



3. Erred in finding that Plaintiff failed to present sufficient evidence of actual malice on the part of Defendants to survive summary judgment and proceed to trial.
- B. The Court erred in granting Defendants' Motion for Summary Judgment with respect to Plaintiff's claim for false light invasion of privacy for the same reasons the Court erred in granting summary judgment with respect to Plaintiff's defamation claims.

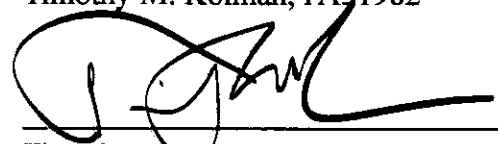
Respectfully submitted,

**KOLMAN LAW, PC**

DATE: October 18, 2024

/s/ Timothy M. Kolman

Timothy M. Kolman, PA51982



Timothy A. Bowers, PA77980



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**PROOF OF SERVICE**

I HEREBY CERTIFY that I am this day serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa.R.A.P.

121:

Personally and by Hand as Follows:

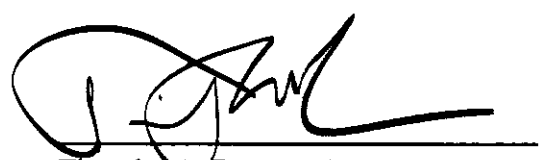
Hon. Terrence R. Nealon, J.  
570-963-6889  
Lackawanna County Courthouse  
200 N. Washington Avenue  
Scranton, PA 18503  
Common Pleas Judge  
Copy by email to [nealont@lackawannacounty.org](mailto:nealont@lackawannacounty.org)

By first class mail, postage prepaid as follows:

J. Timothy Hinton, Jr., Esquire  
Haggerty, Hinton & Cosgrove LLP  
Copy by email to [timhinton@haggertylaw.net](mailto:timhinton@haggertylaw.net)

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Dated: October 18, 2024



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