

FELLERMAN & CIARIMBOLI LAW, P.C.
183 Market Street
Suite 200
Kingston, PA 18704
(570) 714-4878
(570) 714-7255 (Fax)
www.fclawpc.com

MAURIS S. KELLY
LACKAWANNA COUNTY

2023 OCT 31 P 3:13

CLERK OF SUPERIOR
RECORDS & JUDICIAL DIVISION

Gregory E. Fellerman, Esquire
Attorney I.D. #81568
gef@fclawpc.com

Edward J. Ciarimboli, Esquire
Attorney I.D. #85904
ejc@fclawpc.com

Molly Dempsey Clark, Esquire
Attorney ID# 89367
mclark@fclawpc.com

PHILIP GODLEWSKI

PLAINTIFF,

V.

BRIENNA L. DUBORGEL

DEFENDANT.

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

CIVIL ACTION - LAW

JURY TRIAL DEMANDED

NO.: CV-2023-1354

**DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL
JUDGEMENT**

AND NOW COMES the Defendant, Brienna L. DuBorgel ("Defendant"), by and through her legal counsel, Fellerman and Ciarimboli Law PC, to hereby submit this Response to Plaintiff's Motion for Partial Judgement and in support thereof, avers as follows:

1-107. **DENIED.** Denied. The allegations set forth in Plaintiff's Motion for Partial Summary Judgement are conclusions of law to which no response is required. By way of further answer, and as set forth in Defendant's Brief in Opposition to be filed and incorporated fully herein, Defendant respectfully asks this Court to deny Plaintiff's Motion for Partial Summary Judgement in its entirety.

Respectfully submitted,

FELLERMAN & CIARIMBOLI LAW, PC

Molly Dempsey Clark

By: _____
EDWARD J. CIARIMBOLI, ESQUIRE
MOLLY DEMPSEY CLARK, ESQUIRE
Attorneys for the Defendant

Date: October 30, 2024

