

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al.
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY
:
: CIVIL DIVISION
:
: JURY TRIAL DEMANDED
: No.: 2021-CV-2195

**DEFENDANTS' MOTION TO COMPEL PLAINTIFF'S DISCOVERY RESPONSES
AND DECLARE REQUESTS FOR ADMISSIONS TO BE ADMITTED**

AND NOW COMES the Defendants, Chris Kelly, The Scranton Times, L.P. and Larry Holeva, by and through their attorneys, Haggerty Hinton & Cosgrove LLP, and present this Motion to Compel Plaintiff's Discovery Responses and Declare Requests for Admissions to be Admitted and in support thereof avers:

PROCEDURAL HISTORY

1. Plaintiff commenced this action by filing a Complaint on May 24, 2021.
2. Defendants filed an Answer and New Matter on July 6, 2021.
3. Plaintiff is seeking \$5 million in damages from Defendants in this case.

(Complaint, ¶1.)

**I. DEFENDANTS' REQUESTS FOR PRODUCTION OF DOCUMENTS
(SET VIII)**

4. On May 15, 2023, Defendants served Plaintiff with Request for Production of Documents (Set VIII). (Attached as Exhibit "A" is a true and correct copy of Defendants' Request for Production of Documents (Set VIII).)

5. Plaintiff has not responded to these requests.
6. Plaintiff's counsel has not requested any extension to respond beyond the thirty

(30) day deadline.

**SCANNED
BK**

MAURINE KELLY
LACKAWANNA COUNTY
2023 JUN 20 A 11:34
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

7. On June 19, 2023, Defendants served Plaintiff's counsel with a letter requesting past due responses within ten (10) days. (Attached as Exhibit "B" is a true and correct copy of the letter sent to Plaintiff's counsel dated June 19, 2023.)

8. Plaintiff's counsel never even responded to this letter.

9. Pursuant to Pa. R.C.P. 4009.12(a), a party served with requests for the production of documents shall answer the requests and produce or make the responsive documents available within thirty (30) days after being served. Pa. R.C.P. 4009.12(a).

10. Pa. R.C.P. 4019(a)(1) authorizes the Court to make an appropriate order if, among other things, a party fails to serve answers to discovery requests, including written requests for production under Rule 4009.

11. Accordingly, Defendants' respectfully request an Order of this Court pursuant to Pa. R.C.P. 4019(a)(1) compelling Plaintiff to respond to Defendants' Request for Production of Documents (VIII) in full, without objection, within ten (10) days of the Order being filed.

II. DEFENDANTS' INTERROGATORIES (SET VIII)

12. On May 15, 2023, Defendants served Plaintiff with Interrogatories (Set VIII). (Attached as Exhibit "C" is a true and correct copy of Interrogatories (Set VIII).)

13. Plaintiff has not responded to these interrogatories.

14. Plaintiff's counsel has not requested any extension to respond beyond the thirty (30) day deadline.

15. On June 19, 2023, Defendants served Plaintiff's counsel with a letter requesting past due responses within ten (10) days. (Attached as Exhibit "B" is a true and correct copy of the letter sent to Plaintiff's counsel dated June 19, 2023.)

16. Plaintiff's counsel never even responded to this letter.

17. Pursuant to Pa. R.C.P. 4006, a party served an interrogatory shall answer the interrogatory within thirty (30) days after being served. Pa. R.C.P. 4006.

18. Pa. R.C.P. 4006 authorizes the Court to make an appropriate order if, among other things, a party fails to serve answers to discovery requests.

19. Accordingly, Plaintiff respectfully requests an Order of this Court compelling Plaintiff to answer Defendants' Interrogatories (Set VIII) in full, without objection, within ten (10) days of the Order being filed.

III. DEFENDANTS' REQUESTS FOR ADMISSIONS (SET V and SET VI)

20. On April 28, 2023, Defendants served Plaintiff Requests for Admissions (Set V). (Attached as Exhibit "D" is a true and correct copy of Defendants' Request for Admissions (Set V).)

21. Plaintiff has not responded to these requests for admissions.

22. Plaintiff's counsel has not requested any extension to respond to these requests.

23. On May 15, 2023, Defendants served Plaintiff Requests for Admissions (Set VI). (Attached as Exhibit "E" is a true and correct copy of Defendants' Request for Admissions (Set VI).)

24. Plaintiff has not responded to these requests for admissions.

25. Plaintiff's counsel has not requested any extension to respond to these requests.

26. On June 19, 2023, Defendants served Plaintiff's counsel with a letter stating that Requests for Admissions (Set V) and Requests for Admissions (Set VI) are deemed admitted pursuant to Pa. R.C.P. 4014(b) since no responses were timely served. (Attached as Exhibit "B" is a true and correct copy of the letter sent to Plaintiff's counsel dated June 19, 2023.)

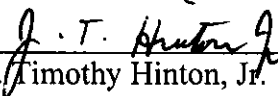
27. Plaintiff's counsel never even responded to this letter.

28. Pursuant to Pa. R.C.P. 4014(b) Defendants request that the Court declare that all requests in Defendants' Requests for Admissions (Set V) and Defendants' Requests for Admissions (Set VI) be deemed admitted by Plaintiff.

WHEREFORE, Defendants, Chris Kelly, The Scranton Times, L.P. and Larry Holeva, respectfully request that this Honorable Court enter an Order compelling discovery against Plaintiff in the form of the proposed Order submitted herewith, declaring the unanswered requests for admissions to be deemed admitted by Plaintiff and grant all such further relief, as the Court finds to be just and proper.

Respectfully submitted,

Date: June 30, 2023



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
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. 6198

MAURI B. KELLY
CLERK OF JUDICIAL
RECORDS DIVISION
2023 JUN 30 4 11:34
LAOKAHEWANA COUNTY

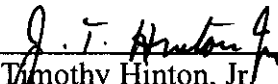
CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June 2023 I caused to be served by electronic mail, a true and correct copy of the foregoing Defendants' Motion to Compel Plaintiff's Discovery Responses upon the following:

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

Respectfully submitted:

Date: 6-30-2023



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
*Chris Kelly, Times Shamrock
Communications, The Scranton Times-
Tribune and Larry Holeva*

MAURIE B. KELLY
LACKAWANNA COUNTY
2023 JUN 30 A 11:34
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

**HAGGERTY
HINTON &
COSGROVE LLP**
ATTORNEYS AT LAW

Telephone 570-344-9845 • Fax 570-343-9731 • 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 • hhc@haggertylaw.net

Joseph O. Haggerty, Jr.
J. Timothy Hinton, Jr.*
Michael F. Cosgrove
Matthew E. Haggerty - Of Counsel

May 15, 2023

VIA EMAIL ONLY
tkolman@kolmanlaw.com

Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Pennel, PA 19047

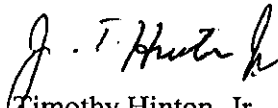
Re: Philip Godlewski vs. Chris Kelly,
et al.
No. 2021-CV-2195

Dear Attorney Kolman:

Enclosed are a Defendants' Request for Production of Documents (Set VIII) propounded upon Plaintiff.

Thank you.

Very truly yours,


J. Timothy Hinton, Jr.

JTH:jls
Encls.

*Certified Civil Trial Advocate By National Board Of Trial Advocacy,
A Pennsylvania Supreme Court Accredited Agency



hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Monday, May 15, 2023 1:53 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'; J. Timothy Hinton, Jr.
Subject: Godlewski vs. Kelly, et al. - Defs RFPs (Set VIII) File 1 of 2
Attachments: Defs RFPs Set VIII.pdf; ST 2790-2905.pdf; ST 515-521.pdf


Dear Attorney Kolman: (Email 1 of 2)

Please see the attached letter form Attorney Hinton with Defendants' Request for Production of Documents (Set VIII). There will be a second email with additional documents previously produced (ST 3193-3499) for your easy reference with these requests.

Thank you

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731


This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Monday, May 15, 2023 1:54 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'; J. Timothy Hinton, Jr.
Subject: Godlewski vs. Kelly, et al. - Defs RFPs (Set VIII) File 2 of 2
Attachments: ST 3193-3499.pdf

Email 2 of 2 (Defs RFPs (Set VIII))

Thank you.

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731

This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY
:
: CIVIL DIVISION
:
: JURY TRIAL DEMANDED
:
: No.: 2021-CV-2195

.....
DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS (SET VIII)
PROPOUNDED UPON PLAINTIFF

TO: Philip Godlewski

Defendants, Chris Kelly, Times Shamrock Communications, The Scranton Times-Tribune and Larry Holeva (hereinafter referred to as "Defendants"), by and through their counsel, Haggerty Hinton & Cosgrove LLP, by their undersigned counsel, hereby propounds the following request for production of documents and tangible things pursuant to Rule 4009.1 et seq. of the Pennsylvania Rules of Civil Procedure.

The documents and tangible things requested herein must be produced at the law offices of Haggerty Hinton & Cosgrove LLP, within thirty days.

Each of the following requests is intended as a separate request. Where a request has subparts, please respond to each subpart separately and in full. Do not limit any response to the numbered requests as a whole.

If you have any objection to any request, please state your objection fully and set forth the factual basis for your objection in lieu of production of documents. You must file and serve a written response to these requests upon you, regardless of the time set for production of the documents and things requested herein. You are reminded that any objections not raised within the thirty-day time period provided for by Pa.R.C.P. 4009.12 will be deemed to have been waived by you.

These requests are not only for documents and tangible things that are owned by you, but also for documents and tangible things that are in your possession, custody, or control. This means that you must produce all documents and tangible things that are responsive to a particular request and that are in your possession (regardless of whether they are your property), or over which you have control even if they are not in your possession. It also means you must produce documents and tangible things that are in the possession, custody, or control of your agents, employees, and/or attorneys.

Before responding to these requests, you are required to make a diligent search of your files and records to ascertain whether you have documents that would be responsive to a given request. Your agents, employees, and attorneys must do the same.

DEFINITIONS

1. "Defendants" mean Defendants, Chris Kelly, Times Shamrock Communications, The Scranton Times-Tribune and Larry Holeva, its agents and representatives, including, without limitation, its attorneys, and all other persons acting or purporting to act on its behalf.

2. "Plaintiff" means Philip Godlewski.

3. "You" means the Plaintiff.

4. "Complaint" refers to the Complaint filed by Plaintiff in Pennsylvania, Action No: 2021-CV-2195 in the Court of Common Pleas of Lackawanna County.

5. As used herein the terms "document" and "documents" mean any and all tangible things and documents, whether handwritten, typed, printed, e-mailed, electronic, digital, taped, filmed, photostatted, copied or reproduced in any way, including but not limited to:

- (i) electronically stored information—including writings, drawings, graphs, charts, photographs, text messages, instant messages, direct messages, screen shots, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form;
- (ii) external communications or interoffice communications, letters, telefaxes, telexes, e-mails, cables, telegrams, wires and memoranda;
- (ii) reports, summaries, drafts, studies, minutes, notes, agendas and transcripts;
- (iii) screen shots, drawings and charts;
- (iv) tape recordings and other reproductions of sound or voices;
- (v) photographs, films, videotapes, computer generated documents, recordings, e-mail, cassettes, recordings, microfiche, and other reproductions;
- (vi) contracts, agreements and other official documents and legal instruments;
- (vii) published material of any kind;
- (viii) travel reports and vouchers;
- (ix) ledgers, bills, orders, books, records, invoices, checks, receipts, confirmations, estimates, claims and files;
- (x) notebooks, calendars, appointment books, diaries, scrapbooks, schedules and handwritten or other notes;
- (xi) working papers, sketches, drawings, pictures, plans, instructions, charts, papers, graphs, indices, catalogs, tabulations, data sheets or data processing cards; and
- (xii) books, bills, pamphlets, periodicals and published material of any kind.

"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.

6. The term "concerning" means relating to, referring to, describing, evidencing or constituting.

7. The term "authentic" means of undisputed origin; genuine.

8. The singular shall include the plural and the plural shall include the singular.

9. The words "and" and "or" shall be construed conjunctively to mean "and/or" and the word "any" shall be construed to mean "any and all" where the effect of such construction is to broaden the scope of the document request in question.

10. In no instance shall the term "including" be construed to limit the scope of any document request.

11. The term "person(s)" includes all-natural persons, entities, individuals, partnerships, joint ventures, unincorporated associations, corporations, firms, associations (whether formerly organized or ad hoc), state, local and federal governments and subdivisions, and instrumentalities and agencies thereof.

12. "Statement" refers to a written statement or otherwise adopted or approved by the person making it, or a stenographic, mechanical, electrical or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it a contemporaneously recorded.

13. "Communication(s)" refers to every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more PERSONS, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, transcribed voice-mail messages, text messages, meetings, discussions, releases, statements, reports, publications, or any recordings or reproductions thereof.

INSTRUCTIONS

1. In responding to these document requests, furnish all documents available to plaintiff, including those in the possession of any of the plaintiffs' agents and attorneys and not merely such documents as plaintiff may have within their immediate control. For each document produced, indicate each numbered document request or part thereof which calls for its production. If plaintiff is unable to respond in full to any particular document request after exercising due diligence to obtain all the documents requested, so state; furnish the documents that are available; and indicate in writing Plaintiff's inability to provide the

rest of the documents that are responsive to the request, setting forth whatever information, knowledge or belief plaintiff have concerning the unavailable documents.

2. With respect to each document withheld from production based on a privilege, immunity or other protections:

(i) describe each such document, setting forth (a) its type (e.g., letter or memorandum); (b) general subject matter; (c) date; (d) page length (if a text document); (e) author(s); (f) addressees); (g) any other recipient(s); and (h) the numbers of the requests to which the document would be responsive if produced; and

(ii) set forth the basis for the claim of privilege or other immunity and the basis upon which Plaintiff refuses to produce it.

3. In the event that any document covered by this request has been lost, destroyed, or transferred to a third party over whom Plaintiff claims to lack control, identify:

- a. the document by author, date, recipient, context and subject matter;
- b. the date and circumstances surrounding the loss, destruction, or transfer;
- c. the reason(s) for the loss, destruction, or transfer;
- d. the person responsible for the loss or destruction;
- e. the person(s) or entit(ies) to whom transferred;
- f. the document's present location; and
- g. the date and manner in which defendants can or may obtain each such document.

4. These document requests are continuing, and defendants shall produce in the form of supplementary document productions any document requested herein which is unavailable to plaintiff the time of its response hereto but which becomes available to it or to its agents or representatives up to the time of trial.

DOCUMENTS REQUESTED

1. During the Telegram Voice Chat with SQvQge DQwg on November 26, 2021, you stated: "I still have the texts, in fact. I have every one of them from my trial" and "[E]very single text message, I still have them." **Produce copies of all the text messages you referred to in the above statement which you made during this voice chat on November 26, 2021.**

2. Provide any and all documents or evidence which support your contention that Brienna DuBorgel is lying about having a sexual relationship with you when she was a minor.

3. Produce copies of all your monthly phone bills for phone number 570-780-4567 from November 1, 2008 through June 30, 2010. (If you only have some of these phone bills, produce the ones you have.)

4. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the purported text messages (ST 2790-2905) are not authentic.

5. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 0515-0521 are not authentic.

6. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3193-3247 are not authentic.

7. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3248-3290 are not authentic.

8. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3291-3332 are not authentic.

9. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3333-3375 are not authentic.

10. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3376-3418 are not authentic.

11. Produce any and all documents or evidence in your possession (or your attorney's possession) which tend to prove the phone records marked as ST 3419-3499 are not authentic.

12. Produce any and all documents (including screen shots) showing the number of paid subscribers you had each month on Locals (Locals.com) from the time you joined the Locals platform until the present date.

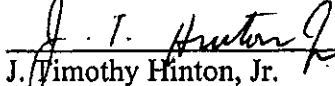
13. Produce any and all documents regarding any payments you made to Regent University or receipts for payments you made to Regent University.

14. Produce any and all documents regarding any payments you made to Harvard University or receipts for payments you made to Harvard University.

15. Produce any and all letters or emails sent to you, your counsel or the Court (Judge Barrasse) in Case No. 20-CR-664 (Marriotti Building Products case) in the Court of Common Pleas of Lackawanna County regarding your character or for purposes of deciding your sentencing.

Date: 5-17-2023

Respectfully submitted:



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, The Scranton Times, L.P. and
Larry Holeva

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY
:
: CIVIL DIVISION
:
: JURY TRIAL DEMANDED
:
: No.: 2021-CV-2195

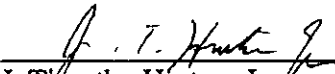
.....
CERTIFICATE OF SERVICE

I, J. Timothy Hinton, Jr., Esquire, certify that on this 15th day of May 2023, I caused a true and correct copy of the foregoing Defendants' Request for Production of Documents (Set VIII) propounded upon Plaintiff to be served upon the following parties via electronic mail:

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

Respectfully submitted:

Date: 5.15-2023



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, Times Shamrock
Communications, The Scranton Times-
Tribune and Larry Holeva

**HAGGERTY
HINTON &
COSGROVE LLP**
ATTORNEYS AT LAW

Telephone 570-344-9845 • Fax 570-343-9731 • 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 • hhc@haggertylaw.net

Joseph O. Haggerty, Jr.
J. Timothy Hinton, Jr.*
Michael F. Cosgrove
Matthew E. Haggerty - Of Counsel

June 19, 2023

VIA E-MAIL Tkolman@kolmanlaw.com
Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Penn del, PA 19047

Re: Philip Godlewski vs. Chris Kelly,
et al.
No. 2021-CV-2195

Dear Attorney Kolman:

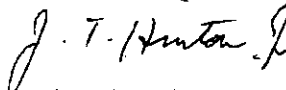
I served Defendants' Requests for Admission to Plaintiff (Set V) on April 28 2023. Plaintiff's response was due on May 28, 2023. These Requests for Admissions are now deemed admitted pursuant to Pa.R.C.P. 4014(b).

I also served Defendants' Requests for Admission to Plaintiff (Set VI) on May 15, 2023. Plaintiff's response was due on June 14, 2023. These Requests for Admissions are now deemed admitted pursuant to Pa.R.C.P. 4014(b).

Defendants served you with Requests for Production of Documents (Set VIII) and Interrogatories (Set VIII) on May 15, 2023. Plaintiff's responses to these discovery requests are overdue. Please send me your responses in the next ten (10) days or I will file a motion to compel.

Thank you.

Very truly yours,


J. Timothy Hinton, Jr.

JTH:jls
Encl.

cc: Timothy Bowers (Tbowers@KolmanLaw.com)



hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Monday, June 19, 2023 11:20 AM
To: Timothy M. Kolman, Esq.
Cc: Timothy Bowers, Esq.; Kathleen A. Carrozza; Sarra Small; J. Timothy Hinton, Jr.
Subject: Godlewski v. Kelly, et al. 2021-CV-2195
Attachments: Kolman-8.pdf

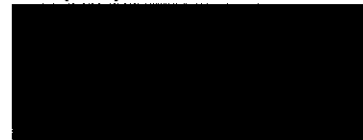
Dear Attorney Kolman:

Please see the attached letter from Attorney Hinton regarding Discovery.

Thank you.

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731



This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

**HAGGERTY
HINTON &
COSGROVE LLP**
ATTORNEYS AT LAW

Telephone 570-344-9845 • Fax 570-343-9731 • 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 • hhc@haggertylaw.net

Joseph O. Haggerty, Jr.
J. Timothy Hinton, Jr.*
Michael F. Cosgrove
Matthew E. Haggerty - Of Counsel

May 15, 2023

VIA EMAIL ONLY
tkolman@kolmanlaw.com

Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Penndel, PA 19047

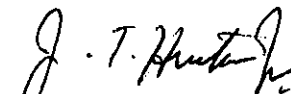
Re: Philip Godlewski vs. Chris Kelly,
et al.
No. 2021-CV-2195

Dear Attorney Kolman:

Enclosed are a Defendants' Interrogatories (Set VIII) directed to Plaintiff.

Thank you.

Very truly yours,


Timothy Hinton, Jr.

JTH:jls
Encls.

*Certified Civil Trial Advocate By National Board Of Trial Advocacy,
A Pennsylvania Supreme Court Accredited Agency



From: hhc@haggertylaw.net
Sent: Monday, May 15, 2023 2:36 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'; J. Timothy Hinton, Jr.
Subject: Godlewski vs. Kelly, et al. (Defs' Interrogatories (Set VIII)- [Email 1 of 2]
Attachments: Interrogatories (Set VIII) attachment 1.pdf; Interrogatories Set VIII.pdf; Defendants' Interrogatories (Set VIII) to Plaintiff.doc

Dear Attorney Kolman: (Email 1 of 2)

Please see the attached letter form Attorney Hinton with Defendants' Interrogatories (Set VIII) directed to Plaintiff. There will be a second email with the second half of bates numbered documents previously produced referred to in these Interrogatories for your easy reference. I am also including a WORD version for your ease of answering.

Thank you

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731

[REDACTED]

This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Monday, May 15, 2023 2:37 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'; J. Timothy Hinton, Jr.
Subject: Godlewski vs. Kelly, et al. (Defs' Interrogatories (Set VIII)- [Email 2 of 2]
Attachments: Interrogatories (Set VIII) attachment 2.pdf

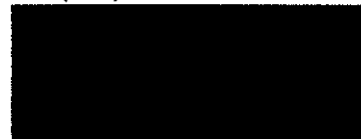
Dear Attorney Kolman:

Attached is Email 2 of 2 with regard to Defendants' Interrogatories (Set VIII) directed to Plaintiff.

Thank you.

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731



This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY
:
: CIVIL DIVISION
:
: JURY TRIAL DEMANDED
:
: No.: 2021-CV-2195

.....
DEFENDANTS' INTERROGATORIES (SET VIII)
DIRECTED TO PLAINTIFF

Pursuant to Rules 4006 of the Pennsylvania Rules of Civil Procedure, you are requested to answer the following Interrogatories. You are requested to answer the Interrogatories separately and under oath, within thirty (30) days after service hereof. In answering these Interrogatories, you are required to furnish all information that is available to you, that which can be learned through reasonable inquiry.

The Answers shall be inserted in the spaces provided following the Interrogatories. If there is insufficient space to answer the Interrogatory, the remainder of the answer shall follow on a supplemental sheet.

If any of these Interrogatories cannot be answered in full, please answer to the extent possible and specify the reason for your inability to answer the remainder.

These Interrogatories are continuing in nature and require you to file supplementary answers pursuant to Rule 4007.4 of your inability to answer the remainder.

INSTRUCTIONS

A. Each Interrogatory shall be answered separately and under oath. No Interrogatory should be left blank. If the answer to any Interrogatory is no, none, or unknown, such response should be written.

B. In answering these Interrogatories, you shall furnish all information available to you at the time of answering and shall supplement your answers without demand as soon as any additional information is known.

C. If a privilege or the work product doctrine is asserted with respect to a document or communication, state the following: (a) the nature of the privilege or reason for the withholding which you contend applies; (b) the factual basis for your assertion of privilege or the reason for withholding; (c) the type of document (*e.g.* letter, memorandum, telex, etc.); (d) all persons to whom the document was distributed, shown or explained; (e) all authors and addresses; (f) all indicated and blind copies; (g) the document's date; (h) a summary description of the document's subject matter; (i) the number of pages and attachments or appendices comprising the document; and (j) its present custodian.

D. In the event that any document requested to be identified by any Interrogatory has been destroyed or discarded, such document shall be identified by stating all of the information requested in subparts (c) through (i) of instruction "C", and in addition: (k) its date of destruction or discard, the manner of destruction or discard and the reason for destruction or discard; (l) the persons who authorized and carried out such destruction or discard; and (m) whether any copies of the documents presently exist, and if so, the name of the custodian of each copy.

DEFINITIONS

As used herein, the following terms when used in an Interrogatory shall have the following meanings:

- A. "Person" shall mean any individual, firm, partnership, association, corporation, organization, proprietorship or other entity.
- B. "Document" or "documents" shall mean any written, recorded or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, films, phones, computer storing devices or any other media and includes, without limiting the generality of the foregoing: photographs, negatives, correspondence, phone messages, images, telegrams, other written communications, contracts, receipts, agreements, notes, memoranda, internal memoranda, recordings, computer printouts or media including information stored on hard or floppy disks, electronic mail messages, tapes, cassettes, analyses, projections, work papers, orders, invoices, delivery receipts, x-rays, medical records, packing slips, diaries, calendars, desk calendars, minutes, affidavits, books, objects, cables, telex messages, telephone messages, transcripts, summaries, opinions, proposals, blueprints, plans, maps, surveys, reports, studies, evaluations, journals, appointment books, lists, tabulations or any other writings, including nonidentical copies and drafts of any of the foregoing now in your possession, custody or control. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections or markings peculiar to such copy of draft.
- C. "Identify" or "identification" when used herein with reference to a document means to state the date, author and addressee, if any, the type of writing (*e.g.* letter, memorandum, telegram, chart, etc.), any other means of identifying the writing, its present location, and the name, address and job classification of the person having custody or control thereof. If any such writing was, but is no longer in the possession, custody or control of the responding party, state what disposition has been made of it, the date thereof, the identification of the person responsible for making the decision as to such disposition, the identity of the person responsible for carrying out such disposition, the reasons for the disposition, the content of the document, and the location of any copies of the document.

In each instance, you may attach a copy of the writing to the answers to these Interrogatories in lieu of so identifying the writing.

- D. "Identify" or "identification" when used herein with reference to an individual means to state his/her full name and present or last known business and home addresses, if known, his/her employer and position at the time referred to in the Interrogatory, his/her present or last known business affiliation, and his or her phone number and email address.
- E. "Identify" or "identification" when used in reference to a business firm or entity means to state its full name, the type of entity (*e.g.* corporation, partnership, etc.), and principal place of business.
- F. "Identify" or "identification" when used in reference to a meeting or oral communication means to state the date, time, and location of the meeting or communication, the means of communication (*e.g.* telephone, luncheon meeting, etc.), the identity of each person at the meeting or a party to the communication, the identity of the person who initiated the meeting or communication, and the substance of the matters discussed at the meeting or during the communication.
- G. "Communication" shall mean the transfer of any information from one person to another by any means, including but not limited to, a document as defined herein or orally.
- H. A communication or document "relating to" or "referring to" or that "relates to" or "refers to" any given subject means any communication or document that, in whole or in part, constitutes, contains, embodies, reflects, contradicts, evidences, identifies, states, discusses, analyzes, refers to, describes, deals with or is any way pertinent to that subject.
- I. "You" and "your" shall mean or refer to Plaintiff or Philip Godlewski.
- J. "Plaintiff" means Philip ("Phil") Godlewski his agents and representatives, including, without limitation, his attorneys, and all other persons acting or purporting to act on his behalf.

INTERROGATORIES

1. Did you have any actual or real text message communications with Brienna DuBorgel during the time period from February 24, 2010 through March 12, 2010?

ANSWER:

2. Did you have any actual or real communications with Brienna DuBorgel in person or by phone during the time period from February 24, 2010 through March 12, 2010?

If "yes", state the dates of such communications and the content of each communication.

ANSWER:

3. Do any of the purported "incoming" text messages shown on ST 2790-2905 show the actual content of text message communications you actually sent to Brienna DuBorgel?

If "yes", please identify those communications you admit you did make by reference to the number in the far left-hand margin of ST 2790-2905.

ANSWER:

4. Do any of the purported "outgoing" text messages shown on ST 2790-2905 in February or March 2010 show the actual content of text message communications you received from Brienna DuBorgel?

If "yes", please identify those communications you received by reference to the number in the far left-hand margin of ST 2790-2905.

ANSWER:

5. Did you become engaged to Dori Gallagher in 2007?

ANSWER:

6. At the time you became engaged to Dori Gallagher were you pursuing an associate's degree in radiology at Johnson College?

ANSWER:

7. At the time you became engaged to Dori Gallagher were you employed at Osmolia's Shell Service Station?

ANSWER:

8. Did you reside with Dori Gallagher at all times from June 1, 2008 through June 30, 2010?

If there were any time periods you were not living with Dori Gallagher from June 1, 2008 to June 30, 2010, please set forth the dates of these time periods and state the addresses where you were living.

ANSWER:

9. Did John and Nancy Godlewski convey real estate at 430 Cayuga Street in Scranton to you and Dori Gallaher in June 2009 for \$57,500?

ANSWER:

10. Was Dori Gallagher employed at the Hampton Inn in Scranton from 2008 to 2010?

ANSWER:

11. What were the make and model of your vehicles (and Dori Gallagher's vehicles) you claim were seized and searched by detectives in 2010?

ANSWER:

12. Did you purchase or lease an Infiniti vehicle for Dori Gallagher in 2009 or 2010?

ANSWER:

13. Did you host an open house as a realtor at 110 Springbrook Road in Moosic on February 28, 2010? (See attachments marked as ST 3542-3546)

ANSWER:

14. Did you host any open houses on February 28, 2010 other than at 1100 Springbrook Road?

ANSWER:

15. Identify your uncles you worked with at Osmolia's Shell Service Station in 2010.

ANSWER:

16. What were the names and addresses of your living uncles in 2010?

ANSWER:

17. Identify any information or evidence you have indicating the purported text messages shown on ST 2790-2905 (see attached) were fabricated.

ANSWER:

18. Identify any information or evidence you have indicating the purported text messages shown on ST 2790-2905 (see attached) are not authentic.

ANSWER:

19. What information or evidence do you have that the purported text messages shown on ST 2790-2905 (see attached) were altered to appear to be communications between you and Brienna DuBorgel?

ANSWER:

20. Were you provided with the documents marked as ST 2790-2905 (see attached) in discovery while you were defending the 2010 criminal charges?

ANSWER:

21. What was the approximate date and year you were provided with the documents marked as ST 2790-2905?

ANSWER:

22. What evidence did you or your attorneys present to the DA's office indicating the text messages (ST 2790-2905) were not authentic?

ANSWER:

23. Were you provided with the documents marked as ST 2784-2785 (see attached) in discovery while you were defending the 2010 criminal charges?

ANSWER:

24. What was the approximate month and year you were provided the documents marked as ST 2784-2785?

ANSWER:

25. Identify any information or evidence you have indicating the documents marked as ST 2784-2785 (see attached) were not authored by you.

ANSWER:

26. Did you or your attorney provide the DA's office any evidence indicating that ST 2784-2785 was not authored by you?

If "yes" what evidence did you provide?

ANSWER:

27. Identify any persons who performed a fingerprint analysis of the original document marked as ST 2784-2785.

ANSWER:

28. Do you have any reports for a fingerprint analysis performed on the original document marked as ST 2784-2785?

ANSWER:

29. Did you ever give an interview (a question and answer session) with a Taylor Police Officer or an employee of the DA's office about your relationship with Brienna DuBorgel at anytime prior to July 11, 2011?

If "yes", please state the date of the interview and the interviewer's name?

ANSWER:

30. On November 26, 2021, you stated to SQvQge DQwg during a Telegram voice chat:

"My, my fiancé is getting a little upset. She thinks that things are going on and this is all in text message guys. This isn't like, I still have the texts, in fact. I have every one of them from my trial, but anyway, so I tell her this and I tell her, my fiancé is upset and now this really has to end. This has to be, you know, the final conversation." **In the above statement, were you referring to your actual or real text message communications that you had with Brienna DuBorgel?** *[Note: Plaintiff admitted to a*

true and accurate transcript of his verbal statements made during the November 26, 2021 voice chat with SQvQge DQwg in Plaintiff's Response to Defendants' Request for Admissions (Set II), No. 5.]

ANSWER:

31. Did your fiancée at the time, Dori Gallagher, get upset with you about your contacts with Brienna DuBorgel (as stated in No. 29 above) before you resigned as the JV baseball coach at Riverside High School?

ANSWER:

32. During the November 26, 2021 voice chat with SQvQge DQwg you stated you still had your actual text messages with Brienna DuBorgel. **Did you delete any of these text messages you stated you had from your 2010 case?** *[Note: Plaintiff admitted to a true and accurate transcript of his verbal statements made during the November 26, 2021 voice chat with SQvQge DQwg in Plaintiff's Response to Defendants' Request for Admissions (Set II), No. 5.]*

If "yes", when did you delete or destroy these text messages, and why did you delete or destroy them?

ANSWER:

33. Why have you not produced the text messages you referred to on the November 26, 2021 voice chat with SQvQge DQwg in discovery during this case?

ANSWER:

34. Where were these text messages (as referenced in No. 31 above) located on November 26, 2021? (On a computer or in a folder, for example.)

ANSWER:

35. Did you provide copies of the text messages referred to during the November 26, 2021 voice chat with SQvQge DQwg to anyone?

If "yes", identify all people or companies you provided the text messages to and state the dates you provided them with the text messages.

ANSWER:

36. On what date and occasion did you and/or your lawyer present evidence to the DA's office that the purported text messages (ST 2790-2905) were doctored or fabricated?

ANSWER:

37. What evidence did you or your attorneys present to the DA's office proving the purported text messages were doctored or fabricated?

ANSWER:

38. Did you have any actual or real text messages with Brienna DuBorgel after you resigned as the JV baseball coach and prior to the time of your arrest on July 9, 2010?

If "yes", state the dates of such text message communications.

ANSWER:

39. During what months and years did you have actual or real text message communications with Brienna DuBorgel prior to your arrest on July 9, 2010?

ANSWER:

40. When did you last see the actual or real text messages with Brienna DuBorgel that you referred to on November 26, 2021 in the Telegram voice chat with SQvQge DQwg?

ANSWER:

41. State the facts as to how you corrupted Brienna DuBorgel's morals prior to July 9, 2010?

For example, what did you do to her or communicate to her?

ANSWER:

42. State the facts as to how you intended to corrupt Brienna DuBorgel's morals prior to July

9, 2010? For example, what did you do to her or communicate to her?

ANSWER:

43. Before July 9, 2010, did you ever touch any part of Brienna DuBorgel's body with any

part of your body?

ANSWER:

44. On what dates did you take specific actions or make specific statements (as stated above)

that corrupted or intended to corrupt Brienna DuBorgel's morals prior to July 9, 2010?

ANSWER:

45. List each college or university where you attended any classes (on-line or in person) and

state the years you attended classes at each college or university.

ANSWER:

46. Did you attend classes at any time at Duquesne University?

If "yes", state the dates you attended classes at Duquesne University.

ANSWER:

47. Did you attend classes at any time at the University of Scranton?

If "yes", state the dates you attended classes at the University of Scranton.

ANSWER:

48. Do you have any information or knowledge that the AT&T phone records (ST 515-521) supplied by Linda Vachino DuBergel to Joseph Moseyounas are not true, accurate and authentic?

If "yes", set forth in detail all such information or knowledge.

ANSWER:

49. Did you send Brienna DuBorgel numerous text messages on January 8, 2009?

ANSWER:

50. Did you ever send text messages to Brienna DuBorgel about her use of marijuana prior to 7/9/2010?

ANSWER:

51. Do you have any information or knowledge that the AT&T wireless bills with wireless details for phone number 570-510-7619 (ST 3193-3499) covering the time period from 2/14/2010 to 3/12/2010 are not authentic?

If "yes", set forth in detail all such information of knowledge.

ANSWER:

52. What was the date you commenced your subscription-based Locals (Locals.com) platform?

ANSWER:

53. State the number of your paid subscribers each month on Locals since you began live-streaming on Locals.

ANSWER:

54. In your post to a Telegram chat room on 2/28/22 you stated: "Of late, I have been summoned and called upon to lead a very complex, very covert operation to restore the Republic of America to it's people." (See ST 3525.)

- a) Identify who summoned and called upon you?
- b) State the details of the covert operation you performed in response to being summoned and called upon as stated in this post.

ANSWER:

55. What is The Great Awakening?

ANSWER:

56. What is the Cabal as you use that term during your Live shows?

ANSWER:

57. What actions did you take to promote or fulfill The Great Awakening in 2022 as referred to by you on ST 3525? (Include any and all covert or clandestine operations you participated in to effectuate or promote The Great Awakening.)

ANSWER:

58. Are you an Anon?

ANSWER:

59. Are you a leader in the QAnon movement or The Great Awakening movement?

ANSWER:

60. What is The Storm as you have referred to it during your live shows?

ANSWER:

61. Identify the source you referenced in your video on rumble.com/c/PhilGodlewski named
The Primary – August 3rd, 2022 for your statement that the U.S. Supreme Court already
over-turned the results of the 2020 Presidential election.

ANSWER:

62. Have you seen documents from the U.S. Supreme Court over-turning the 2020 election?

ANSWER:

63. Was your cell phone for phone number 570-780-4567 taken from you by police or detectives at any time in 2010 or 2011?

- If "yes":
- (a) Who took it?
 - (b) When was it taken and how long did they have it?
 - (c) Did the police or detectives advise you about the results of any forensic analysis done on your phone? If "yes", who advised you of the results and what did he/she state?

ANSWER:

64. Did you or your attorney have your cell phone for phone number 570-780-4567 examined by any experts?

- If "yes":
- (a) Name the person or company who examined your phone?
 - (b) When was your phone examined by an expert?
 - (c) Were you given any reports on such examination?
 - i. Do you still have these reports?

ANSWER:

65. Identify all your sources for the statements you made claiming George H. W. Bush and George W. Bush tortured children to produce adrenochrome and then George H.W. Bush and George W. Bush ate the brains of children.

ANSWER:

66. Identify any and all "elites" (your term), politicians, and actors/actresses the you reported publicly on social media since November 1, 2020 to have tortured or killed children as part of the Cabal.

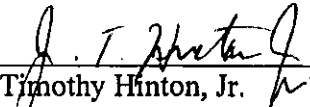
ANSWER:

67. Identify all people you sent refunds to who gave you donations for your legal fees in this lawsuit.

ANSWER:

Date: 5-15-2023

Respectfully submitted:



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, The Scranton Times, L.P. and
Larry Holeva

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY

: CIVIL DIVISION

: JURY TRIAL DEMANDED

: No.: 2021-CV-2195


.....
CERTIFICATE OF SERVICE

I, **J. Timothy Hinton, Jr., Esquire**, certify that on this 15th day of May 2023, I caused a true and correct copy of the foregoing Interrogatories (Set VIII) to Plaintiff to be served upon the following parties via electronic mail:

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

Respectfully submitted:

Date: 5-15-23



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, The Scranton Times, L.P. and
Larry Holeva

**HAGGERTY
HINTON &
COSGROVE LLP**
ATTORNEYS AT LAW

Telephone 570-344-9845 • Fax 570-343-9731 • 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 • hhc@haggertylaw.net

Joseph O. Haggerty, Jr.
J. Timothy Hinton, Jr.*
Michael F. Cosgrove
Matthew E. Haggerty - Of Counsel

April 28, 2023

EMAIL ONLY Tkolman@kolmanlaw.com

Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Penndel, PA 19047

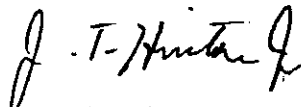
Re: Philip Godlewski vs. Chris Kelly,
et al.
No. 2021-CV-2195

Dear Attorney Kolman:

Enclosed are a Defendants' Requests for Admission to Plaintiff (Set V).

Thank you.

Very truly yours,



J. Timothy Hinton, Jr.

JTH:jls
Encl.

*Certified Civil Trial Advocate By National Board Of Trial Advocacy,
A Pennsylvania Supreme Court Accredited Agency



hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Friday, April 28, 2023 2:19 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'
Subject: Godlewski v. Kelly, et al. 2021-CV-2195
Attachments: Defs Requests for Admission Set V.pdf

Dear Attorney Kolman:

Please see the attached letter from Attorney Hinton with Requests for Admission (Set V).

Thank you.

Jennifer Smolley
Assistant to J. Timothy Hinton, Jr.

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731



This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

PHILIP GODLEWSKI,	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	OF LACKAWANNA COUNTY
	:	
v.	:	CIVIL DIVISION
	:	
CHRIS KELLY, TIMES SHAMROCK	:	JURY TRIAL DEMANDED
COMMUNICATIONS, THE SCRANTON	:	
TIMES-TRIBUNE, LARRY HOLEVA	:	
Defendants.	:	No.: 2021-CV-2195

.....

DEFENDANTS' REQUESTS FOR ADMISSION TO PLAINTIFF (SET V)

Pursuant to Pa. Rule of Civil Procedure 4014, Defendants, Chris Kelly, The Scranton Times. L.P. and Larry Holeva (hereinafter referred to as "Defendants"), by and through their counsel, Haggerty Hinton & Cosgrove LLP, request that Plaintiff Philip Godlewski, admit the following requests in writing, and serve his responses upon the undersigned attorneys at Haggerty Hinton & Cosgrove LLP, 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 within thirty (30) days of service of these requests for admission.

INSTRUCTIONS

The following are written Requests for Admissions are made pursuant to Pa. R.C.P. 4014 and Plaintiff requires strict compliance with that Rule. Each Request is made to you to admit to the truth of matters within the scope of the Pa. Rules of Civil Procedure 4003.1 through 4003.5, that relate to statements or opinions of fact or the application of law to fact, including the genuineness, authenticity, correctness, execution, signing, delivery, mailing or receipt of any document described in the Request.

Each Request is separately set forth. The matter of each Request is admitted unless, within thirty (30) days after service of the Request, you serve a verified Answer or an Objection signed by your counsel or by yourself to same. If you enter an Objection, the reasons therefore must be specifically stated. Each and every Answer must admit or deny the matter or set forth in

detail the reasons why you cannot truthfully do so. Any denial must fairly meet the substance of the requested Admission and, when good faith requires, you must admit to any part of each Request that is true with qualification of your answer, if appropriate. You may not give lack of information or knowledge as a reason for failure to admit or deny any Request. You may not respond that each matter of each Request for Admission is a genuine issue for trial. You are required to set forth each and every reason why you cannot admit to the following or you must deny same.

DEFINITIONS

To avoid any possibility of confusion with respect to these requests, please note that the following terms have the following meanings in these requests, unless a particular request clearly indicates otherwise:

“You” or “your” refer to Plaintiff, Philip Godlewski.

“Defendants” mean, Chris Kelly, Times Shamrock Communications, The Scranton Times-Tribune and Larry Holeva.

“Electronic message” means any electronic text or media content exchanged between two or more users of a software application. Electronic messages include both SMS messages sent over cellular networks and messages sent over the Internet using applications such as WhatsApp, iMessage, Facebook Messenger, Twitter (via direct message), Slack, Google Chat, etc.

“Communication” means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more PERSONS, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, transcribed voice-mail messages, text messages (SMS), iMessages, meetings, discussions, releases, statements, reports, publications, or any recordings or reproductions thereof.

REQUESTS FOR ADMISSION

1. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I don't have to get them [the files from his criminal case] from the courthouse. I don't have to get them from the courthouse, I have them at my house.”

ANSWER:

2. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I just paid \$250,000. Some of my money, but mostly of my family's money, just to get out of jail.”

ANSWER:

3. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“That was no option for me to use a bail bondsman at the time.”

ANSWER:

4. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“my family bailed me out for \$250,000.”

ANSWER:

5. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I was never once alone with her [Brienna DuBorgel]. Never. Not once. I never so much as touched her hand. I never said an inappropriate word to her.”

ANSWER:

6. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Now, did I corrupt her morals? I think the answer to that is yes. I think I did. And I think I did because – this is tough for me because I see it both ways.

I was in a position of authority. I coached – and by the way, I don't know how many of you think I coached her on her softball team. That's bullshit. I coached the junior varsity boys baseball team.

That's what I was the coach of.

Yeah, Riverside Vikings. It was the junior varsity boys. I never coached girls ever. So whoever says that, they're just completely lying.

Anyway, did I corrupt her morals? By the definition of that charge that I did plead to, I think yes because if you read the charge, it's code 6301 in the Pennsylvania statute.

It says did you corrupt or intend to corrupt if you're over 18 years of age? Did you corrupt or intend to corrupt the morals of someone under the age of 18?

It's a very loosey – and that's all it says. There's nothing about sexually or anything that you guys like to throw out there to make me look worse than I actually am.

There's no sexual anything related to any of that. Those charges come in with the misdemeanor 2 and the misdemeanor 3 in Pennsylvania.

The 3 is the worst one because you have to register as a sex offender and the second one is assault. You don't have to register, I don't think, but it does have to do with sexual charges.

The misdemeanor 1 that I took has nothing to do with it. It just has to do with corruption of morals. Did you or did you intend to corrupt the morals of someone under 18?

Did I? I'm 25. By the way, she was never 14. That's another thing that the paper lied about and then misinformed you guys about. I never knew her when she was 14 at all.

I never had any sort of conversation with her at that point. When I talked to her after Joe hung himself-”

ANSWER:

7. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“No, she wasn't born in 93. No, that's not true. Here's how it happened. I turned 25 in June of that summer and she turned 15 –

I'm sorry, she turned 16 in September of that same year. Her birthday was in September. So there was approximately almost outside of three months a nine-year difference between us.

So in that regard, did I, being in a position of a baseball coach of the boys' team – I'm coaching her friends essentially of the same age –

did I corrupt her morals by even having a conversation with her of that magnitude?... I think the answer is yes.”

ANSWER:

8. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“So I wasn't fucking around with this.

I literally needed good defense to prove my innocence.

So I hire all these guys, get back to the text message thing, and the very first thing that we had to do was prove that I did not say anything of a sexual or even an inappropriate nature to this girl.

There were text messages that I had with the girl, but let me tell you what she did. This girl was conniving.

She – there were – I don't know if thousands. That might be a little, you know, far-fetched.

But I did have several, at least several hundred text messages with this girl.

Every single one of them were about the death of my good friend and her boyfriend.

We were both equally attached. So there are messages that exist. So here's what she did, Will...

I don't think I had any place whatsoever in that situation to be speaking to her at all, whether it's in person, you know, whether it's at the games, like you said, whether it's on the phone, whether it's through text message.

That in itself is corrupting, is of a corrupting nature.

Listen, I've given her the wrong idea, exactly. And guys, I fucked up. What do you want me to say?"

ANSWER:

9. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

"Johnny, I said to her, why don't we talk to your guidance counselor?

I knew the guidance counselor at the school very, very well. He was a good friend of mine.

And I wanted to talk to her mother. She was threatening suicide.

And she said, if you go tell somebody that I'm threatening suicide, I'm just going to do it.

And I got to tell you guys, I 100% believed that she would.

She was at the end of her rope.

And I honestly thought in my soul, in every fabric of my being, that if I went to a guidance counselor or her mother or the police,

I thought she was going to kill herself, and I could not have her death on my conscience."

ANSWER:

10. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I worked with my family all the way up until I was 28 years old. I never got paid for working down there.”

ANSWER:

11. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Anyway. Oh. So here's what she does. Now, again, I'm not trying to talk negatively about this girl, but I think you need to know what position she put me in and what we proved she did.

When she submitted these text messages to the district attorney's office, right, she brings her phone records.

Well, it wasn't even her that did it. It was her mother. Her mother wanted to sue me big time civilly, like we talked about earlier.

So she takes the Verizon phone records showing all of the text messages going back and forth, and back then, they weren't iMessages.

iMessages, if you guys ever looked it up, they don't show on a phone statement out of phone records. Text messages do.

So if you – sorry, guys. I ate sushi tonight. I keep burping like an idiot.

That's why I keep pausing because I can't breathe. A text message will show on a phone record statement. An iMessage will not.

But back then, even iPhone to iPhone was showing as text messaging on phone records.

So her mother brings the phone logs showing all of these text messages from my same phone number that I have now, the 4567 number, to her daughter's number, and there are several hundred.

And in the sense that I said before, am I guilty of corrupting in the sense of the plea that I pled to? Yes, because of this, to answer Will's question from earlier.

Now, she takes those messages or those phone records coupled with fabricated screenshots.

I don't want to say fabricated because they actually did occur, but it wasn't with me.

This girl had conversations with her friends and masked it as conversations with me, meaning that they went to like an internet text messaging app, and they put in my name, and they screenshotted all the conversations, really nasty shit.

And they said, oh, here's the phone records from Verizon. Oh, here's screenshots of what they talked about. Oh, look, by the way, the timestamps match because you could do that.”

ANSWER:

12. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Guys, this ruined my life.
Do you guys see how many people out there throw this in my face all the time?
Now, you could decide for yourself if I'm telling the truth or not, but I don't even have to be here tonight.
I don't care if you guys continue on with channels. That stuff's fine with me. It's okay. I don't mind it.
But truthfully speaking, I have to answer for this every single day of my life.”

ANSWER:

13. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“we systematically start to disprove every single thing that they said in those police reports.
We got interviews with parents of kids that she told their son or daughter that she was lying about this whole thing.”

ANSWER:

14. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“But I think her mother, I don't know this. It's just speculation on my part.
But I think her mother saw dollar signs with me.”

ANSWER:

15. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I had a courtroom full of people ready to come onto the stand to disprove it beyond the shadow of a doubt.
They didn't present it that day, and that's why Patty Lafferty's eyes went to the back of the courtroom that day.
When the judge asked her to present her evidence, she looked back and looked at all the people I had ready to come up.
They were all sitting right fucking behind me.”

ANSWER:

16. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“No, that is absolutely not true. Now, I, over the years, I was a bad person.
You know, I didn't, I, fuck, I didn't believe in God. I, I, I had a, it was rough.
I, I've forgiven her for this.
I have, you know, talked, talked to her on multiple occasions about this and, and we, you know, let bygones be bygones.
I apologized to her. She apologized to me. We both had things to apologize for.
But as far as like being around town or whatever you just said, absolutely not.
Have we formed a understanding and a, you know, mutual agreement to just forget about it and not bad mouth each other and stuff like that?
Yeah, we have. That's, that's true. But there's no, like hanging out.”

ANSWER:

17. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“No. And that's, that's where this whole thing started. There are people amongst your channel or your group or whatever you want to call it that just completely fabricate things completely. And you guys, I mean, I, like I said, I don't mind the channel and I've come to grips with the fact that there's going to be people that don't like me. There's nothing I could do about that. And that's fine. You know, you don't have to like me. I don't, I don't not trying to change it in your minds. So I'm just answering your questions tonight. That's all I'm doing. But there are people within your group that just completely make stuff up. That's so farfetched. That's, it's just unspeakable, the things that people say. And it's, it's so obvious to me anyway. It's so obvious when like these completely kooky theories come out. And that's, that's one that I've actually never heard before, Katie, but some of it is such bullshit. I'll tell you who does a good job. Will. Will does a good job.”

ANSWER:

18. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Not accurate. I never went to those schools [University of Scranton, Duquesne University]. Never.”

ANSWER:

19. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“so johnny. Uh when I said that she apologized I also apologized to her. It was a bad time in our life. And what I said earlier was That we both moved on for it. Why did she apologize to me because she made shit up. And she knew she did and that's why”

ANSWER:

20. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I think I I think I corrupted her in the sense that, Uh, I put myself in that position that I was even speaking to her and I allowed myself, Uh, I allowed her to think that there was something that there was not, meaning that I allowed her to develop some sort of feelings for me”

ANSWER:

21. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Great. Thank you so much for the floor. The definition of corruption of a minor 6301 misdemeanor class one is that any person above the age of 18 who corrupts or intends to corrupt the morals of a person under the age of 18 is considered a criminal offense misdemeanor one. I believe I did exactly that. ... I think, In my opinion, I think that me putting myself in that position as an authoritative figure qualifies for me to be guilty of that charge. And that's my opinion.”

ANSWER:

22. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“It’s it’s called unquantifiable. So I don't know how many people I actually lost because those people are never going to tell you that oh I’m not listening to him anymore because of what Erica said or because of what The Authority said or because of what Jeanette said Jeanette went on a whole rampage and started like you know audios that she put out there telling people that I was scamming the elderly. How do you prove that? She’s going to have a really hard time bringing anyone to court in discovery that says I scammed them out of money.

And if she does bring somebody then that person's going to have to prove it and here’s the problem with Jeannette’s case, I didn't scam anybody out of anything. In fact, I’ll bring 50,000 people to that same discovery process that say I helped them financially with this company. So Jeanette has a huge problem. Erica has a huge problem.”

ANSWER:

23. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“Yeah, it’s called um, without getting into too much detail. It's just called. Uh, the the the entirety of what we're talking about right now is classified as a Legacy. ...

No, it’s it’s classified some of the things that you're talking about. Jessa are um, Stories, designed to make you think one thing that didn't actually happen.”

ANSWER:

24. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“I didn't say in savage chat that I had a graduate degree.”

ANSWER:

25. Do you admit that you made the following verbal statements on May 3, 2022 in a Telegram voice chat with other persons?

“So my attorney subpoenaed the text messages from Verizon. Yes. ...
But you see here's the thing that thought has gone through my mind many times.
There is nothing I could do to prove to you guys something that you don't want to be true.
I could show you every one of those text messages and all these people are still going to
be or maybe a couple of you
Drop a couple you believe me believe me
But it's just too much effort. I don't I don't see any reason why I have to defend myself
like that
I honestly don't know why I'm here tonight
Five hours, I've been here talking to you guys. That's bizarre...
Because it won't matter Sarah. It won't matter you guys will say I made you guys will say
I made them up. The next thing will be all will he forged bank statements? Why wouldn't
he be able to forge text messages? right? I mean, that's exactly what will happen”

ANSWER:

26. Do you admit that you made the following verbal statements on June 8, 2022 during a video interview with Will Byrd?

“But I've talked to her many times over the years. We were put into circumstances that neither of us knew how to handle. All of the accusations, most of the accusations, other than the fact that I did speak to her and I did have you know a friendship with her, even though it was probably in an inappropriate age gap. Oops, sorry. It was really just a friendship type thing. But over the years, we have reconciled, we have become friends or remain friends. And I don't wanna talk too much to the point, but the Scranton Times is in for a real surprise.”

ANSWER:

27. Do you admit that you made the following verbal statements on June 8, 2022 during a video interview with Will Byrd?

“I don’t know exactly what he was trying to do there. But nonetheless, that’s defamation in itself. So, they now have to try to prove the fact the allegation that I slept with a minor. And the problem with that is they can’t do that because that didn’t happen. And what they’re not prepared for is the deposition of the victim.”

ANSWER:

28. Do you admit that on January 25, 2021 you made a video which has been viewed by thousands of people during which you stated that “the global cabal is about to be brought down because of pedophilia”?

ANSWER:

29. Do you admit that on June 11, 2021 you made a video which has been viewed by thousands of people during which you stated Tom Hanks is not alive and “Tom Hanks is one of the biggest child molesters the world has ever seen”?

ANSWER:

30. Do you admit that on May 26, 2022 you made a video show which has been viewed by thousands of people during which you stated that Joe Biden was a child predator and he was executed years ago?

ANSWER:

31. Do you admit that on January 25, 2021 you made a broadcast video which has been viewed by thousands of people during which you stated John McCain was put to death?

ANSWER:

32. Do you admit that on January 25, 2021 you made a broadcast video which has been viewed by thousands of people during which you stated Christopher Cuomo tortures, rapes and kills children?

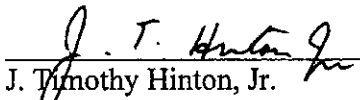
ANSWER:

33. Do you admit that on January 25, 2021 you made a broadcast video which has been viewed by thousands of people during which you stated George H.W. Bush did not die of natural causes?

ANSWER:

Date: 4-28-2023

Respectfully submitted:



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, Times Shamrock
Communications, The Scranton Times-
Tribune and Larry Holeva

PHILIP GODLEWSKI,
Plaintiff

v.

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

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY

: CIVIL DIVISION

: JURY TRIAL DEMANDED

: No.: 2021-CV-2195

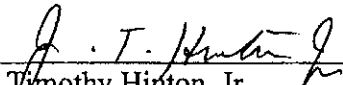
CERTIFICATE OF SERVICE

I, **J. Timothy Hinton, Jr., Esquire**, certify that on this 28th day of April 2023, I caused a true and correct copy of the foregoing Defendants' Requests Admission (Set V) propounded upon Plaintiff to be served upon the following party by electronic mail:

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

Respectfully submitted:

Date: 4-28-2023



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, Times Shamrock
Communications, The Scranton Times-
Tribune and Larry Holeva

**HAGGERTY
HINTON &
COSGROVE LLP**
ATTORNEYS AT LAW

Telephone 570-344-9845 • Fax 570-343-9731 • 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 • hhc@haggertylaw.net

Joseph O. Haggerty, Jr.
J. Timothy Hinton, Jr.*
Michael F. Cosgrove
Matthew E. Haggerty - Of Counsel

May 15, 2023

VIA EMAIL ONLY
tkolman@kolmanlaw.com

Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Penndel, PA 19047

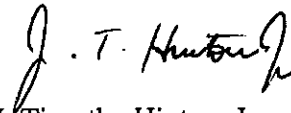
Re: Philip Godlewski vs. Chris Kelly,
et al.
No. 2021-CV-2195

Dear Attorney Kolman:

Enclosed are a Defendants' Requests for Admissions to Plaintiff (Set VI).

Thank you.

Very truly yours,



J. Timothy Hinton, Jr.

JTH:jl
Encls.



hhc@haggertylaw.net

From: hhc@haggertylaw.net
Sent: Monday, May 15, 2023 1:43 PM
To: TKolman@kolmanlaw.com
Cc: 'Kathleen A. Carrozza'; J. Timothy Hinton, Jr.
Subject: Godlewski v. Kelly, et al.
Attachments: Defs Req for Admissions Set VI.pdf

Dear Attorney Kolman:

Please see the attached letter from Attorney Hinton with Defendants' Requests for Admissions to Plaintiff (Set VI).

Thank you.

Jennifer Smolley

Haggerty Hinton & Cosgrove LLP
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
hhc@haggertylaw.net
Ph. (570) 344-9845
Fax (570) 343-9731

This message and all attachments are confidential and may be protected by the attorney-client privilege as well as other privileges. Any review, use, disclosure or distribution by persons other than the intended recipients is prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this electronic mail or contact the Office of Haggerty Hinton & Cosgrove LLP and delete this message as well as any copied version without disclosing it. Thank you for your anticipated cooperation.

PHILIP GODLEWSKI,	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	OF LACKAWANNA COUNTY
	:	
v.	:	CIVIL DIVISION
	:	
CHRIS KELLY, TIMES SHAMROCK	:	JURY TRIAL DEMANDED
COMMUNICATIONS, THE SCRANTON	:	
TIMES-TRIBUNE, LARRY HOLEVA	:	
Defendants.	:	No.: 2021-CV-2195

.....

DEFENDANTS' REQUESTS FOR ADMISSIONS TO PLAINTIFF (SET VI)

Pursuant to Pa. Rule of Civil Procedure 4014, Defendants, Chris Kelly, The Scranton Times. L.P. and Larry Holeva (hereinafter referred to as "Defendants"), by and through their counsel, Haggerty Hinton & Cosgrove LLP, request that Plaintiff Philip Godlewski, admit the following requests in writing, and serve his responses upon the undersigned attorneys at Haggerty Hinton & Cosgrove LLP, 1401 Monroe Ave., Suite 2, Dunmore, PA 18509 within thirty (30) days of service of these requests for admission.

INSTRUCTIONS

The following are written Requests for Admissions are made pursuant to Pa. R.C.P. 4014 and Plaintiff requires strict compliance with that Rule. Each Request is made to you to admit to the truth of matters within the scope of the Pa. Rules of Civil Procedure 4003.1 through 4003.5, that relate to statements or opinions of fact or the application of law to fact, including the genuineness, authenticity, correctness, execution, signing, delivery, mailing or receipt of any document described in the Request.

Each Request is separately set forth. The matter of each Request is admitted unless, within thirty (30) days after service of the Request, you serve a verified Answer or an Objection signed by your counsel or by yourself to same. If you enter an Objection, the reasons therefore must be specifically stated. Each and every Answer must admit or deny the matter or set forth in detail the reasons why you cannot truthfully do so. Any denial must fairly meet the substance of

the requested Admission and, when good faith requires, you must admit to any part of each Request that is true with qualification of your answer, if appropriate. You may not give lack of information or knowledge as a reason for failure to admit or deny any Request. You may not respond that each matter of each Request for Admission is a genuine issue for trial. You are required to set forth each and every reason why you cannot admit to the following or you must deny same.

DEFINITIONS

To avoid any possibility of confusion with respect to these requests, please note that the following terms have the following meanings in these requests, unless a particular request clearly indicates otherwise:

“You” or “your” refer to Plaintiff, Philip Godlewski.

“Defendants” mean, Chris Kelly, Times Shamrock Communications, The Scranton Times-Tribune and Larry Holeva.

“Electronic message” means any electronic text or media content exchanged between two or more users of a software application. Electronic messages include both SMS messages sent over cellular networks and messages sent over the Internet using applications such as WhatsApp, iMessage, Facebook Messenger, Twitter (via direct message), Slack, Google Chat, etc.

“Communication” means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more PERSONS, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, transcribed voice-mail messages, text messages (SMS), iMessages, meetings, discussions, releases, statements, reports, publications, or any recordings or reproductions thereof.

REQUESTS FOR ADMISSION

1. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 9, 2021?

(See the Updates for January 9, 2021 video posted to Rumble at approximately 57:29-1:00:48)

“If I'm right about what I'm saying, and if you believe me, I think what you're in for is massive arrests of most of Congress, including some very high-level names.”

ANSWER:

2. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 9, 2021?

(See the Updates for January 9, 2021 video posted to Rumble at approximately 1:16:25-1:21:20)

“And then it trickles down to these piece of shits like Raffensperger, Stacey Abrams, Governor Cuomo, Gavin Newsom from California. Those guys are like tiny little pieces of shits on this big, massive, you know, government, world government pyramid, right? Now, they're tiny pieces of shits, but they think that they're so friggin' important because they're in with the New World Order.”

ANSWER:

3. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 30:20-32:54)

“I don't know if you guys know this, but I was in USA Today. I don't know what. Evidently my tweet about Mike Pence being arrested, I tweeted that, multiple reports of Mike Pence being arrested. And there were, I read that in multiple places. The USA Today, out of all the millions of people must have retweeted and shared and posted something very similar about Pence. I was the one that was singled out. Out of all the people in the country, I was the one that was singled out for that particular quote.”

ANSWER:

4. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“Massive rumor that I'm going to confirm for you right now. Donald Trump, last night, signed the Insurrection Act.”

ANSWER:

5. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“The Insurrection Act gives the President the authority to do multiple things. It gives the President the authority to do multiple things. First of all, he could declare martial law.”

ANSWER:

6. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“I strongly believe that some sort of martial law is going to come to every area of the country.”

ANSWER:

7. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“So what should you do to prepare for that? Number one, make sure you have whatever medications you're on. If you're a diabetic, make sure you have your insulin. If you need heart medication, make sure you have that. For how long? I would say at least the next couple of weeks just in case. We don't know how long things are going to be up in the air here. It may spill over past the 20th.”

ANSWER:

8. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“So I don't, I don't worry about losing power too much, but what you should worry about is having your medication, having enough food, so that if you can't get to wherever you need to go to shop, whether it's Walmart, whether it's your local grocery store, whether it's your butcher, whether no matter what it is, if you can't get to it, you need to have enough food in the house. You should go and do that today because I do think the hammer's gonna drop on this within the next 24 hours or thereabouts. So don't mess around.”

ANSWER:

9. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“Another thing that the insurrection act is going to enable Donald Trump to do is enact the emergency broadcast system. The emergency broadcast system is going to take over the airwaves. So even the most left-leaning liberal networks that are out there, be it CNN or Fox News or really any of them, if they do not put the emergency broadcast system on their network, they lose their FCC license, which means they can no longer broadcast in the United States.”

ANSWER:

10. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“over the emergency broadcast system is announcements from President Trump, from the military and so forth telling us what is happening, what you could expect, what you should do, what you shouldn't do, what happens if you do the things that you're being told not to do. And I've also heard just today that there's going to be eight-hour blocks of information that is spread through the emergency broadcast system network. The eight-hour blocks are going to be a presentation, essentially, of information regarding not only the election fraud...

Yeah, it's about the election and the attempted coup, but we have major, major global issues. And I was reporting last month, it was before Christmas, mid-December, I think, early December, that there were 209 global indictments that were sealed. I think a lot of people are gonna end up in prison for a long time, or worse. So brace yourselves, please brace yourselves.”

ANSWER:

11. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“I think we're gonna have a suspension of habeas corpus...

This coincides a little bit with habeas corpus. So habeas corpus, as we talked about many times, is the suspension of your rights as a citizen if you get arrested. You have the right to an attorney, you have the right to a fair trial, you have the right to a jury of your peers, and so forth, all that stuff. An arraignment, probable cause affidavits, all that stuff, right? Suspending habeas corpus strips you of all of those rights. So in other words, if you don't have rights as an American citizen regarding your arrest, they can literally just pick you up and take you away by force.”

ANSWER:

12. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 38:42-58:52)

“So I think that a lot of people within our government, the corrupt politicians that we've been hoping to get out of here for years, as well as the higher up deep state operatives, such as Obama, Hillary, Soros, and others, I think that you're gonna see massive arrests. That's what these indictments that we've been hearing about for years now are going to put us. They're just gonna pick them up, detain them, figure it out later. So that's another part of the Insurrection Act that I think is coming...

So what happens after these people get picked up, arrested, do they go to court? No, they don't go to the court system that you're used to. They go to a military court with a military judge, a military defense attorney, and a military prosecutor. It's completely outside of the system that you're used to with the local courts and the magistrate, the federal courts and the county courts, completely outside of that. It's going to be a military trial. It's going to be a military operation. This entire thing that we're talking about, entire thing that we're talking about is, and has been, a military operation from the very beginning. So brace yourselves for that type of thing. I think that we may end up seeing the military trials on television as well through the emergency broadcast system. This is all necessary for the non-believers to believe. I think that people that are so far left of center when it comes to politics, they have to see this stuff to believe it. And unless they see it in person,

They're not going to believe it. Unless they see it with their own eyes, the evidence with their own eyes. All of this evidence, if it were in the regular court system the regular statutory process of the courts, none of it would ever get out. In this case, a military tribunal at will. And people will realize that we are not crazy anymore. I'm expecting a lot of apologies from a lot of people. I don't care if they do or not, but I'm expecting a lot of apologies from a lot of people over the next several months, because I am not crazy. And just because I'm a little bit more abreast of, you know, grassroots information, such as all the Q information that I've been following for years. That doesn't make me nuts. That just makes me more informed. And I think you guys, a lot of you have become a lot more informed over the last several months. And I promise you it's not in, it wasn't for nothing. This is all happening how we thought. I think tomorrow is gonna be a big day.

ANSWER:

13. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 1:01:00-1:04:12)

"Comfort them, tell them what's gonna come next. You guys know, right, you've seen most of the Q drops. You've heard me report, I'm gonna keep trying to report, you may be without internet for a while, I don't know. So if that's the case, I'm gonna try to do these lives once a day going forward until this is all over. If we run out of electricity or internet, obviously I can't. So for those people that used to think you were nuts that are going to be turning soon, they're gonna come to you that are listening to this because you guys have the information and they do not, and they're gonna rely on you.

ANSWER:

14. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 1:14:10-1:19:57)

"All the banks in the country actually borrow from the Federal Reserve, which is a private entity owned by the Rothschild family, who are high up on the cabal pyramid, right? If we, as a country, and other countries within our world, within the world, just say, you know what, we're not paying you guys back anymore...

But yeah, that's how the Nesara would work. The Rothschilds are not gonna like it,

but half of their posse is gonna be in jail anyway, right? Or executed. Now, it's not a coincidence that the firing squads and hangings were brought back two months ago. You really think that's coincidence? All you guys that are naysayers that don't believe anything that I'm saying, think I'm just completely a lunatic, don't these things start lining up for you to show you otherwise? I don't get it."

ANSWER:

15. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 1:23:00-1:24:30)

"So if Nesara gets enacted, you also wouldn't owe any more income tax for the rest of your life as long as Nesara is enacted. And you would also, any past tax debt that you may have would also be forgiven. And you would also pay no more sales tax either because all that stuff goes to the Federal Reserve through the IRS. The IRS will be obliterated."

ANSWER:

16. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named January 10th, 2021?

(See the January 10th, 2021 video posted to Rumble at approximately 127:10-1:28-05)

"So yeah, college debt will also be forgiven if he enacts it. Listen, I'm not the guy that enacts Nesara. I don't want you guys to take this the wrong way, okay? I'm not the one that says all your debt is forgiven. That's not, Trump will do it, okay? And he hasn't done it yet, and I think there's a priority here of going in order to retain the presidency, let's arrest people and whatever."

ANSWER:

17. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 10:56-11:43)

“So as I told you guys many times before, I don't do this for a living and I'm not looking to, but I am going to continue live streaming even after this is all over. Because one way or another, if Trump comes through and saves our country, which again, as of today, I'm 100% positive that everything we've been talking about over the last several days. I do believe 100% that Trump is going to be your president for the next four years.”

ANSWER:

18. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 23:00-27:15)

“But nonetheless, I think that you're gonna see very high profile arrests just regarding Obama-gate and not regarding anything else. I think Obama himself through a special counsel is going to be investigated, indicted and arrested. And that's assuming that all of the "conspiracy" information that we've been talking about for the last several years throughout the Q community, throughout the Anons does not get them first.”

ANSWER:

19. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 32:45-37:50)

“The siege on the Capitol, the actual breaking in on the Capitol, there's video of the police officers letting people in. The DC police just letting them in the doors, that wasn't

a break in. Yeah, there's a couple videos with smashing windows and stuff like that, but those poor people, all they had to do was walk around the side of the building to the front entrance and they would have been let in. So this was all an enormous setup, I think, to impeach Donald Trump.”

ANSWER:

20. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 50:40-52:35)

“They’re sleeping in the Capitol and this started days ago, right? For an inauguration on the 20th. That’s still six days away. They’ve been there for several days bus loads and bus loads. Putting up fences if we know about the fence. What else is in place? I’ve been reporting for several weeks that there is massive arrests imminent.”

ANSWER:

21. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 1:14:50-1:17:20)

“But why would the CEO of Twitter, in a message to his employees, mention QAnon as being dangerous? We're not dangerous in the sense of what? Dangerous in the sense of information? Yeah, we're hell of a dangerous then. Absolutely. You know why? Because QAnon followers are intelligent. And we have the ability to decode. And if someone shows us a photo, we're going to find something in that photo that's the secret message in that photo, if there is one. I'm not saying that every photo is a secret message. Don't get me wrong. But we are not going to take no for an answer. We are not going to go with the flow. We're not going to do that. We're just not going to do that. But why does he mention us as a radical group? We're not a radical group. We're being painted as a radical group because we're able to connect the dots and expose the bullshit. That's why he wants us censored, and that's why he's going to continue to do

it. My QAnon account on Twitter that I've had for years is busted. All my followers are gone.”

ANSWER:

22. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 1:14:50-1:17:20)

“If Biden gets inaugurated and Kamala Harris gets inaugurated, Kamala goes to the Vice President and Trump is not your President and that is not going to happen. There's not a scenario that I see Donald Trump saying, okay, I'm out, whatever. So anybody that says that, I'm sorry, I don't care who it is, I don't care how many followers they have, it doesn't matter. They're just wrong.”

ANSWER:

23. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 1:34:00-1:30:50)

“Does Trump have the support of the army for martial law or insurrection act? Does he really have their support? So I like that question. And this is the last question I'm gonna take it's getting late. But if I'm right, and if Q is real, and if the Anons are not crazy, the millions and millions of us that are out there, this entire operation to save the country is a military operation. It's not a Trump operation.”

ANSWER:

24. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Updates for January 14th, 2020 [January 14th, 2021]?

(See the Updates for January 14th, 2020 [January 14th, 2021] video posted to Rumble at approximately 1:34:00-1:30:50)

“So we're on the right path. The military 100% supports Donald Trump. All Donald Trump has to do is say go. And if he says go, all of this happens. And I'm telling you right now, if he doesn't say go, I think he turned his back on us. All of us and all of our futures. And he's not the type of guy to do that. He's not the type of guy. He's not gonna do it. Truly believe that. More than I did yesterday, more than I did throughout this whole thing.”

ANSWER:

25. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 5:30-17:15)

“I know one thing for sure and I'm 100% sure, well again we talked about Mike Adams right, so it's not I'm saying I'm 100% sure but I cannot be any more sure than I am that Donald Trump is going to continue to be your president number one. Number two, this ends by Wednesday.”

ANSWER:

26. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 5:30-17:15)

“Three years waiting. Yeah, that's what we've been waiting for years. I have literally been waiting for this to happen and if you think for one second then I'm gonna sit back and I'm gonna say, oh, they counted the electoral votes in the Congress and Joe Biden got

all the electors and, you know, just completely give up on this cause and just completely give up on this cause. You're freaking crazy, man. All of the power, all of the possibilities, all of the potential things to happen over the next 72 hours is in the control of one man and that's Donald Trump. He's the only guy that has the ability to turn this whatever way he wants.”

ANSWER:

27. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 5:30-17:15)

“We thought, even I did, initially, after the election I knew there was fraud, you have to be completely blind to not notice the election fraud, completely blind. But the more I researched, the more I went through the Q clock, the more I went through the drops and the post by Q and talked to other Anons, I realized that this entire thing, the whole time, was not about the election, it's about draining the deep state, it's about getting rid of the federal reserve and central banks worldwide, it's about going to a gold-backed currency, it's about removing the powers that be in different countries.”

ANSWER:

28. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 5:30-17:15)

“But I think people in general still think that this must go through the courts in order to be done and it was never going to go through the courts, never. That was never the objective. The courts and the lawsuits and all of the evidence and all that stuff, that was for one purpose and one purpose only and that was to educate the public. And guess what? We've been educated. People like me came out, right. I never told anyone I was a Q follower before November 3rd on Twitter, you know, and then after that I realized, oh boy, you know, this is actually what's going on here. People need to

know and that's what we were told by Q and that's what we've done ever since. Not only me, but millions of other people. All these videos that you post that get you all fired up, I didn't make those videos. They come from another anon, sometimes on the opposite side of the world. QAnon is a global following, a peaceful global following filled with highly intelligent people that take many hours of their day to help figure out what's actually going on. So all of those court lawsuits were nothing but theater. You've heard me say that, please tell me, you've heard me say that dozens of times. They were all for theater, all of them."

ANSWER:

29. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

"He goes into 2020 and he wins 80% of the votes. You guys don't know that yet, I don't think...

Okay, so this guy, despite all those things that happened in the last four years and all the turmoil that he went through, he still goes out and he whoops ass in an election. The Democrats couldn't even put somebody up against this man and get 20% of the vote. Even if they tried, even if they didn't know that they were gonna, even if they didn't wanna do that, they still couldn't pick somebody. Anyone in the group, Beto O'Rourke, Bernie Sanders, there are none of them to beat this guy. So they went with Biden because Biden's a recognizable name, I guess. And they cheated. They cheated and they still lost. They lost so bad in their original cheat that they had to cheat even more and that's what got them caught."

ANSWER:

30. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

“And you think now that he's on the precipice of where he is, three days left in inauguration, you think that he's just gonna say, you got me. You cheated, you won, I've been saying you cheated. I convinced at least half of America, if not more than that, that you did cheat. They all know that you cheated. And now I'm just, I can't take it anymore, guys. I'm out. That's not what's happening, for the love of God. I don't understand how you could even think that. I don't understand it. I'm sick of seeing the comments. I really am. I'm sick of seeing the comments on losing faith today. Nothing's happening today. I told you this entire time, since November 3rd, go back to my Facebook profile where it all started and you tell me if I didn't start saying this around November 3rd, the only day, I see seven people saying block Cleo P. I will, if I can find him.”

ANSWER:

31. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

“And I said this since November 3rd, there's one date that matters in the Constitution and it's not December 18th where the DNI report was due. It's not January 6th where they vote on the electoral votes to certify Biden as the next president. It's not that date. That doesn't matter at all. It doesn't even matter if that happens. One date that matters is January 20th. We are not there yet. We are 100% in control.”

ANSWER:

32. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

“In fact, the outcome has been determined for years. You think all this stuff that Q has been predicting that's coming true is just by chance? Read some of those drops. Go to the public website of QAnon. That's QAnon, Q-A-N-O-N dot P-U-B, as in public.

And in the top left-hand corner, you could search every drop you want by word, by number. You could search a specific word if you want. All of that stuff coming true from McCain to Hillary to Schiff to Pelosi to Pence, all of that stuff coming true.”

ANSWER:

33. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

“Far over 80 million votes, which was the most that a president is, or Q was just there to distract us from something. What did we get distracted from? We got distracted from nothing. It was of no consequence. We came out in masses and we gave the guy the most votes that any presidential candidate has ever received. So the whole misinformation thing about Q is bullshit. And I'm just really upset that you guys are losing, affects your life on a daily basis. Maybe it affects your marriage. Maybe it affects your children. Maybe it affects your job, your anxiety and your worry and your possible depression. I know, please don't let it bother you. This is all under control. How do I know it's under control? Because Donald Trump has all of the power, zero power. They can't do anything to stop it. Nothing. They have no military. They have no political force. Donald Trump is the only political force that matters. The power that he has in his hands from that Insurrection Act to martial law to executive order 13848.”

ANSWER:

34. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 20:50-35:50)

“He's making every single necessary precaution to ensure that he stays president, yet we're still wavering...”

I can't tell you if it's gonna be tomorrow. I could tell you this. Biden is not going to be inaugurated. If that happens, Donald Trump has no further path to the presidency. Once Biden is in control, he is the president and can, through executive orders, basically do whatever the hell he wants. That's not going to happen. Come on, guys, come on."

ANSWER:

35. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 38:20-44:00)

"The people that are within Congress have implicated themselves in the crime of the century, some of them treason. Don't gotta talk about election fraud after that anymore, right? He's had the damn servers since November 8th, 9th from the Frankfurt raid. He's had the servers. He knows about Italy. He knows what Stacey Abrams has done in Georgia. He knows what Doug Ducey is doing in Arizona. He knows all of that. He's just gonna put it in his pocket and be like, shit, they certified Joe Biden. All at the same time, you were seeing three simultaneous transactions. All happening all at the same time. You're seeing Donald Trump take on election fraud. You're seeing a military operation. What the hell is going on in D.C.? There's over 35,000 troops now. Yesterday or last time I went live, there was 20,000, I think, or 24, 35 now. Military-grade weapon. He was never gonna walk away. Those of you that think he is and that are telling me that something's wrong with me because I'm leading people on, listen, if I'm leading you on, I've been led on, too. You understand? I'm in the same boat as you are. I truly believe all of this stuff. Every word of it. And I wasn't the one to start Q. I'm not the one that goes out and creates the news. I report it. You decide. If you think I'm a quack, don't follow me. If you like what I'm reporting, subscribe. Talk to me on Facebook. Twitter suspended me, by the way, today. That got me a little fired up before, too."

ANSWER:

36. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 31st, 2021 [approx. January 17th, 2021]?

(See the Update for January 31st, 2021 video posted to Rumble at approximately 38:20-44:00)

“Zero. Zero percent chance that Joe Biden is ever going to be president of the United States. Zero.”

ANSWER:

37. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 23rd, 2021?

(See the Update for January 23rd, 2021 video posted to Rumble at approximately 50:20-58:30)

“But I think fully we got that guy and if we want to take him down we can take him down at any time. But instead of doing that, instead of him conceding, instead of Trump remaining president, instead of Trump remaining President through removal of Joe Biden I think Joe Biden is capitulating. I think he is doing exactly what he is being told to do by the military and by Donald Trump. Maybe not Donald Trump himself, but whoever is actually in control now. Is it Flynn is it the generals is it who is it who knows doesn't matter, irrelevant. But I completely believe that Joe Biden is being manipulated by the patriots.”

ANSWER:

38. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 23rd, 2021?

(See the Update for January 23rd, 2021 video posted to Rumble at approximately 50:20-58:30)

“Let's go. But the military can remove Joe Biden. He is obviously an illegitimate president. We do have the servers. We know exactly what happened with the fraud. We have all of that evidence that evidence doesn't just disappear that evidence is forever there. We have the server we have the Italy confessions from the members of government in Italy that said that they stole the votes. We have multiple people squawking like crazy from Gina Hasbell to Ruby Freeman so at any time they could pull Joe Biden.”

ANSWER:

39. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 23rd, 2021?

(See the Update for January 23rd, 2021 video posted to Rumble at approximately 50:20-58:30)

“The military, I believe is going to forcefully remove Joe Biden from office. I do believe that insurrection act was signed the military is now in control. I don't know if we're ever if that's ever actually going to be reported to us, but I think the military is going to take him out of office.”

ANSWER:

40. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 23rd, 2021?

(See the Update for January 23rd, 2021 video posted to Rumble at approximately 1:05:50-1:08:34)

“I believe that on or before March 4th Donald J Trump is going to be inaugurated as the 19th president of the United States Republic. I don't believe we're going to be under our original constitution anymore. I don't believe we're going to be in the central bank system anymore the Fed's going to be gone, he bankrupt the United States we don't have to pay back our loans the banks that oh this is all going back to Nesara again and I think this is going to happen throughout the world I think that's why you saw those governments collapse in Europe.”

ANSWER:

41. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for January 23rd, 2021?

(See the Update for January 23rd, 2021 video posted to Rumble at approximately 1:10:30-1:11:30)

“I think Joe Biden's going to be in office for about 30 days. There were queue drops that referenced 30 days done in 30. And I think that's when you're going to see things go down, probably around the first week of February. And then I think by the first week of March, by March 4th on or before March 4th, I think Donald J. Trump is going to be your president once again. I don't know if it's going to be through another election or through default since there was an illegitimate President.”

ANSWER:

42. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for February 11-12, 2021 – 9/11 The Pentagon?

(See the Update for February 11-12, 2021 – 9/11 The Pentagon video posted to Rumble at approximately 11:08-15:20)

“I did give Chris [Kelly] one piece of advice. So hopefully he gets that right in the article. I did tell him that there is no such thing as QAnon. And when you say that, you sound dumb. And to be a better reporter, you should know that there is Q, the entity, and then there are Anons, which are the followers of Q and the movement is called the Great Awakening.”

ANSWER:

43. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for February 11-12, 2021 – 9/11 The Pentagon?

(See the Update for February 11-12, 2021 – 9/11 The Pentagon video posted to Rumble at approximately 27:35-30:30)

“But for you guys tonight you are going to walk out of this live by the end of the live you're going to walk out of here and you are going to have no doubt no doubt that a plane did not hit the Pentagon. It did not happen period. And the same people that are trying very hard to keep Trump out of office and to steal this you know this election are the same people that participated in the 9-11 hoax. It was a psychological attack on America. Everything that happened that day was a psychological attack.”

ANSWER:

44. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for February 11-12, 2021 – 9/11 The Pentagon?

(See the Update for February 11-12, 2021 – 9/11 The Pentagon video posted to Rumble at approximately 2:37:45-2:47:50)

“Our country and our world has been controlled by this shadow government, the New World Order, Bilderberg Group, Deep State, Cabal, all the names that you can come up with. We've been corrupted by this group for hundreds of years. And 9-11 was just the most recent incident. 9-11 had many goals for the Cabal. It was a false flag, psychological attack on America, and it was for a specific reason, multiple reasons. Number one was to go to war. As we talked about in prior lives, every war in the history of man from World War II to World War I to all of them, the Iraq War, the central banks financed both sides of the wars. ...

All of the central banks are owned by the same owners.”

ANSWER:

45. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Update for February 11-12, 2021 – 9/11 The Pentagon?

(See the Update for February 11-12, 2021 – 9/11 The Pentagon video posted to Rumble at approximately 2:37:45-2:47:50)

“Back in this whole 9-11 thing, I was in high school and then I got involved in the documentary and people just weren't ready back then. I went around with DVDs and passed them out to family, to friends, and everybody thought I was crazy, just like everybody thinks you guys are crazy now, the whole election fraud thing. I wasn't crazy.”

ANSWER:

46. Do you admit that you signed a Waiver of Preliminary Hearing on or about September 27, 2010 with regard to your criminal case, CP-35-CR-2613-2010. (See ST 630 attached hereto.)

ANSWER:

47. Do you admit that you were ordered by the Court not to have contact with Brienna DuBorgel pursuant to your bail conditions established in July 2010 in connection with your criminal charges. (See ST 629 and ST 632 attached hereto.)

ANSWER:

48. Do you admit you signed the Guilty Plea Colloquy on November 12, 2010? (See ST 584-587 attached hereto.)

ANSWER:

49. Do you admit that you made the attached post shown as ST 3525 to one of your Telegram channels?

ANSWER:

50. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named Contest winners & AMA – October 10th, 2022?

George H.W. Bush and George W. Bush tortured children in the presence of mirrors to literally scared the children to death and produce adrenochrome in their brains and then George H.W. Bush and George W. Bush ate the children's brains.

ANSWER:

51. Do you admit that you made the following verbal statements in a video you posted to rumble.com/c/PhilGodlewski named The Primary - August 3rd, 2022?

The Supreme Court already over-turned the 2020 election. They just haven't announced it yet... And I know that to be a fact because I have the source, the only source that could possibly tell us such information. I have that source.

ANSWER:

52. Do you admit Miranda Polidori's date of birth is November 13, 1992?

ANSWER:

53. Do you admit you messaged Miranda Polidori in 2021 and included the following statement?

"I know you r in a relationship now and you are happy, or at least from what I can see. but if I'm wrong and that's not true, I'm still in love with you. I always have been and

probably always will be. what we both wanted back then is now realistic. and not just a fantasy future. I miss you every day and I have now for 2 years. if anything ever happens and I have the opportunity to get you back, that is an opportunity I would love to know about, love you miranda”

ANSWER:

54. Do you admit Miranda Polidori messaged you in 2021 in response to your message in No. 53 above and included the following statement?

“Phil you need to stop this. Please I’m begging you. Please stop messaging me. You and I were never real and never will be. I’m sorry that you feel that way but my feelings are not at all reciprocated and you need to let this go. Please move on and please please please leave me alone Phil. You can’t keep messaging me like This.”

ANSWER:

55. Do you admit Miranda Polidori then obtained a Temporary Protection from Abuse Order against you signed by Judge Corbett on June 14, 2021 prohibiting you from contacting Miranda Polidori, her boyfriend Ryan, her mother and her step-father? (See ST 340-346.)

ANSWER:

56. Do you admit that you did not contest Miranda Polidori's Petition for a Protection from Abuse Order?

ANSWER:

57. Do you admit that neither the Taylor Police nor the Lackawanna County District Attorney's office seized your cell phone (ph. 570-780-4557) and searched it in 2010 or 2011?

ANSWER:

58. Do you admit that you or your attorneys never provided any finger-print analysis report to the Lackawanna County District Attorney's office?

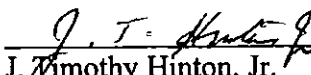
ANSWER:

59. Do you admit that you or your attorneys never provided any report or records concerning a forensic examination of your cell phone to the Lackawanna County District Attorney's office.

ANSWER:

Date: 5-15-23

Respectfully submitted:



J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
PA I.D. No. 61981
1401 Monroe Ave., Suite 2
Dunmore, PA 18509
Attorneys for Defendants,
Chris Kelly, Times Shamrock
Communications, The Scranton Times-
Tribune and Larry Holeva

PHILIP GODLEWSKI,	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	OF LACKAWANNA COUNTY
	:	
v.	:	CIVIL DIVISION
	:	
CHRIS KELLY, TIMES SHAMROCK	:	JURY TRIAL DEMANDED
COMMUNICATIONS, THE SCRANTON	:	
TIMES-TRIBUNE, LARRY HOLEVA	:	
Defendants.	:	No.: 2021-CV-2195

.....

CERTIFICATE OF SERVICE

I, **J. Timothy Hinton, Jr., Esquire**, certify that on this __ day of May 2023, I caused a true and correct copy of the foregoing Defendants' Requests Admission (Set VI) propounded upon Plaintiff to be served upon the following party by electronic mail:

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

Respectfully submitted:

Date: _____

 J. Timothy Hinton, Jr.
Haggerty Hinton & Cosgrove LLP
 PA I.D. No. 61981
 1401 Monroe Ave., Suite 2
 Dunmore, PA 18509
 Attorneys for Defendants,
 Chris Kelly, Times Shamrock
 Communications, The Scranton Times-
 Tribune and Larry Holeva