibit SS from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora, ST 1483-1494.)
 51. Again, the overlap in time of the text messages between Plaintiff and Brienna DuBorgel and Plaintiff's false discovery responses shows a bad faith state of mind.
 52. Phil Godlewski received the Defendants' preservation of evidence letter dated June 8, 2021 (Exhibit E from Defendants' Exhibit List for February 6, 2023 Hearing) but he claims he just didn't think anything he spoke with Brienna DuBorgel about was any sort of evidence in the case. (Transcript, pp. 107-108.)

53. Phil Godlewski claims he did not think Brienna DuBorgel was a principal witness or had anything to do with the trial. (Transcript, pp. 109-110.)
54. On August 6, 2022 Phil Godlewski posts to his Telegram page “What is everyone going to say when the victim testified during my Scranton Times lawsuit?” (See the August 6, 2022 post attached hereto as **Exhibit 2**.) The falsity of Plaintiff’s testimony is apparent.
55. Phil Godlewski admits that the text with black background shown in Exhibit BB (See Defendants’ Exhibit List for February 6, 2023 Hearing) (The Court has an enlarged version) is his text and it came from his laptop. (Transcript, p. 114.) He posted this text on his Telegram channel on November 27, 2022.
56. Phil Godlewski testified he never spoke to Brienna DuBorgel about the lawsuit in text message format. (Transcript, p. 116.)
57. Phil Godlewski claims he only spoke to Brienna DuBorgel about the lawsuit in person or over the phone. (Transcript, p. 116.)
58. This testimony is patently false. (See Exhibit SS from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora (Stack of text messages, and specifically ST 1480, 1481-1483, and 1492-1494.)
59. Phil Godlewski claims he was offering her a business opportunity on May 28, 2022 (Transcript, p. 126.) that “would help her for the rest of her life, which was important to me considering all we’ve been through.” (Transcript, p. 120.)
60. Phil Godlewski testified that when he was writing to Brienna DuBorgel by text about a financial opportunity and windfall to take down “those motherfuckers once and for all” and “shove our middle fingers up their fucking assholes” he was referring to the federal government, the IRS and the Federal Reserve, not The Scranton Times. (See Transcript,

pp. 117-126.)

61. Defendants requests the Court make a finding of fact that Phil Godlewski is lying about the meaning and intent of these text messages (See Exhibit SS from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora, ST 1455-1483) and thus the reason he failed to produce them.
62. Phil Godlewski could not keep his stories straight in the same hearing. At one point he testified “I did not think she [Brie] was a principal witness at all” in this case (Transcript, p. 109) and an hour later he testified “I knew they were going to bring her [Brie] into this” case. (Transcript, p. 157.)
63. Plaintiff has not produced even one page of documents from his computer or laptop evidencing a communication he had with Brienna DeBorgel, even as of this late date.
64. Phil Godlewski testified: “I had no idea a conversation that I had with Brie has anything – any sort of evidentiary value to that case. (Transcript, p. 108.)
65. Plaintiff knows Defendants are out to prove he had sex with Brienna DuBorgel when she was 15 years old and that’s why he pled guilty to corrupting her morals in 2011.
66. The text messages in Exhibit SS (from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora), pages ST 161-1063, 1083, 1089, 1093, 1109, 1136, 1137 and 1138 are highly relevant to Defendants’ planned defense of proving a past sexual relationship.
67. Plaintiff’s strategy has moved from a complete denial of a sexual relationship to now admitting such a relationship but claiming Brienna was at least 20 years old.

Proposed Conclusions of Law

68. “Spoliation of evidence” is the non-preservation or significant alteration of evidence for

pending or future litigation. When a party to a suit has been charged with spoliating evidence in that suit, the trial court has to exercise its discretion to impose a range of sanctions against the spoliator. PTSI, Inc. v. Haley, 71 A.3d 304, 315 (Pa.Super. 2013) (quoting Pyeritz v. Commonwealth, 32 A.3d 687, 692 (Pa. 2011) (internal citations and footnotes omitted)).

69. 42 Pa. C.S.A. §2503(7) permits a party to request reasonable counsel fees against another party for “dilatatory, obdurate or vexatious conduct during the pendency of a matter.”
70. Pa. R.C.P. 4019 permits the Court, upon motion, to make an appropriate order for sanctions if a party fails to serve answers to interrogatories or fails to produce documents requested under Rule 4009 or fails to “obey an order of court respecting discovery.”
71. The trial court must weigh three factors to determine the appropriate sanction for spoliation:

(1) the degree of fault of the party who altered or destroyed the evidence; (2) the degree of prejudice suffered by the opposing party; and (3) whether there is a lesser sanction that will avoid substantial unfairness to the opposing party and, where the offending party is seriously at fault, will the sanction serve to deter such conduct by others in the future.

Id. (quoting Creazzo v. Medtronic, Inc., 903 A.2d 24, 29 (Pa.Super. 2006)).

72. In assessing the “degree of fault of the party who altered or destroyed the evidence,” the trial court must consider (1) “the extent of the offending party’s duty or responsibility to preserve the relevant evidence, and (2) the presence or absence of bad faith.” Id. (quoting Creazzo, 903 A.2d at 29).
73. Here, Plaintiff’s conduct was intentional and egregious.
74. Plaintiff intentionally failed to preserve and/or produce material evidence requested in discovery by Defendants, specifically his text messages with Brienna DuBorgel, are

harmful to his case and thus his reason for not producing them.

75. Plaintiff is seriously at fault and exhibited bad faith by failing to preserve and/or produce this evidence, specifically his text messages with Brienna DuBorgel (approximately 1386 messages), in response to discovery by Defendants.
76. Plaintiff had a responsibility to preserve the evidence in light of the June 8, 2021 Preservation of Evidence letter and Defendants' numerous discovery requests.
77. Defendants have suffered prejudice, including significant counsel fees, and legal costs (twobytwo Solutions, LLC bills), due to Plaintiff's intentional concealment and failure to produce the requested text messages.
78. Defendants had to expend legal fees to obtain the text messages from Brienna DuBorgel, approximately \$3,000 in legal fees and incur costs with twobytwo Solutions, LLC to obtain the text messages and prove Plaintiff still had text messages on his computer (\$10,587.50) (See Exhibit QQ from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora. The invoices from twobytwo Solutions, LLC are attached hereto as **Exhibit 1.**)
79. Defendants contend they have met their heavy burden to secure a dismissal of the case and full award of counsel fees and costs as shown on Exhibit QQ (from Exhibits for February 6, 2023 Hearing Binder provided to Judge Minora) due to Plaintiff's intentional, egregious and prejudicial conduct.
80. However, if the Court determines that a dismissal and a sanction of all defense costs is too severe, especially since Brienna DuBorgel came forward to avert Phil Godlewski's subterfuge, Defendants request that the Court make a judicial ruling that "Plaintiff intentionally concealed and failed to produce his text messages with Brienna DuBorgel

(ST 1021-1508) to Defendants because the evidence is harmful to his claims.”

81. Plaintiff should also be ordered to pay Defendant, The Scranton Times, L.P., the sum of \$13,587.50 to compensate it for legal fees and the twobytwo Solutions, LLC invoices within thirty (30) days or suffer additional sanctions as ordered by the Court.
82. The general rule in Pennsylvania is the “[i]f a party fails to call a witness or other evidence within his or her control, the fact finder may be permitted to draw an adverse inference.” Leonard Packel and Anne Poulin, *Pennsylvania Evidence* 419 at 248, note 1 (West’s Pennsylvania Practice 1987, pocket part 1997, 1998 New Rules Supplement). However, the witness (or evidence) must not be equally available to both parties, or the inference may not be drawn. *Bennet v. Sokel*, 555 Pa. 560, 725 A.2d 745 (1972). This rule applies in both civil and criminal cases, as to both witnesses and other evidence, and when applied to witnesses it is often known as the “missing witness rule.” *Pennsylvania evidence*, supra. (See *Schroeder v. Department of Transportation*, 551 Pa. 243, 210 A.2d 23 (1998) where the Pa. Supreme Court in ruling on a spoliation of evidence matter concluded that a lesser sanction than summary judgment, such as a spoliation instruction to the jury may be drawn from Plaintiff’s failure to preserve the evidence was appropriate. See also *Oxford Presbyterian Church v. Weil-McLain Co., Inc.*, 815 A.2d 1094 (Pa Super. 2003).)
83. Defendants request that a sanction be imposed on Plaintiff in the form of Court Order declaring that an “adverse inference may be drawn due to Plaintiff’s failure to preserve and produce his text messages with Brienna DuBorgel since the publication of The Scranton Times article on February 14, 2021.”
84. The adverse inference doctrine is applicable here. The evidence (Plaintiff’s text

messages) were within Plaintiff's control and not equally available to Defendants. But for Brienna DuBorgel's courage to step forward as a witness, Defendants would have never seen them.

85. There should be some punishment for Plaintiff's nefarious conduct.

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

Date: 2-27-2023

By: 

Timothy Hinton, Jr., Esq.

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Dunmore, PA 18509

(570) 344-9845

timhinton@haggertylaw.net

Attorneys for Defendants,

Chris Kelly, Times Shamrock

Communications, The Scranton Times-

Tribune 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

MAURIE B. KELLY
SACRAMENTO COUNTY
JUL 10 10 37 P 3 15
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, THE SCRANTON
TIMES, L.P., LARRY HOLEVA
Defendants.

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

CIVIL DIVISION

JURY TRIAL DEMANDED

No.: 2021-CV-2195

CERTIFICATE OF SERVICE

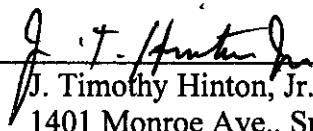
I hereby certify that on this ¹²21 day of February 2023, I caused to be served by electronic mail, a true and correct copy of the foregoing Defendants' Proposed Findings of Facts and Conclusions of Law upon the following:

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

CHRIS KELLY
LACKAWANNA COUNTY
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION
FEB 27 3:15

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

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Communications, The Scranton Times-
Tribune and Larry Holeva*

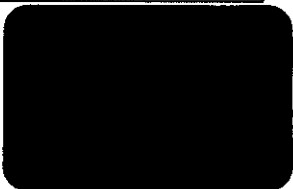
twobytwo solutions, LLC
646 Park St, Suite 2020
Honesdale, PA 18431

Invoice

Date	Invoice #
11/10/2022	1088

Bill To
Haggerty Hinton & Cosgrove LLP Attn: Tim Hinton 1401 Monroe Ave, Suite 2 Dunmore, PA 18509

Description	Amount
[re: Godlewski v Scranton Times] Forensic Imaging Mobile (2x iPhone) Expert Services: Prepare redacted output per witness agreement submitted via email: timhinton@haggertylaw.net	1,600.00 437.50
Total	USD 2,037.50



twobytwo solutions, LLC
646 Park St, Suite 2020
Honesdale, PA 18431

Invoice

Date	Invoice #
1/24/2023	1102

Bill To
Haggerty Hinton & Cosgrove LLP Attn: Tim Hinton 1401 Monroe Ave, Suite 2 Dunmore, PA 18509

Description	Amount
[re: Godlewski v. Kelly et al] Forensic Preservation, Social (Telegram channel, XXL) Expert Services: Godlewski Telegram Report	850.00 6,300.00
Total USD 7,150.00	

68837 twobytwo solutions LLC
TIMES

Check No. - 694175
Check Date - 1/26/2023
Stub 1 of 1

to. Inv. Date Remarks
1/24/2023

Gross Amt. Discount Net Amt.
7,150.00 7,150.00

7,150.00

7,150.00

THE SCRANTON TIMES
149 PENN AVENUE
SCRANTON, PA 18503

60-295/313



00694175

DATE

AMOUNT

168837 1/26/2023 \$*****7,150.00

IN THOUSAND ONE HUNDRED FIFTY AND 00/100*****

twobytwo solutions LLC
646 Park St Ste 2020
Honesdale PA 18431



[Signature]
AUTHORIZED SIGNATURE

Security Features Included

⑈694175⑈ ⑆031302955⑆ 9852637165⑈

twobytwo solutions, LLC
646 Park St, Suite 2020
Honesdale, PA 18431

Invoice

Date	Invoice #
2/7/2023	1104

Bill To
Haggerty Hinton & Cosgrove LLP Attn: Tim Hinton 1401 Monroe Ave, Suite 2 Dunmore, PA 18509

Description	Amount
[re: Godlewski v. Scranton Times] Expert Services: Sworn Testimony, <50 mi, 4hr	1,400.00
Total	USD 1,400.00

Payee: 168837 twobytwo solutions LLC
THE SCRANTON TIMES

Check No. - 694504
Check Date - 2/14/2023
Stub 1 of 1

Invoice No. Inv. Date Remarks
1104 2/7/2023

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PH 7375

297

VOID TO LEFT TO PREVENT REPRODUCTION OF THIS CHECK. VOID TO RIGHT TO PREVENT REPRODUCTION OF THIS CHECK.

THE SCRANTON TIMES
149 PENN AVENUE
SCRANTON, PA 18503

60-295/313



00694504

DATE AMOUNT
168837 2/14/2023 \$*****1,400.00

ONE THOUSAND FOUR HUNDRED AND 00/100*****

PAY
TO THE
ORDER
OF

twobytwo solutions LLC
646 Park St Ste 2020
Honesdale PA 18431



[Signature]
AUTHORIZED SIGNATURE

⑈ 694504 ⑈ ⑆ 031302955 ⑆

9852637165⑈

Phil Godlewski 2.0 **FAKE**
340K subscribers

August 6, 2022

Phil Godlewski 2.0
What is everyone going to say when the victim testifies during my Scranton Times lawsuit?

What is she going to say?

I have a feeling the truth is going to be revealed. 83.2K 12:13

August 8, 2022

Phil Godlewski 2.0
Okay all. The time has come for me to call an end to this.

From this moment on, there will be NO mention of any "in-fighting" or "defamation" between myself, and any other Truther/journalist/reporter.

Phil Godlewski 2.0 **FAKE**
@phil_godlewski1

340K 3.6K 913 29 2.55K
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