COMMONWEALTH OF PENNSYLVANIA COURT OF JUDICIAL DISCIPLINE

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IN RE:

SEP 2 0 2019

Lyris F. Younge :

COURT OF JUDICIAL DISCIPLINE

OF PENNSYLVANIA

Court of Common Pleas

2 JD 2019

First Judicial District

Philadelphia County

JUDGE LYRIS F. YOUNGE'S ANSWER TO THE COMPLAINT OF THE JUDICIAL CONDUCT BOARD

- 1. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 7. Admitted
- 8. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 9. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 10. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 11. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 12. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 13. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 14. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 15. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 16. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 17. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 18. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 19. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 20. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 21. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 22. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial. By way of

- further response, the Superior Court erroneously sent correspondence to Judge John Milton Younge's chambers.
- 23. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 24. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 25. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 26. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 27. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 28. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 29. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 30. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 31. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 32. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 33. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 34. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 35. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 36. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 37. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 38. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 39. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 40. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 41. Admitted.
- 42. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 43. Admitted. By way of further response, Judge Younge relied on her staff to handle the administrative responsibilities associated with drafting opinions while she was sitting on the bench attempted to clear the backlog she inherited.

- 44. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 45. Admitted. By way of further response, Judge Younge relied on her staff to handle the administrative responsibilities associated with drafting opinions while she was sitting on the bench attempted to clear the backlog she inherited.
- 46. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 47. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 48. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 49. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 50. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 51. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 52. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 53. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 54. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 55. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 56. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 57. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 58. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 59. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 60. Denied as stated. Judge Younge was flabbergasted that her Order was disobeyed and, in an attempt, to protect a minor child addressed the social worker whose contemptuous behavior gave rise to a minor being injured.
- 61. Denied as stated. Judge Younge was flabbergasted that her Order was disobeyed and, in an attempt, to protect a minor child addressed the social worker whose contemptuous behavior gave rise to a minor being injured.
- 62. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 63. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 64. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.

- 65. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 66. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 67. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 68. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 69. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 70. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 71. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 72. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 73. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 74. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 75. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 76. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 77. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 78. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 79. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 80. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 81. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 82. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 83. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 84. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 85. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 86. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.

- 87. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 88. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 89. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 90. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 91. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 92. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 93. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 94. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 95. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 96. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 97. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 98. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 99. Denied. It is specifically denied that Judge Younge conducted herself with an improper demeanor.
- 100. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 101. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 102. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
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- 105. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 106. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 107. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 108. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 109. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
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- 113. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 114. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 115. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 116. The averments in this paragraph constitute a legal conclusion to which no response is required.
- 117. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 118. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 119. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 120. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 121. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 122. Admitted.
- 123. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 124. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
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- 131. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 132. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
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- 137. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
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- 142. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

- 143. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 144. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 145. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 146. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.
- 147. Denied. Judge Younge is without information sufficient to form a belief as to the veracity of this averment. Strict proof is demanded at the time of trial.

COUNT I

- 148. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 149. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 150. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 151. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 154. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 158. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT II

- 159. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 160. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 161. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 162. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 163. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT III

- 164. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 165. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 166. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 167. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 174. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 175. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 176. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 185. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 186. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 187. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 188. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 189. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 190. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 191. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT IV

- 192. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 193. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 194. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 195. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 196. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 197. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 207. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 208. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 209. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 210. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT V

- 211. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 212. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 213. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 214. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 215. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 216. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 218. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 219. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 224. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 225. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 226. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 227. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT VI

- 228. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 229. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 230. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 231. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 232. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 233. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 234. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 235. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT VII

- 236. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 237. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 238. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 239. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 240. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

- 241. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 245. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 246. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT VIII

- 247. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 248. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 249. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 250. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 251. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT IV

- 252. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 253. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 254. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 258. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 259. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
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- 261. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 262. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

COUNT X

- 263. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 264. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 265. The averments contained in this paragraph constitute a conclusion of law to which no response is required.
- 266. The averments contained in this paragraph constitute a conclusion of law to which no response is required.

WHEREFORE, it is respectfully requested that this Honorable Court grant Judge Younge the appropriate relief.

Respectfully submitted,

September 20, 2019,

Bv:

Charles M. Gibbs, Esquire
McMonagle, Perri, McHugh
Mischack & Davis, P.C.
PA Supreme Court ID# 310023
1845 Walnut Street, 19th Floor
Philadelphia, PA 19103
Attorneys for the Respondent

Clark Neflet

COMMONWEALTH OF PENNSYLVANIA COURT OF JUDICIAL DISCIPLINE

IN	P	$\mathbf{F}\cdot$

Lyris F. Younge Court of Common Pleas

First Judicial District

2 JD 2019

Philadelphia County

PROOF OF SERVICE

In compliance with Rule 122(D) of the Court of Judicial Discipline Rules of Procedure, on or about August 20, 2019, a copy of this Answer to the Complaint was sent by USPS

Overnight Delivery and via email to Elizabeth A. Flaherty, counsel for the Judicial Conduct

Board at the following address:

Ms. Elizabeth A. Flagherty, Esquire
Judicial Conduct Board
Pennsylvania Judicial Center
601 Commonwealth Avenue, Suite 3500
P.O. Box 62525
Harrisburg, PA 17106

Respectfully submitted,

Clark Neffeth

September 20, 2019

Attorneys for the Respondent