

PHILIP GODLEWSKI,  
Plaintiff

v.

CHRIS KELLY, et al.  
Defendants.

MAURIE B KELLY  
LACKAWANNA COUNTY

2023 JUN 28 P 3:48

CLERK OF SUPERIOR COURT  
RECORDS CIVIL DIVISION

IN THE COURT OF COMMON PLEAS  
OF LACKAWANNA COUNTY

CIVIL DIVISION

JURY TRIAL DEMANDED

No.: 2021-CV-2195

.....  
**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER**  
.....

Defendants Chris Kelly (hereinafter ("Kelly"), The Scranton Times, L.P. (hereinafter "Scranton Times"), and Larry Holeva (hereinafter "Holeva") (collectively "Defendants"), by and through their counsel, J. Timothy Hinton, Jr. and Haggerty Hinton & Cosgrove LLP, hereby file this Response to Plaintiff's Motion for Protective Order.

1. Admitted.
2. After reasonable investigation, Defendants are without knowledge or sufficient information to admit or deny the averments and thereof they are denied and strict proof thereof is demanded at the hearing on the motion.
3. After reasonable investigation, Defendants are without knowledge or sufficient information to admit or deny the averments and thereof they are denied and strict proof thereof is demanded at the hearing on the motion.
4. After reasonable investigation, Defendants are without knowledge or sufficient information to admit or deny the averments and thereof they are denied and strict proof thereof is demanded at the hearing on the motion.
5. Admitted.
6. Denied. Defendants' counsel contends that Plaintiff's mother, Marie Godlewski, possesses information reasonably calculated to lead to the discovery of admissible

- evidence at trial.
7. Admitted.
  8. Denied. Defendants' counsel contends that Plaintiff's mother, Marie Godlewski, possesses information reasonably calculated to lead to the discovery of admissible evidence at trial.
  9. Denied. Defendants' counsel contends that Plaintiff's mother, Marie Godlewski, possesses information reasonably calculated to lead to the discovery of admissible evidence at trial.
  10. Denied. Defendants' counsel contends that Plaintiff's mother, Marie Godlewski, possesses information reasonably calculated to lead to the discovery of admissible evidence at trial.
  11. Admitted.
  12. Denied. Defendants' counsel contends that Plaintiff's mother, Marie Godlewski, possesses information reasonably calculated to lead to the discovery of admissible evidence at trial.
  13. Denied. Pa. R.C.P. 4013 speaks for itself.
  14. Denied.

WHEREFORE, Defendants respectfully request that the Court deny Plaintiff's Motion for a Protective Order. Further, Defendants request that the Court compel the deposition of Marie Godlewski to appear for a deposition as presently noticed for July 20, 2023 and if she fails to appear for the deposition be subject to sanctions upon further motion by Defendants.

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

Date: 6-28-2023

By: J. T. Hinton, Jr.

J. Timothy Hinton, Jr., Esq.  
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Attorneys for Defendants,

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

**CERTIFICATE OF COMPLIANCE**

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

/s/ J. Timothy Hinton, Jr., Esq.  
**J. TIMOTHY HINTON, JR., ESQUIRE**  
**PA I.D. 61981**

MAURICE KELLY  
2022 JUN 28 10 34 AM  
JUDICIAL  
CLERK OF SUPERIOR COURT  
JUNIOR CIVIL DIVISION

PHILIP GODLEWSKI,  
Plaintiff

v.

CHRIS KELLY, et al.  
Defendants.

IN THE COURT OF COMMON PLEAS  
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MAURI B. KELLY  
CLERK OF JUDICIAL  
RECORDS CIVIL DIVISION

2023 JUN 28 JURY TRIAL DEMANDED  
3:48

CLERK OF JUDICIAL  
RECORDS CIVIL DIVISION  
No. 2021-CV-2195

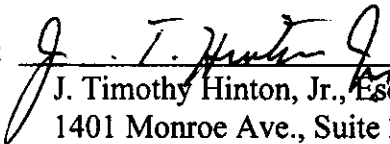
**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of June 2023, I caused to be served by electronic mail, a true and correct copy of the foregoing Response to Plaintiff's Motion for Protective Order upon all parties:

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

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

By:   
\_\_\_\_\_  
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*Chris Kelly, The Scranton Times, L.P.,  
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