

<p>Gregory Stenstrom, Pro Se</p> <p>1541 Farmers Lane Glen Mills, PA 19342 856-264-5495 gregorystenstrom@gmail.com gstenstrom@xmail.net</p>	<p>Leah Hoopes, Pro Se</p> <p>241 Sulky Way Chadds Ford, PA 19317 610-608-3548 leahfreedelcopa@protonmail.com</p>
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**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY
PENNSYLVANIA (CIVIL DIVISION)**

JAMES SAVAGE,

Case No. **CV-2022-008511**

et al,

MOTION TO DISMISS and

Plaintiffs,

MOTION FOR SANCTIONS

v.

Note: Proposed Order attached last page

NEWSMAX MEDIA, INC.

et al,

NOTICE TO PLEAD: To Plaintiffs:
You are hereby notified to file a written response to Defendants within twenty (20) days from date of service hereof or a judgement may be entered against you. /s/ Gregory Stenstrom and Leah Hoopes

Defendants

**PRO SE DEFENDANT’S MOTION TO DISMISS AND
MOTION FOR SANCTIONS**

1. Pro Se Defendants Stenstrom and Hoopes submit this Motion to Dismiss and Motion for Sanctions for Plaintiffs’ failure to complete service and attend to their complaint pursuant to, and in accordance with, 231 Pa. Code §§ 401(a), § 401(b)(4) and § 404.

BRIEF IN SUPPORT OF MOTION TO DISMISS AND MOTION FOR SANCTIONS

2. Plaintiff’s attorney (J. Conor Corcoran) has not filed required *Praecepte to Reinstate* since August 31, 2023, **176 days ago**.
3. Plaintiffs have not completed proper service in the **470 days** since their original Writ of Summons naming multiple named Defendants, including Pro Se Defendants Gregory

Stenstrom and Leah Hoopes¹; and Defendants Regina Manidis, Margot Cleveland, and The Federalist; nor have Plaintiffs attended to their complaint.

4. J. Conor Corcoran, the attorney who originated the subject complaint on behalf of Plaintiffs Savage and Allen, has entered a Motion to Withdraw from two other nearly identical, frivolous defamation cases brought forward in the Philadelphia Court of Common Pleas, Case Numbers 211002495 and 230500012 that he has dragged out for **850 days** (Exhibit A).
5. Plaintiffs' attorney, J. Conor Corcoran, is the subject of serious complaints of misconduct, and disbarment, brought forward by the Pennsylvania Disciplinary Board that Corcoran has replicated in subject case, and defamation cases in Philadelphia. (Exhibit B).
6. Plaintiffs' attorney, J. Conor Corcoran, has stated he is closing his law practice in Pennsylvania (see also Exhibit A).
7. James Savage, the former Delaware County Voting Machine Warehouse Custodian, is Plaintiff in subject case in Delaware County (CV-2022-008511) and nearly identical cases on Philadelphia County, has collectively sued:
 - a. President Donald Trump
 - b. Former New York City Mayor Rudy Giuliani
 - c. Former State of Kansas Attorney General Phil Kline
 - d. The Thomas More Society
 - e. Attorney Jenna Ellis
 - f. Newsmax Media, Inc.
 - g. America First, Inc.
 - h. The Federalist
 - i. Attorney Margot Cleveland
 - j. Former White House Deputy Press Secretary Hogan Gidley
 - k. Newsmax Journalist Luca Cacciatore
 - l. Fox News Journalist Rob Schmitt
 - m. Gregory Stenstrom
 - n. Leah Hoopes
 - o. Regina Miller Manidis
8. Attorney J. Conor Corcoran solicited Plaintiffs, filed frivolous, conjectural complaints without any material facts, and failed to meet a majority of the most basic procedural requirements in accordance with Pa.R.C.P., or meet Case Management Order deadlines in his

¹ The December 20th, 2022, Affidavit of Service by Sheriff to Leah Hoopes is unsigned, vaguely states served "S/A," and she has not yet been properly served.

Philadelphia Court of Common Pleas action, or even perfect the subject case in the Delaware County Court of Common Pleas in violation of Pa.R.P.C. (See Exhibit C).

9. All documentation regarding the November 2020 election necessary for Plaintiffs to provide material facts to sustain their complaint have been unlawfully destroyed by Delaware County former Solicitor William F. Martin (see Exhibit D).
10. All documentation and public records regarding the November 2020 election necessary for Plaintiffs to sustain their complaint have been unlawfully withheld by current Delaware County Solicitors Robert Scott and Jonathan Liechenstein (see Exhibit E).
11. *American Bank & Trust Co. v. Ritter, Todd & Haayen*, 418 A.2d 408 (Pa.Super. 1980). Memory loss and the disappearance of witnesses and documents that prevent the reconstruction of a defense are prejudicial to defendants. *Jacobs v. Halloran*, 1710 A.2d 1098, 1102 (Pa. 1998).
12. Substantial diminution of a defendant's ability to present factual information in the event of a trial that has been brought about by plaintiff's delay is, likewise, prejudicial. *American Bank & Trust Co.*, 418 A.2d 4 at 410.
13. The Entry of Appearance by attorney John Rooney and Withdrawal by J. Conor Corcoran without explanation which is concurrent to Corcoran's currently contested withdrawal from the like frivolous Philadelphia Court of Common Pleas defamation case is an obvious contrivance to sustain the harassment of Defendants and abuse of the Honorable Court(s). (see Exhibit F)
14. Plaintiffs Savage and Allen, and their attorney, J. Conor Corcoran, filed these frivolous suits with the intent to harass and intimidate Pro Se Defendants Stenstrom and Hoopes, who are Plaintiffs in other active litigation against Savage and Allen, including *Stenstrom and Hoopes v. Secretary of the Commonwealth Boockvar, Allen, Savage, et al* (876 & 877 CD 2022 Commonwealth Court of Pennsylvania), which is scheduled to be heard in the April 8th, 2024 session of the Commonwealth Court, and are witnesses to election and criminal law violations committed by Savage and Allen.

REMEDY

15. Lawsuits are serious matters which both Plaintiffs and their licensed attorneys have a duty to diligently attend to, and not let languish with the intent of harassing and intimidating litigants as strategic leverage to alter the trajectories of lawsuits in other jurisdictions.
16. Plaintiffs' attorney J. Conor Corcoran has abused the Honorable Court for **470 days** in the subject case, and **850 days** in nearly identical defamation actions in Philadelphia Court of Common Pleas, without proper service, contemptuous disregard for any court ordered or statutory deadlines, and clear malicious intent to harass Defendants.
17. The abuse of the Honorable Court in this regard is a serious matter that only severe, punitive monetary sanctions can remedy, and also provide surface area for the Pennsylvania Disciplinary Board to further act on.
18. Plaintiffs and Plaintiffs' attorney Corcoran frivolous complaint(s) and callousness in attacking Pro Se Defendants Stenstrom and Hoopes has stolen their time and peace of mind, penalized them for fulfilling statutory duties as certified poll watchers, and caused them substantial emotional harm.
19. Wherefore, Pro Se Defendants Stenstrom and Hoopes request the Honorable Court grant the attached, proposed order.

Respectfully submitted,



LEAH HOOPES
241 Sulky Way
Chadds Ford, PA 19317
Telephone: 610-608-3548
leahfreedelcopa@protonmail.com
23FEB2023



GREGORY STENSTROM
1541 Farmers Lane
Glen Mills, PA, 19342
Telephone: 856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com
23FEB2023

VERIFICATION

We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Motion to Dismiss and Motion for Sanctions are true and correct to the best of our knowledge, information, and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



GREGORY STENSTROM
PRO SE



LEAH M. HOOPES
PRO SE

Dated: 23FEB2023

Pro Se Defendants Gregory Stenstrom and Leah Hoopes

Gregory Stenstrom, Pro Se
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com

Leah Hoopes, Pro Se
241 Sulky Way
Chadds Ford, PA 19317
610-608-3548
leahfreedelcopa@protonmail.com

**IN THE COURT OF COMMON PLEAS OF
DELAWARE COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE
Plaintiff,

v.

DONALD J. TRUMP,

et al,
Defendants

Case No. **CV-2022-008511**

MOTION TO DISMISS

MOTION FOR SANCTIONS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, they caused the foregoing Motion to Dismiss and Motion for Sanctions, to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Gregory Stenstrom and Leah Hoopes

Dated: 23FEB2023

**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE,

et al,

Plaintiffs,

v.

NEWSMAX MEDIA, INC.

et al,

Defendants

Case No. **CV-2022-008511**

MOTION TO DISMISS and

MOTION FOR SANCTIONS

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Defendant's Motion to Dismiss with Prejudice, and Motion for Sanctions, and any response thereto, it is hereby ORDERED and DECREED that said Motions are GRANTED.

Pro Se Defendants Stenstrom and Hoopes shall each be paid:

Fifty-thousand US dollars (\$50,000) _____ by Plaintiff Savage, and,

Fifty-thousand US dollars (\$50,000) _____ by Plaintiff Allen, and,

Fifty-thousand US dollars (\$50,000) _____ by Plaintiff's attorney J.

Conor Corcoran,

for a total of \$150,000 to each Pro Se Plaintiff Stenstrom and Hoopes, and total sanctions in the amount of \$300,000 _____.

BY THE COURT

EXHIBIT A

<p>Gregory Stenstrom, Pro Se</p> <p>1541 Farmers Lane Glen Mills, PA 19342 856-264-5495 gregorystenstrom@gmail.com gstenstrom@xmail.net</p>	<p>Leah Hoopes, Pro Se</p> <p>241 Sulky Way Chadds Ford, PA 19317 610-608-3548 leahfreedelcopa@protonmail.com</p>
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**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
PENNSYLVANIA (CIVIL DIVISION)**

JAMES SAVAGE

Plaintiff,

v.

DONALD J. TRUMP, et al,

Defendants

CASE ID NO.: 211002495

**OBJECTION TO MOTION TO
WITHDRAW**

**MOTION FOR SUMMARY
JUDGEMENT**

MOTION FOR SANCTIONS

**DEFENDANTS' ANSWER AND OBJECTON TO PLAINTIFF ATTORNEY
CORCORAN'S MOTION TO WITHDRAW AND 90-DAY STAY**

1. Pro Se Defendants Stenstrom and Hoopes file this objection to Plaintiff's attorney Corcoran's Motion to Withdraw as counsel, and his proposed 90-day stay, and request leave to present their pending Motion for Summary Judgement in their favor, and Motion for Sanctions, at the Rule to Show Cause hearing scheduled for January 29th, 2024.
2. Pro Se Defendants Stenstrom's and Hoopes' (second) Motion for Summary Judgement (Control No. 23100135) was previously denied by the Honorable Court without prejudice pending closure of discovery, and remains ripe for reconsideration.
3. Plaintiff Savage and his attorney J. Conor Corcoran once again come with empty and unclean hands in response to, yet another Court ordered discovery deadline (the fourth (4) discovery deadline they have ignored), more than 850 days after filing their frivolous case.
4. Pro Se Defendants Stenstrom and Hoopes hold that their pending Motion for Summary Judgement (Control No. 23100135); pending Motion for Sanctions (Control No. 24023354); Motion to Show Cause that Plaintiff Savage is a public official (Control No.

24016200); and ruling on objections by Plaintiff to Pro Se Defendants proposed subpoenas are all ripe for consideration by the Honorable Court and request the Honorable Judge Erdos grant the attached proposed order, as such, in Defendants' favor.

5. Plaintiff's attorney J. Conor Corcoran comes forward to withdraw as counsel for 1.) Undisclosed and unsubstantiated "irreconcilable differences," 2.) "Personal problems," and, 3.) stating he is purportedly "closing his law practice in Pennsylvania."
6. As Pro Se Defendants Stenstrom and Hoopes substantiate in their motions, the only "irreconcilable difference" that Plaintiff Savage and attorney Corcoran have is that they forgot to bring a case, and abused both the Honorable Court and Defendants.
7. Corcoran's documented "personal problems" are a \$113,000+ federal tax lien, pending Commonwealth disciplinary hearings for his disbarment for misconduct that he has replicated throughout the trajectory of this case, and pending sanctions requested by Defendants, that if granted make the closure of his "practice" a foregone conclusion.
8. Pro Se Defendants Stenstrom and Hoopes have complained of misconduct by attorney J. Conor Corcoran in their Motion to Dismiss, Motion to Strike, two separate Motions for Summary Judgement, Motions to Compel, Motion for Sanctions, and related Praecipes, over an excruciating, almost three-year period, where Corcoran filed non-responsive, frivolous administrative motions only hours before court ordered deadlines, with empty hands, provably false averments, and vague "personal problems."
9. Plaintiff Savage has not appeared in any of the previous three hearings since June 2023, and the brief string of almost entirely redacted text messages attorney Corcoran submitted in support of his motion to withdraw, appear to show Savage is a resident of an assisted living or nursing care facility, and has not been in regular communications with counsel Corcoran.
10. The text messages and emails provided by Corcoran also show that both he and Plaintiff Savage were aware of disciplinary charges for disbarment filed by the Pennsylvania Disciplinary Council that were made known to Corcoran in December 2023. Corcoran plainly states in his text messages and email that these communications have "nothing to do" with the subject case, are related to the disciplinary action, and as such are not protected communications that they should be prepared to disclose in full at the subject Rule to Show Cause hearing.

11. Corcoran's almost completely redacted correspondence indicates collaboration with other litigative parties that appear to include licensed attorneys, from which it is reasonable to conclude that Corcoran's proposed withdrawal and stay are strategic and a matter of collusion to continue to harass and wage "lawfare" on Defendants.

REMEDY

12. Plaintiff Savage and his attorney J. Conor Corcoran filed their defamation suit against President Donald Trump, New York City Mayor Rudy Giuliani, Kansas Attorney General Phil Kline, attorney Jenna Ellis, The Thomas More Society, and Gregory Stenstrom and Leah Hoopes who were fulfilling statutory duties on behalf of candidates in the November 2020 election in their instant complaints of November 1st, 2021, and April 28th, 2023, on a Friday evening at 11:28pm with the assistance of head Discovery Court Clerk Peter Divon only hours before the close of discovery, in the venue of the Philadelphia Court of Common Pleas and almost identical action on November 11th, 2022, in the Delaware County (PA) Court of Common Pleas (CV-2022-008511), with entirely conjectural claims of defamation against Savage.

13. Plaintiff Savage and Plaintiff's attorney Corcoran have not filed Praecipe to reinstate their case in Delaware County in eight (8) months, nor even served Pro Se Defendants Stenstrom, Hoopes, or Regina Miller, in what is clearly another harassing action.

14. Attorney Corcoran has filed these multiple \$1,000,000 lawsuits on Plaintiff Savage's behalf in Philadelphia and Delaware County, PA, and per his standard contingency fee of 30% noted in his disciplinary hearing response, purports to this Honorable Court that he is voluntarily "walking away" from \$600,000+ plus in potential legal fees.

15. Considering the outrageous lengths Corcoran went to attack his own client and attorneys in the Siderio case, which he has sworn and admitted to, and are the subject of his pending disciplinary action, and his documented financial troubles, it is disingenuous that Corcoran would take a lesser pecuniary interest in the subject cases before the Honorable Court.

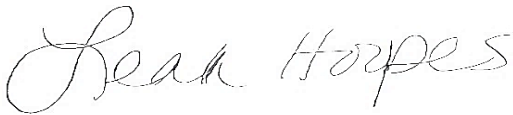
16. During the January 10th, 2024, Rule to Show Cause hearing, attorney Corcoran swore he had no medical records, as discussed in the pending Motion for Sanctions, when, in fact, they were absolutely in his possessions since November 29th, 2023, and which are incredibly damning and defeating to Plaintiff's case as declarations against Plaintiff's interest, and also further impeach his sole expert witness, whose cited expertise is PTSD, and for which no other relevant medical records have been produced.

17. Plaintiff Savage was clearly a public official as the sole statutory custodian of all election related machines and voting materials stored in a county voting machine warehouse for one of the largest counties in the Commonwealth of Pennsylvania with almost 600,000 residents. These election machines and storage facilities are designated as part of critical national infrastructure by the US Department of Homeland Security. (see <https://www.dhs.gov/topics/election-security>).
18. Plaintiff Savage was also simultaneously a public figure by all statutory definitions, as the President of the Philadelphia US Steel Workers union, a 890,000 member national union, previous to his inexplicable abbreviated stint of employment as the Delaware County (PA) Voting Machine Warehouse Custodian, and he immediately returned to the employ of the national US Steel Workers union as a lobbyist subsequent to his resigning from Delaware County's employ.
19. Plaintiff's sole piece of evidence submitted during the 850-day trajectory of the subject cases is a photograph for which Plaintiff's attorney has refused to provide metadata and has objected to subpoena by Pro Se Defendants to verify its provenance.
20. Attorney Corcoran has demonstrated gross misconduct, continued perpetrations of fraud upon the Honorable Court, and waited 40-days from the January 10th, 2024, Rule to Show Cause hearing, until after Pro Se Defendants filed their Motion to Compel, Motion for Sanctions, Motion to Show Cause, and disciplinary charges against Corcoran were made public.
21. Attorney Corcoran's not so sudden decision to "withdraw" from the subject cases and close his law practice in the face of a \$113,000 federal tax lien, disciplinary hearing for disbarment, and \$200,000 in proposed sanctions should not be permitted by the Honorable Court.
22. The bottom line in the subject cases is that Plaintiff Savage did everything that Pro Se Defendants Stenstrom and Hoopes alleged and documented, and not a single material fact that Plaintiff has (not) entered as evidence before the Honorable Court, has disputed or refuted Pro Se Defendants "truth is a complete defense" affirmative defense.
23. Attorney Corcoran has used his license to practice law to sadistically torment whomever he targets to extort monies from. Corcoran directly jeopardized the lives, liberty, and property of Pro Se Defendants Stenstrom and Hoopes with reckless disregard, and laughed, giggled, and visibly enjoyed perpetrating fraud and abusing the Honorable Court.

24. Now, attorney Corcoran proposes to exit the frivolous cases he fomented and inflicted, having wreaked havoc upon Pro Se Defendant's Stenstrom and Hoopes lives.

25. Wherefore, Pro Se Defendants Stenstrom and Hoopes request the Honorable Court hear the aforementioned motions at the February 29th, 2024, Rule to Show Cause hearing, and grant the attached proposed Order.

Respectfully submitted,



LEAH HOOPES
241 Sulky Way
Chadds Ford, PA 19317
Telephone: 610-608-3548
leahfreedelcopa@protonmail.com
22FEB2023



GREGORY STENSTROM
1541 Farmers Lane
Glen Mills, PA, 19342
Telephone: 856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com
22FEB2023

VERIFICATION

We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Objection to Plaintiff's attorney Motion to Withdraw are true and correct to the best of our knowledge, information, and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



GREGORY STENSTROM
PRO SE



LEAH M. HOOPES
PRO SE

Dated: 22FEB2023

Pro Se Defendants Gregory Stenstrom and Leah Hoopes

Gregory Stenstrom, Pro Se
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com

Leah Hoopes, Pro Se
241 Sulky Way
Chadds Ford, PA 19317
610-608-3548
leahfreedelcopa@protonmail.com

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE
Plaintiff,

v.

DONALD J. TRUMP,

et al,
Defendants

CASE ID NO.: 211002495

**PRO SE DEFENDANTS' ANSWER
AND OBJECTION TO
PLAINTIFF'S MOTION TO
WITHDRAW**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, they caused the foregoing Objection to Motion to Withdraw, to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Gregory Stenstrom and Leah Hoopes

Dated: 22FEB2023

**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE

CASE ID NO.: 211002495

Plaintiff,

v.

DONALD J. TRUMP, et al,

Défendants.

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Defendant’s Motion for Extraordinary Relief, and any response thereto, it is hereby ORDERED and DECREED that:

1. Plaintiff’s attorney’s MOTION TO WITHDRAW is DENIED with prejudice.
2. Plaintiff’s attorney proposal for a 90-day stay in proceedings is DENIED with prejudice.
3. Motion for Summary Judgement (Control No. 23100135) is GRANTED in favor of Pro Se Defendants, and their defense that “*truth is a complete defense*” is AFFIRMED.
4. Motion for Sanctions against Plaintiff and his Attorney in the amount of \$200,000 _____ each to Pro Se Defendants is GRANTED.
5. Additional punitive Sanctions in the amount of \$1,000,000 _____ each be levied on Plaintiff and Plaintiff’s attorney as remedy for gross misconduct and abuse of court to Pro Se Defendants, is GRANTED.
6. Plaintiff Savage is a “public official” and “public figure.”

BY THE COURT

James Savage,

Plaintiff,

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

OCTOBER TERM, 2021
No. 2495

v.

Donald J. Trump, et. al.,

Defendants.

RULE TO SHOW CAUSE: PETITION TO WITHDRAW AS COUNSEL

TO THE PROTHONOTARY:

Counsel for Plaintiff James Savage requests that a Rule to Show Cause be issued as to why Counsel's Petition to Withdraw as Counsel should not be granted.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.



J. CONOR CORCORAN
Attorney for Plaintiff

Dated: February 19, 2024

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

ORDER

AND NOW, this day of , 2024, upon consideration of Plaintiff James Savage's counsel's Petition to Withdraw, and any Answer thereto, it is hereby ORDERED that said Petition is GRANTED.

J. Conor Corcoran, Esquire, and the Law Office of J. Conor Corcoran, P.C., are granted leave to withdraw as counsel for Plaintiff James Savage.

This matter will be stayed for ninety (90) days from the date of this Order, to allow Plaintiff the opportunity to find new counsel.

BY THE COURT:

J.

Case ID: 211002495
Control No.: 24024094

LAW OFFICE OF J. CONOR CORCORAN, P.C.
J. Conor Corcoran, Esquire
Identification No. 89111
2601 Pennsylvania Avenue
Suite 501
Philadelphia, PA 19130
T: (215) 735-1135
F: (215) 735-1175
E: conor@jccesq.com

Attorney for Plaintiff
James Savage

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

Petition to Withdraw as Counsel

Counsel for Plaintiff James Savage, the Law Office of J. Conor Corcoran, P.C., hereby avers the following with regard to its Petition to Withdraw:

1. Counsel for the Plaintiff filed the Complaint in the above captioned matter on November 1, 2021, and has been Plaintiff's counsel throughout all subsequent and extensive pleading, discovery, and motion practice since then.
2. Undersigned counsel and the Plaintiff have irreconcilable differences with regard to the instant action; namely, a private dispute has arisen between Counsel and the Plaintiff concerning litigation strategies, undersigned counsel's need to withdraw as counsel for the Plaintiff due to conflicting personal and family matters, undersigned counsel's intention to close his law practice later this year, and Plaintiff's desire for new counsel to litigate the above captioned matter on his behalf.
3. Counsel for the Plaintiff has notified the Plaintiff of the intention to withdraw as counsel pursuant to Pa.R.C.P. 1012(d)(1). Plaintiff was informed as such by telephone on January 7 and 11, 2024; text on January 6 and 7 and 9, and February 18, 2024; and email on February 5 and 7 and 17,

2024, true and correct copies of which are attached hereto and incorporated herein as Exhibit A, and notification is provided by virtue of this filing, which shall be contemporaneously sent to the Plaintiff's personal email address.

4. The Plaintiff has thereby been informed that he should retain a new attorney as soon as possible, and the Plaintiff has clearly indicated to undersigned counsel that he wishes to retain new counsel and continue with the litigation of the above captioned matter.

5. As of the date of hearing on this Petition, the Plaintiff has yet to retain new counsel, despite multiple recommendations to do so, as aforementioned.

WHEREFORE, Counsel for Plaintiff respectfully requests that this Honorable Court enter the attached Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.



J. CONOR CORCORAN
Attorney for Plaintiff

Dated: February 19, 2024

LAW OFFICE OF J. CONOR CORCORAN, P.C.
J. Conor Corcoran, Esquire
Identification No. 89111
2601 Pennsylvania Avenue
Suite 501
Philadelphia, PA 19130
T: (215) 735-1135
F: (215) 735-1175
E: conor@jccesq.com

Attorney for Plaintiff
James Savage

James Savage,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

Plaintiff,

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S PETITION
FOR WITHDRAWAL AS COUNSEL**

Counsel for Plaintiff James Savage, the Law Office of J. Conor Corcoran, P.C., hereby avers the following with regard to its Petition to Withdraw.

I. Matter Before the Court

Plaintiff's counsel's Petition to Withdraw.

II. Statement of Questions Presented

Should the Petition be granted? Suggested Answer: Yes.

III. Facts

Counsel for the Plaintiff filed the Complaint in the above captioned matter on November 1, 2021, and has been Plaintiff's counsel throughout all the subsequent and extensive pleading, discovery, and motion practice since then.

Undersigned counsel and the Plaintiff have irreconcilable differences with regard to the instant action; namely, a private dispute has arisen between Counsel and the Plaintiff concerning

litigation strategies, undersigned counsel's need to withdraw as counsel for the Plaintiff due to conflicting personal and family matters, undersigned counsel's intention to close his law practice later this year, and Plaintiff's desire for new counsel to litigate the above captioned matter on his behalf.

Counsel for the Plaintiff has notified the Plaintiff of the intention to withdraw as counsel pursuant to Pa.R.C.P. 1012(d)(1). Plaintiff was informed as such by telephone on January 7 and 11, 2024; text on January 6 and 7 and 9, and February 18, 2024; and email on February 5 and 7 and 17, 2024, true and correct copies of which are attached hereto and incorporated herein as Exhibit A, and notification is provided by virtue of this filing, which shall be contemporaneously sent to the Plaintiff's personal email address.

The Plaintiff has thereby been informed that he should retain a new attorney as soon as possible, and the Plaintiff has clearly indicated to undersigned counsel that he wishes to retain new counsel and continue with the litigation of the above captioned matter.

As of the date of hearing on this Petition, the Plaintiff has yet to retain new counsel, despite multiple recommendations to do so, as aforementioned.

IV. Argument

In accordance with Pa.R.C.P. 1012 (c) and (d)(1), leave of court to withdraw an appearance shall be sought by petition, which shall be served on all parties pursuant to Pa.R.C.P. 440.

Counsel for the Plaintiff has notified the Plaintiff of the intention to withdraw as counsel pursuant to Pa.R.C.P. 1012(d)(1). Plaintiff was informed as such by text on January 6 and 7 and 9, 2024; telephone on January 7 and 11, 2024, and February 18, 2024; and email on February 5 and 7 and 17, 2024, true and correct copies of which are attached hereto and incorporated herein as Exhibit A, and by virtue of this filing, which shall be contemporaneously sent to the Plaintiff's personal email address.

As of the date of hearing on this Petition, Plaintiff has yet to retain new counsel, despite multiple recommendations to do so, as aforementioned.

V. Conclusion

Counsel for the Plaintiff respectfully requests, based on the foregoing, that the Court enter the attached Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Dated: February 19, 2024



J. CONOR CORCORAN
Attorney for Plaintiff

LAW OFFICE OF J. CONOR CORCORAN, P.C.
J. Conor Corcoran, Esquire
Identification No. 89111
2601 Pennsylvania Avenue
Suite 501
Philadelphia, PA 19130
T: (215) 735-1135
F: (215) 735-1175
E: conor@jccesq.com

Attorney for Plaintiff
James Savage

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

CERTIFICATE OF SERVICE

I, J. Conor Corcoran, Esquire, hereby certify that a true and correct copy of the foregoing Plaintiff's Petition to Withdraw with Memo of Law was sent to the following as indicated:

Leah Hoopes, pro se
Gregory Stenstrom, pro se
Michael Madaio, Esq. (Attorney for Trump Defendants)
VIA EMAIL AND COURT E-FILING SYSTEM

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Dated: February 19, 2024



J. CONOR CORCORAN
Attorney for Plaintiff

FILED

19 FEB 2024 04:12 pm

Civil Administration

T. BARRETT

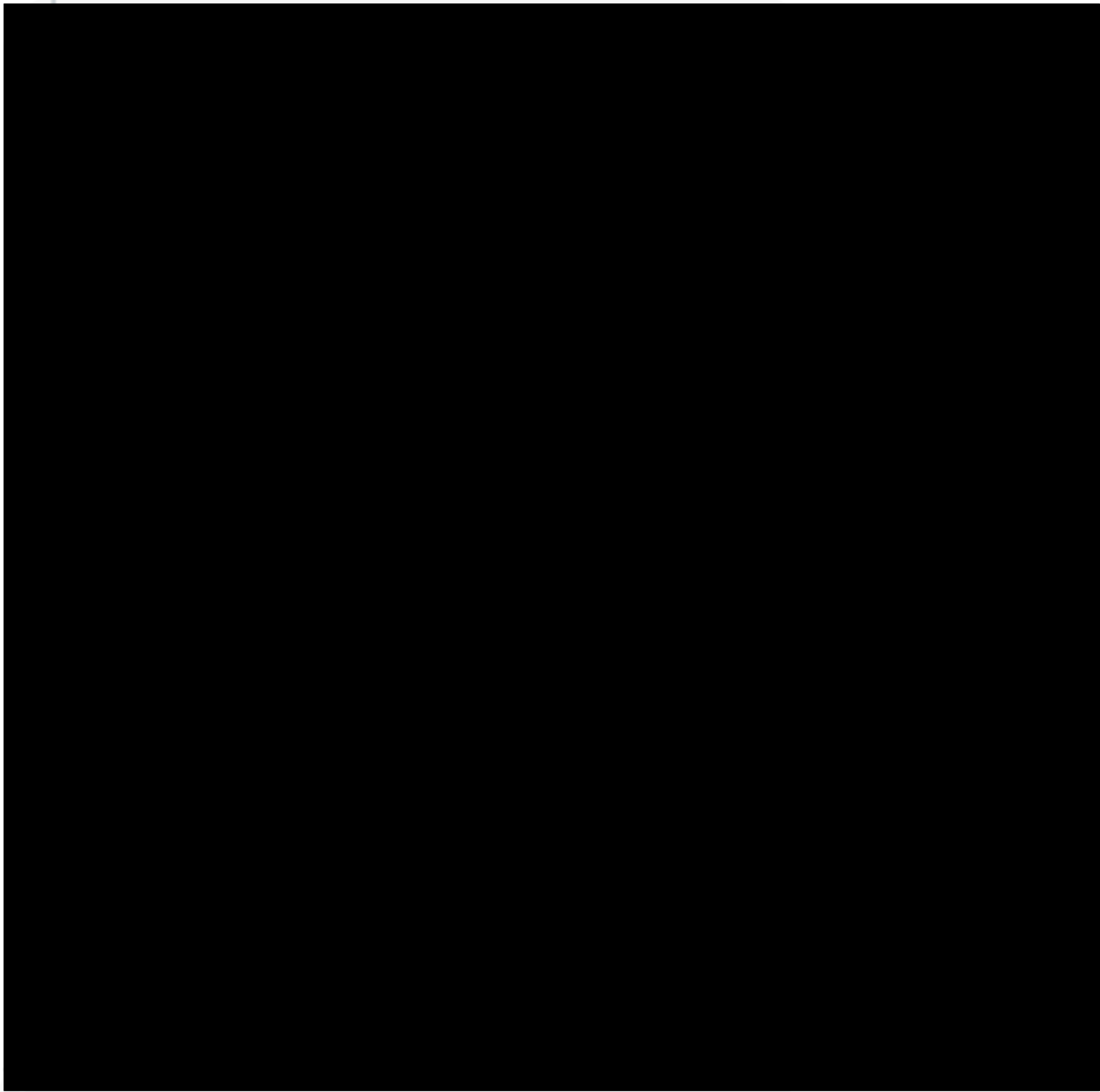
EXHIBIT A



Jim >

Sat, Jan 6 at 2:29 PM

The birther is a racist? Shocked



Not surprising at all.

You around tomorrow? I'd like to talk about the cases, where they stand, and where we go from here.

Do we need to talk before the hearing on Tuesday? What is the expectation for it?



Text Message



< 15



Jim >

Do we need to talk before the hearing on Tuesday? What is the expectation for it?

I'm available at 9am, 11am, or after 4pm

Alright. I'll try and call at 9 am.

Tuesday is a discovery hearing day. [REDACTED]

Anyway, Tuesday is not the reason for the call. We have to talk about [REDACTED]

I also have some personal family troubles that I have to talk with you about, because they've come to a head over the past month, and



Text Message



< 15



Jim >

I also have some personal family troubles that I have to talk with you about, because they've come to a head over the past month, and they're will affect my ability to continue on this case as your sole counsel.

It's time to start thinking about new lead counsel, and it may be time for me to back out altogether.

[Redacted]

Alright, I'll sort that out before our call.

[Redacted]



Text Message



< 15



Jim >

[Redacted]

Well I would never recommend being without counsel, that's for sure.

[Redacted]

A very long way. I'll explain tomorrow.

[Redacted]



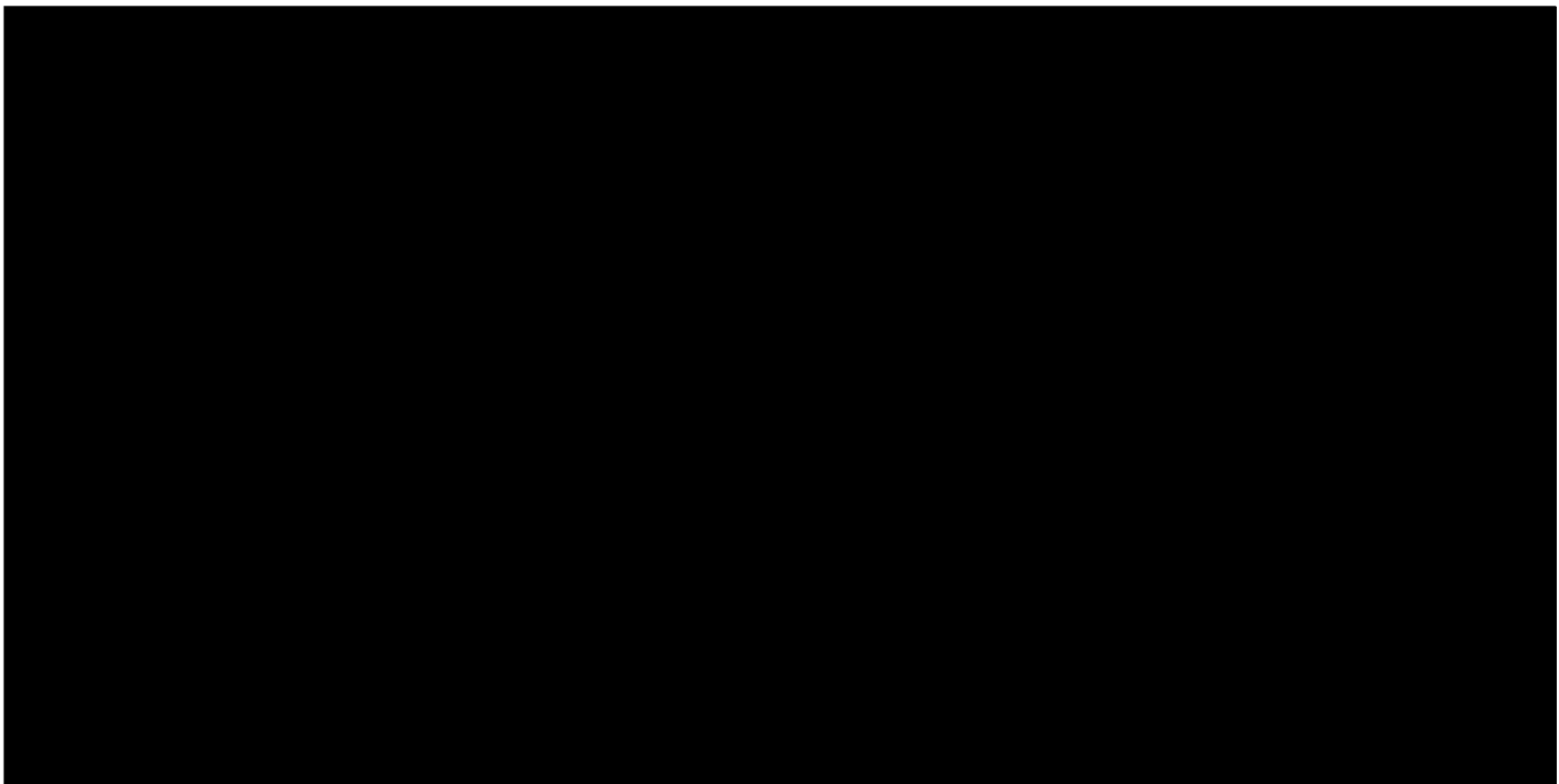
Text Message





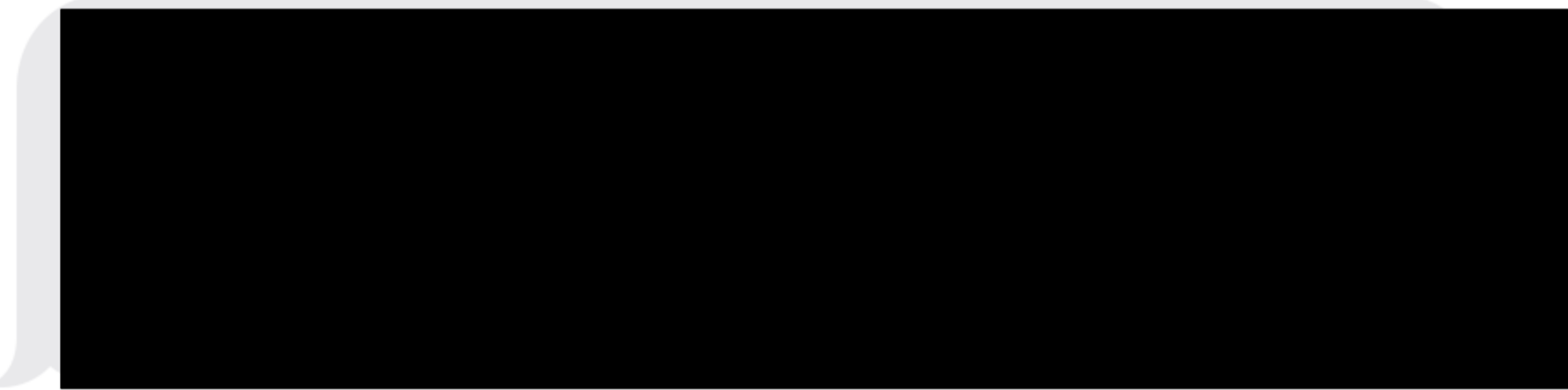
Jim >

A very long way. I'll explain tomorrow.



... happy to let you quit if that's what you need to do, but I'm going to have questions

It has nothing to do with the case. It's about some family troubles that will require me to step away from my entire practice.



Text Message





Jim >

[Redacted]

[Redacted]

[Redacted]

[Redacted]... happy to discuss tomorrow why you're backing off of this...

Sun, Jan 7 at 3:50 PM

Hello... I've been on the phone all day trying to get in front of this situation... a request and a question... [Redacted]

[Redacted]



Text Message

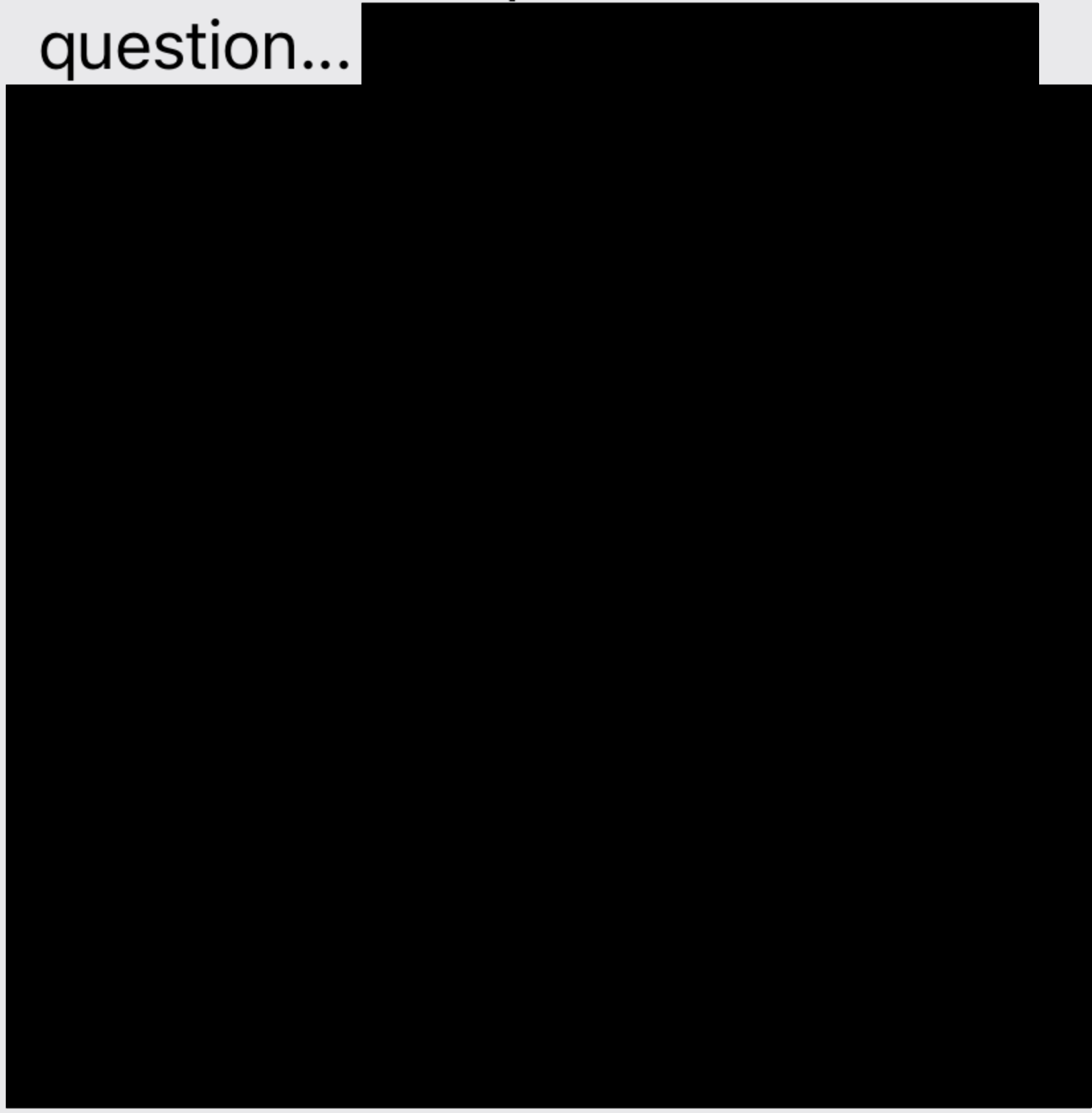


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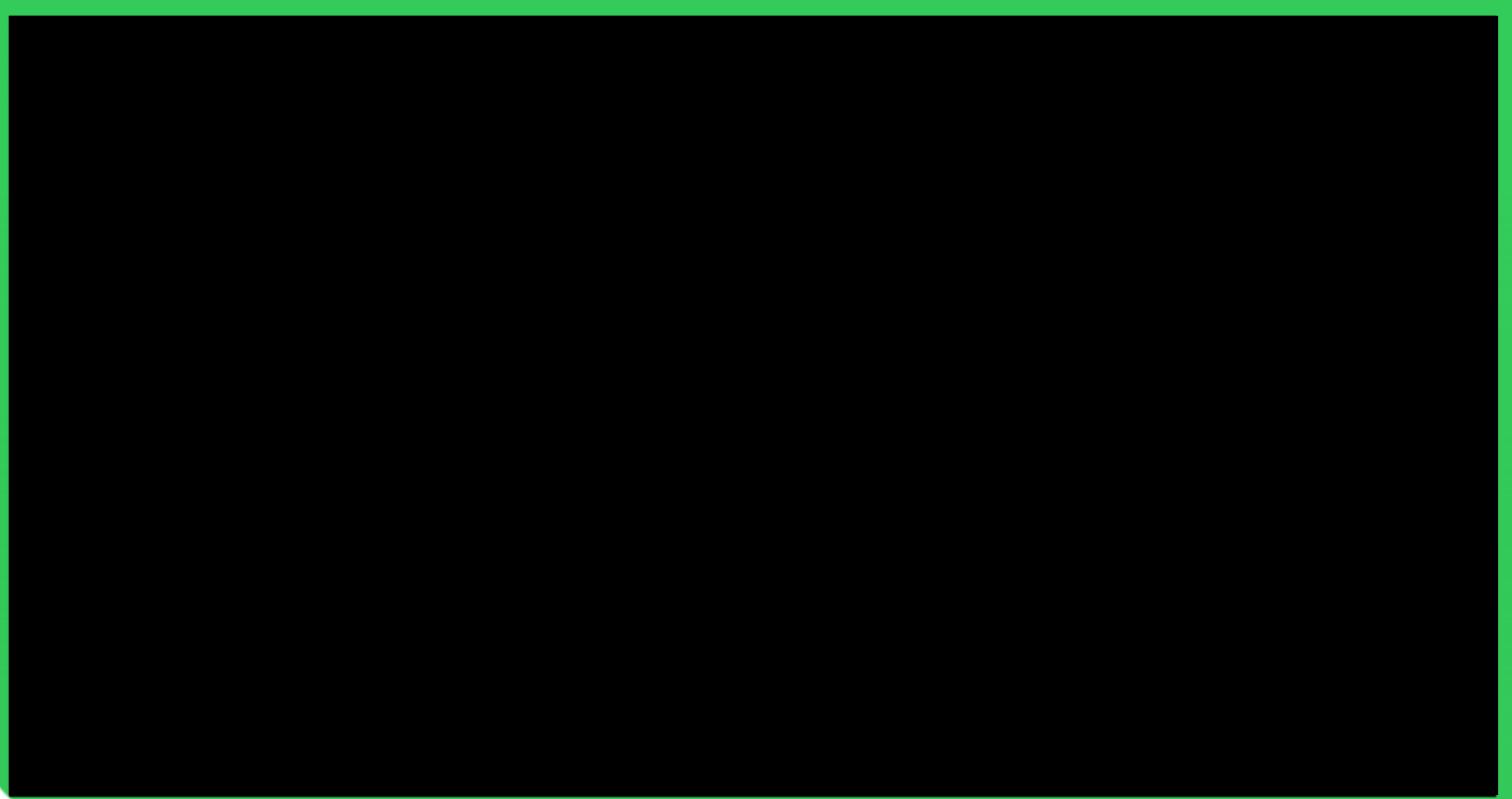
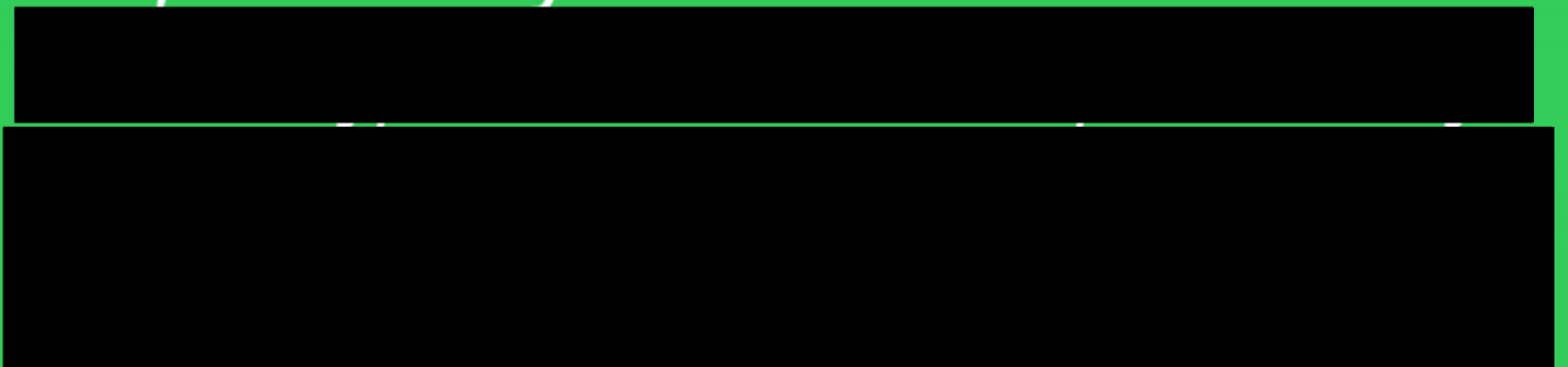


Jim >

day trying to get in front of this situation... a request and a question...



So, I already reached out to



Text Message



< 15



Jim >

Ok, thanks... please keep me updated

I will.

I have some additional names for you:



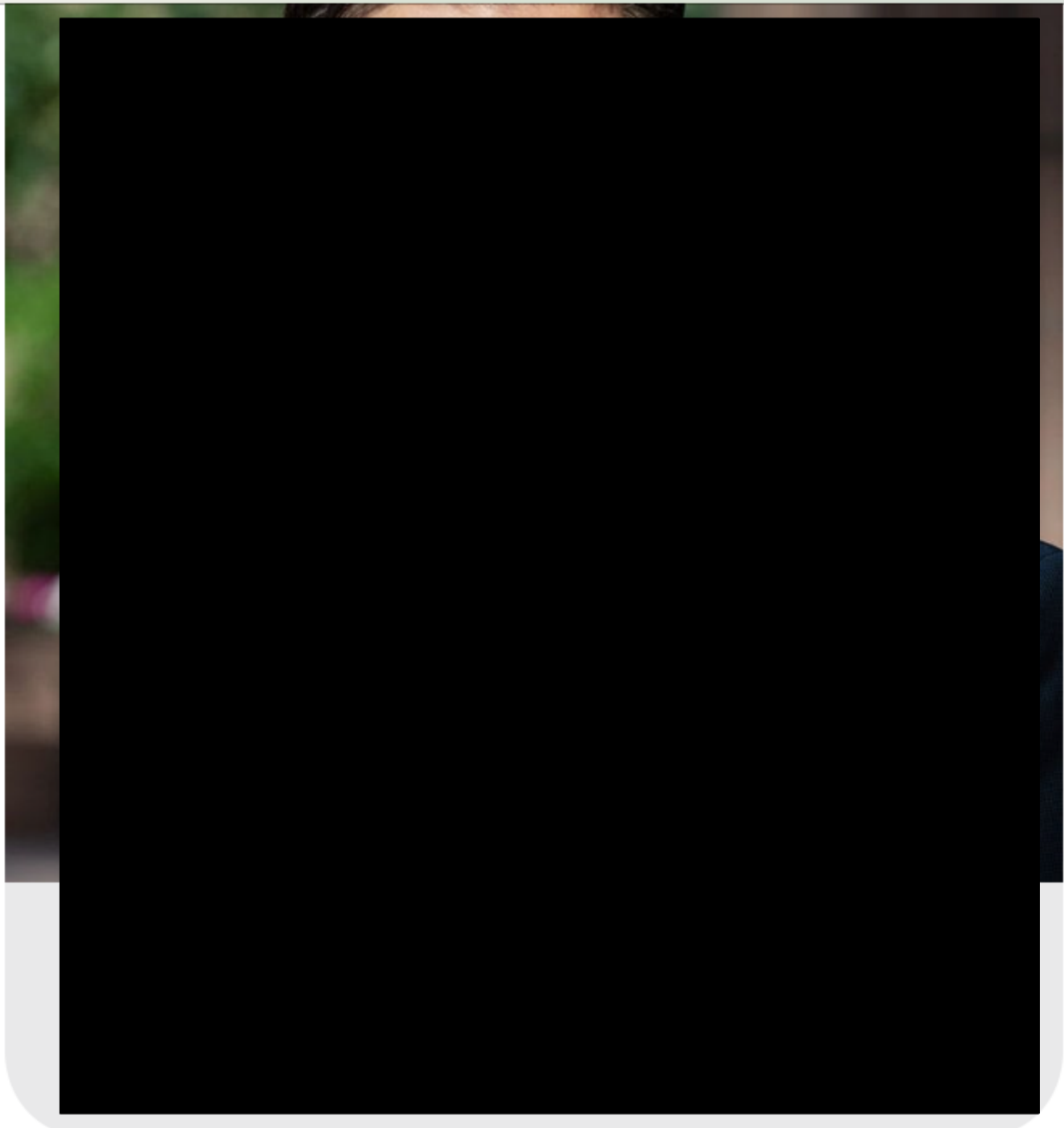
Text Message



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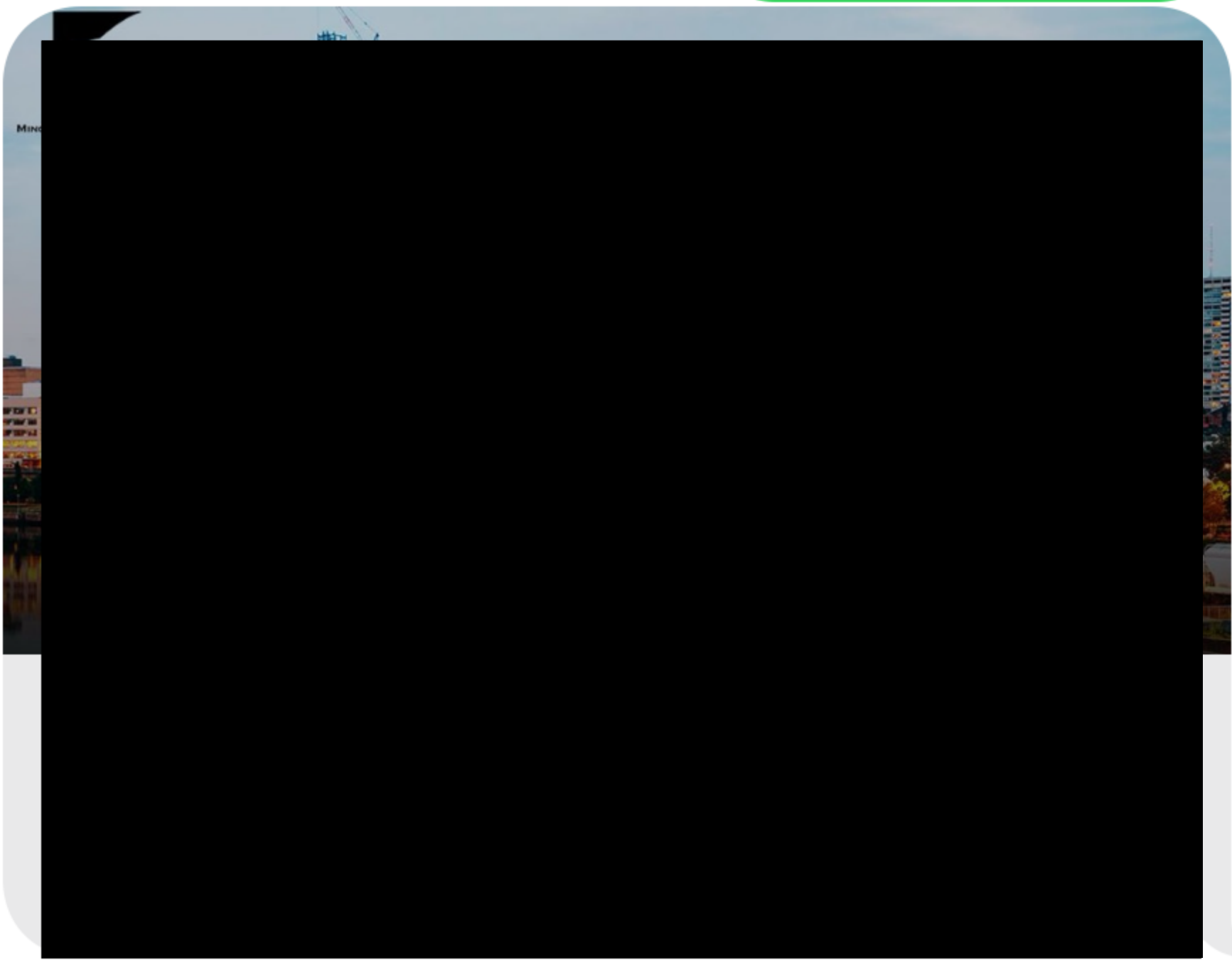


Jim >



Start with [redacted]

[redacted]



I'm starting with my network...
[redacted]



Text Message



< 15



Jim >

I'm starting with my network...

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Tue, Jan 9 at 9:17 AM

[Redacted]



Text Message



< 15



Jim >

[Redacted incoming message]

[Redacted outgoing message]

Tue, Jan 9 at 9:17 AM

[Redacted incoming message]

No problem. Today and tomorrow are no good, but Thursday and Friday are pretty good for a call.
[Redacted]

Thanks

[Redacted outgoing message]



Text Message



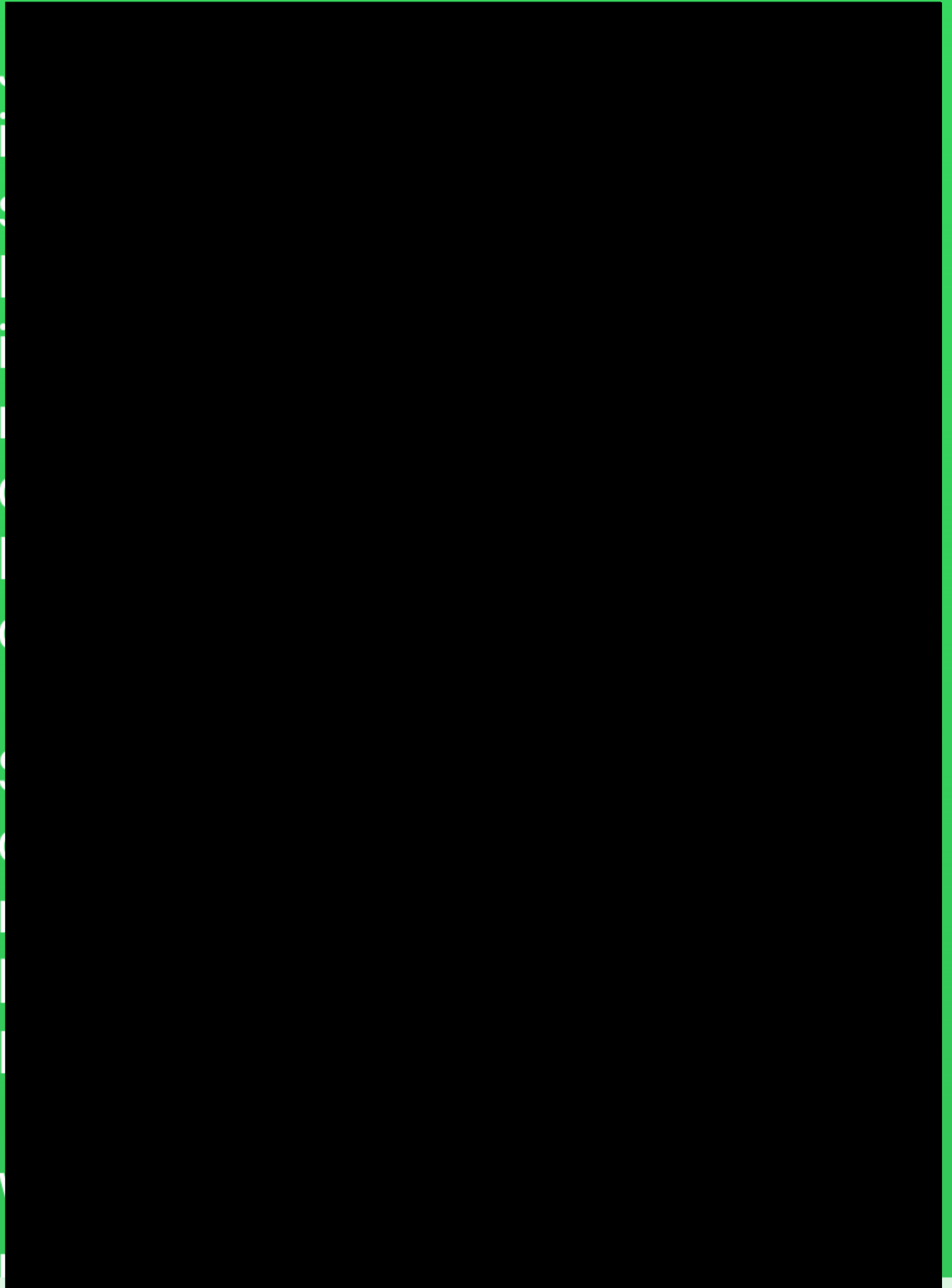


Jim >



Wed, Jan 10 at 11:07 AM

In court right now on a break, and can't talk.



Text Message



Re: External: Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

From: Conor Corcoran (conor@jccesq.com)

To: [REDACTED]

Date: Wednesday, February 7, 2024 at 01:19 PM EST

Hi Jim:

Yes, I saw that article as well. [REDACTED] While it does not have anything to do with your case, it is one of many reasons why I will be closing my law practice this year.

In the meantime, I will work to protect your interests in your matters, until such time as you retain new counsel, or the Court grants a Motion to Withdraw.

Sincerely Yours,
Conor

Law Office of J. Conor Corcoran, P.C.
2601 Pennsylvania Avenue
Suite 501
Philadelphia, Pennsylvania 19130

T: (215) 735-1135
F: (215) 735-1175
E: conor@jccesq.com

<http://www.jccesq.com>

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On Tuesday, February 6, 2024 at 06:03:37 PM EST, Savage, James [REDACTED]

From: Conor Corcoran <conor@jccesq.com>
Sent: Monday, February 5, 2024 3:06:01 PM

Case ID: 211002495
Control No.: 24024094

To: James Savage [REDACTED]

Subject: External: Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

[REDACTED]

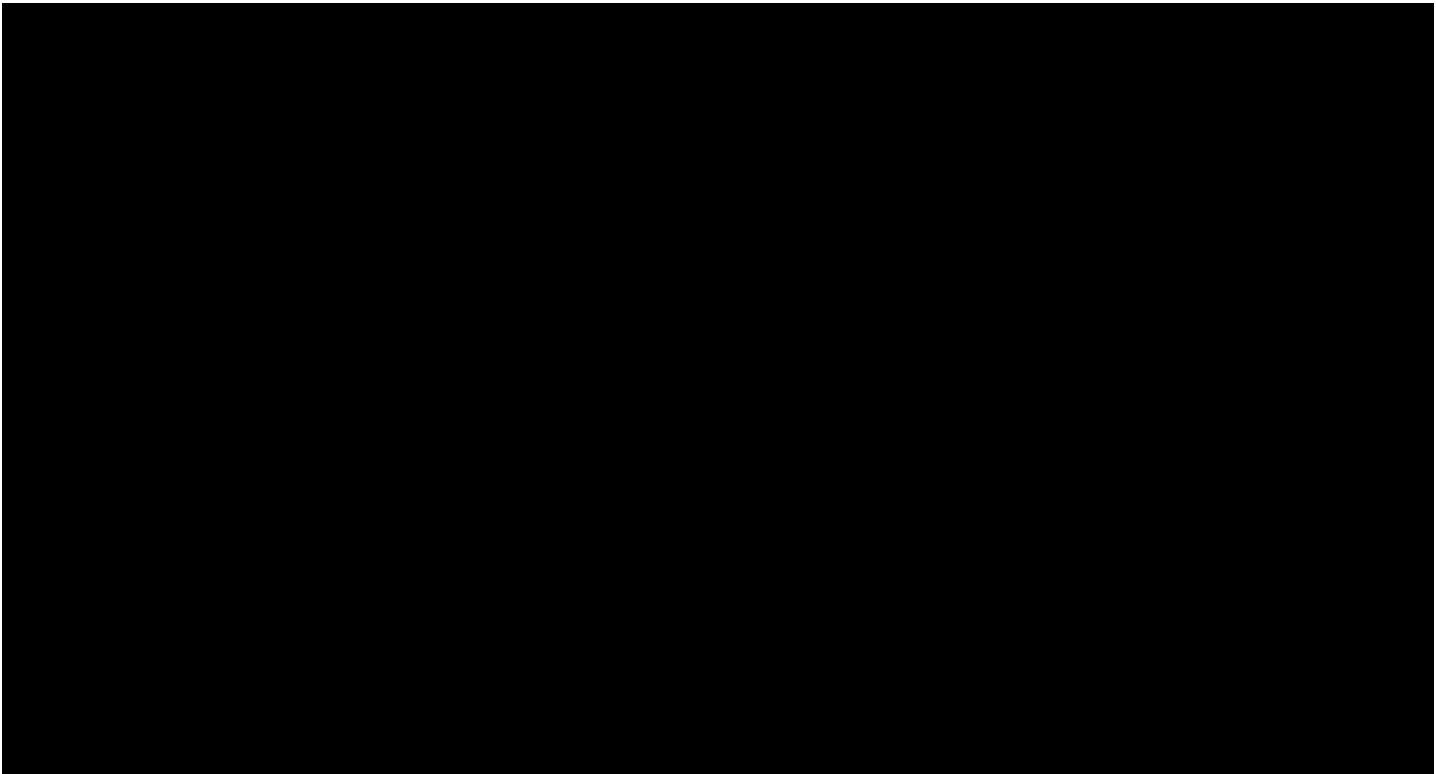
Dear Jim:

As you will recall, on January 7, 2024, I telephoned you about my decision to eventually withdraw as your counsel in the above captioned matter, as I will be closing my law practice this year. This was a decision largely borne by a conflict that has arisen due to my overwhelming interest in certain family and personal matters, [REDACTED]

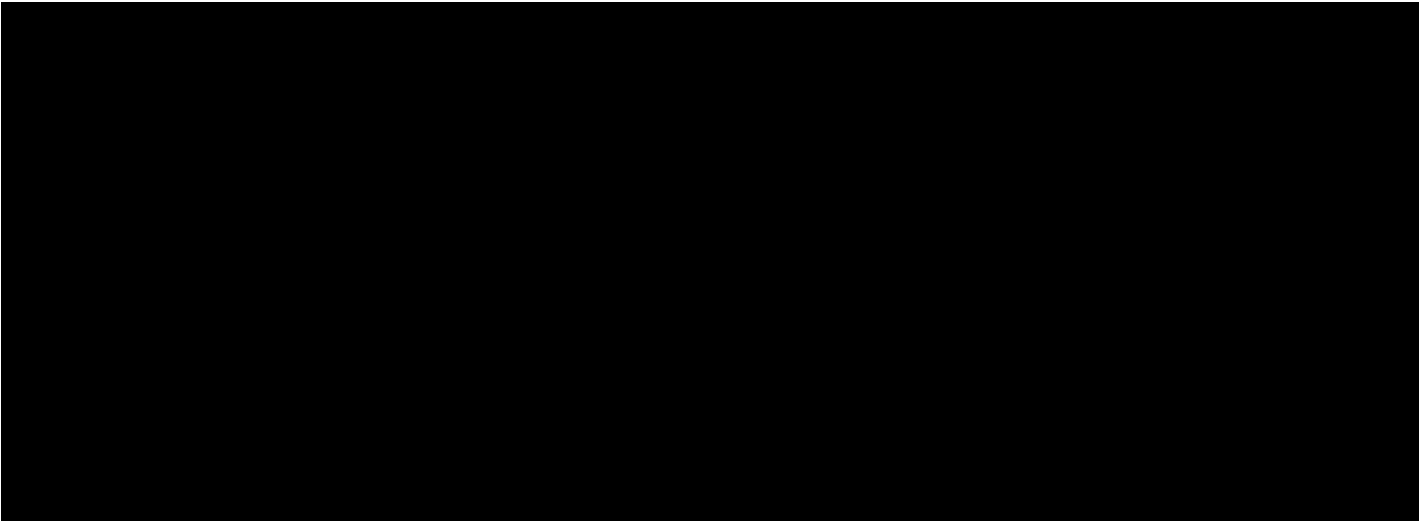
[REDACTED]


There are a number of reasons for this: [REDACTED]

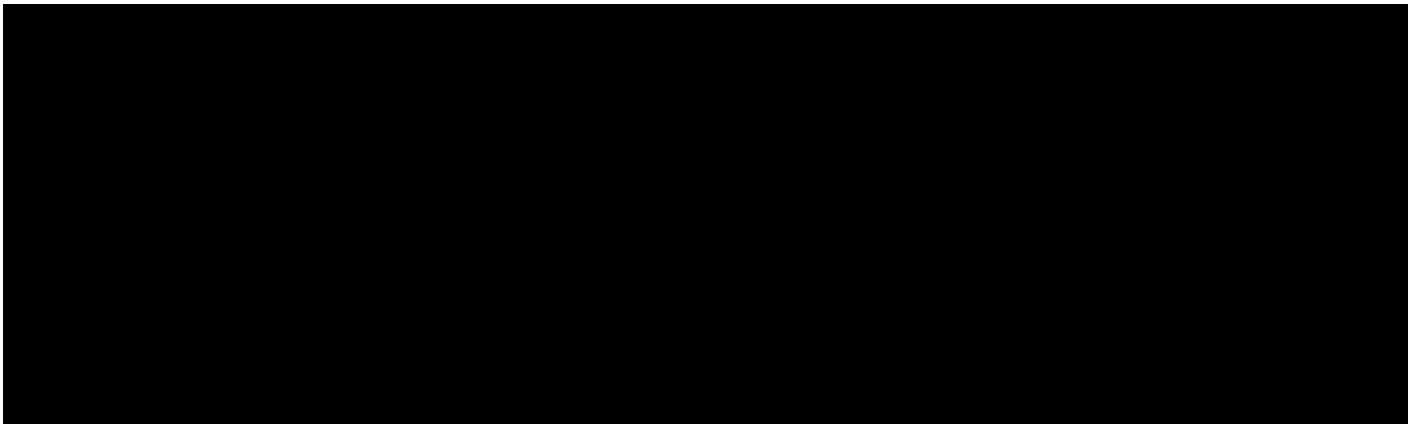
[REDACTED]

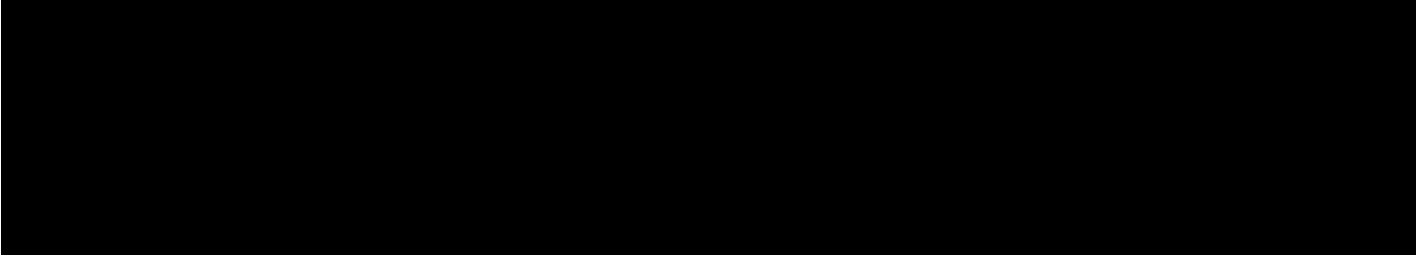


Since our conversation on January 7, 2024, Jim, I have subsequently suggested to you such 



Therefore, I shall be filing a Motion to Withdraw in the near future, hopefully within the next week or two. 





Should you wish to discuss any of the aforementioned, of course, please call.

Sincerely Yours,
Conor

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Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

From: Conor Corcoran (conor@jccesq.com)

To: [REDACTED]

Date: Monday, February 5, 2024 at 03:06 PM EST

Dear Jim:

As you will recall, on January 7, 2024, I telephoned you about my decision to eventually withdraw as your counsel in the above captioned matter, as I will be closing my law practice this year. This was a decision largely borne by a conflict that has arisen due to my overwhelming interest in certain family and personal matters [REDACTED]

In addition, during that conversation, I also told you about my concern that over and above this conflict, it is my opinion that [REDACTED]

There are a number of reasons for this: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Since our conversation on January 7, 2024, Jim, I have subsequently suggested to you such [REDACTED]

[REDACTED]

[REDACTED]

Therefore, I shall be filing a Motion to Withdraw in the near future, hopefully within the next week or two.

[REDACTED]



Should you wish to discuss any of the aforementioned, of course, please call.

Sincerely Yours,
Conor

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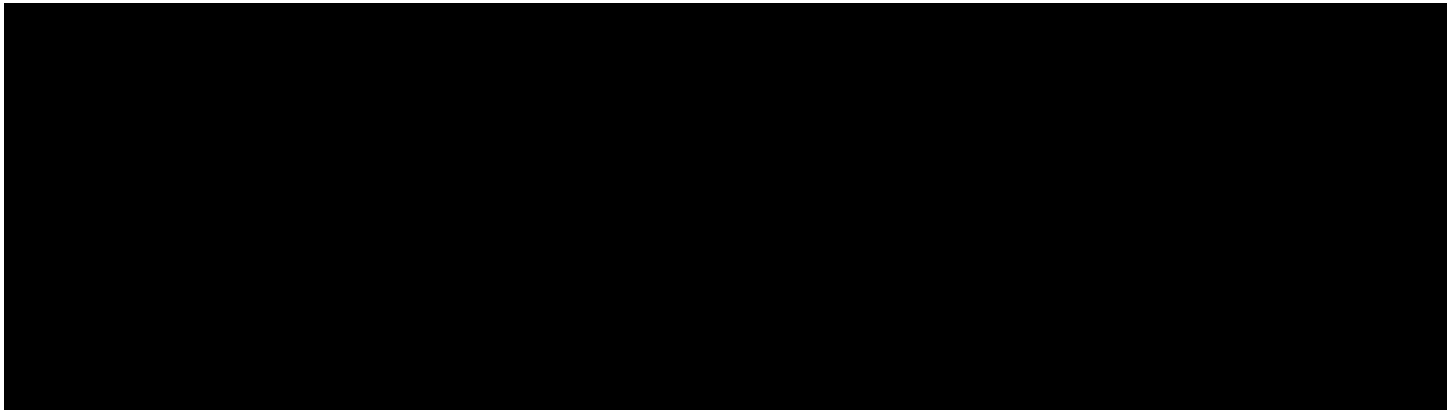
Re: External: Re: External: Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

From: Conor Corcoran (conor@jccesq.com)

To: [REDACTED]

Date: Saturday, February 17, 2024 at 01:47 PM EST

Dear Jim:



Will call you shortly in this respect.

- Conor

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<http://www.jccesq.com>

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On Saturday, February 17, 2024 at 01:43:08 PM EST, Savage, James [REDACTED]

Mr. Corcoran,

Based on your electronic communications and our most recent telephone conversation, I am assuming that your motion to withdraw from this case has already been filed. If that is not the case, I expect it will be filed by COB Monday. Please send me a copy of the motion once filed. In fact, please send me a copy of the entire case file. I want to be clear that I fully intend to find new counsel to pursue this matter [REDACTED]

Regards,

Case ID: 211002495
Control No.: 24024094

[REDACTED]

From: Conor Corcoran <conor@jccesq.com>

Sent: Wednesday, February 7, 2024 1:19:05 PM

To: Savage, James [REDACTED]

Subject: External: Re: External: Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

[REDACTED]

Hi Jim:

Yes, I saw that article as well. [REDACTED]

[REDACTED] While it does not have anything to do with your case, it is one of many reasons why I will be closing my law practice this year.

In the meantime, I will work to protect your interests in your matters, until such time as you retain new counsel, or the Court grants a Motion to Withdraw.

Sincerely Yours,
Conor

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On Tuesday, February 6, 2024 at 06:03:37 PM EST, Savage, James [REDACTED]

[REDACTED]

[REDACTED]

Case ID: 211002495
Control No.: 24024094

[REDACTED]

From: Conor Corcoran <conor@jccesq.com>

Sent: Monday, February 5, 2024 3:06:01 PM

To: James Savage [REDACTED]

Subject: External: Savage v. Trump - Update on case status, Giuliani bankruptcy, and pending Motion to Withdraw

[REDACTED]

Dear Jim:

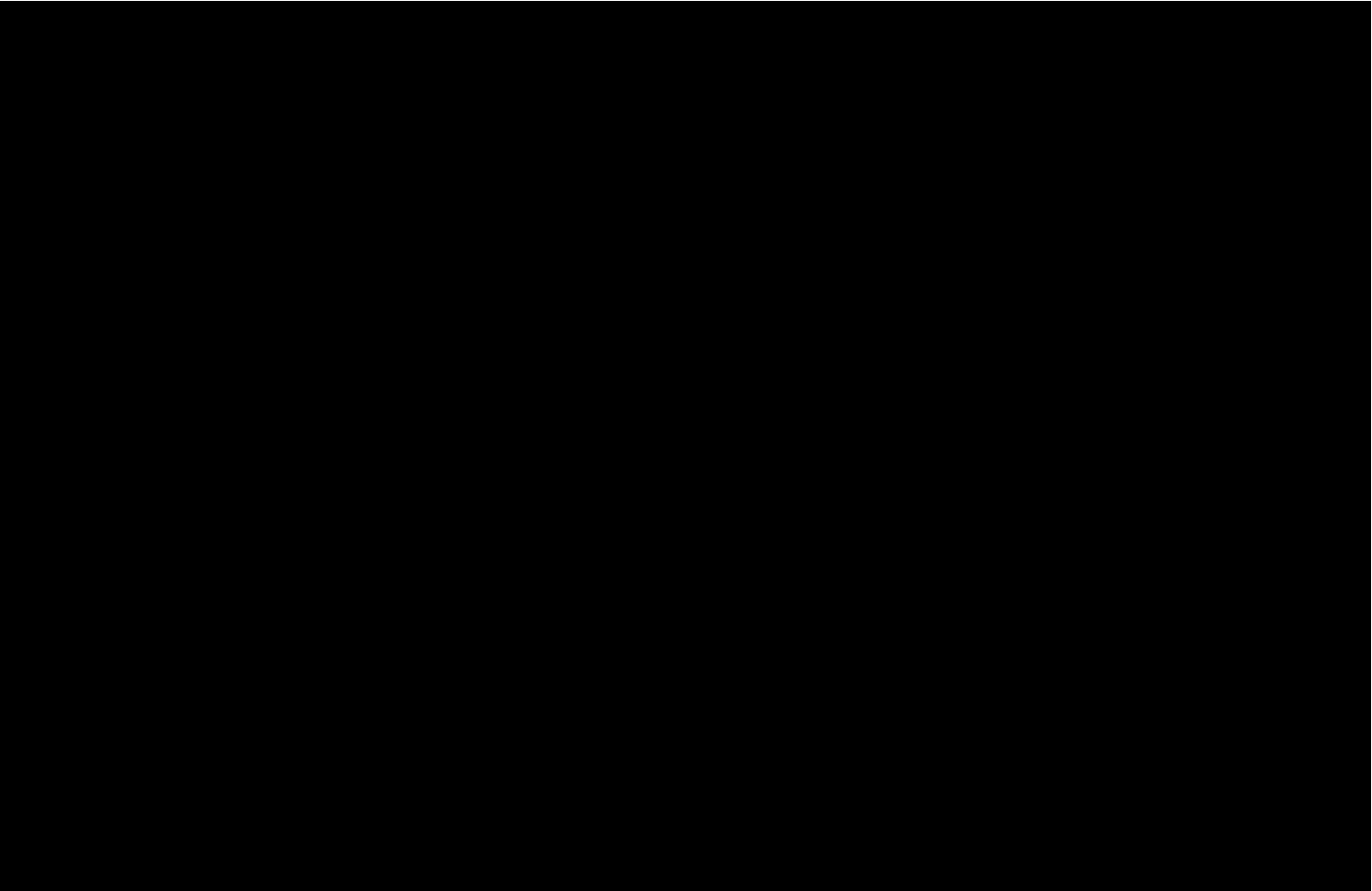
As you will recall, on January 7, 2024, I telephoned you about my decision to eventually withdraw as your counsel in the above captioned matter, as I will be closing my law practice this year. [REDACTED]

[REDACTED]

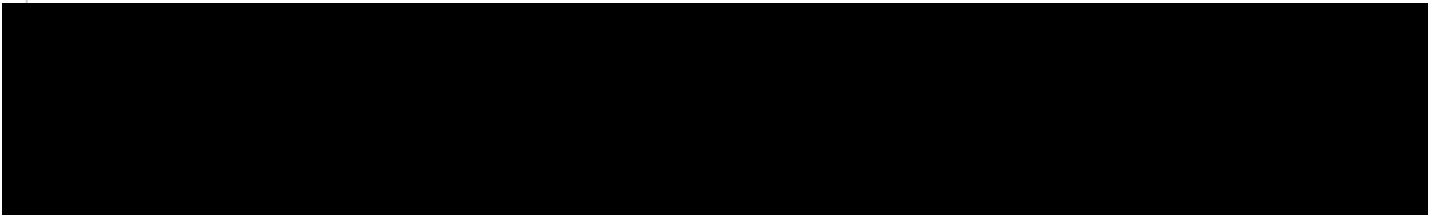
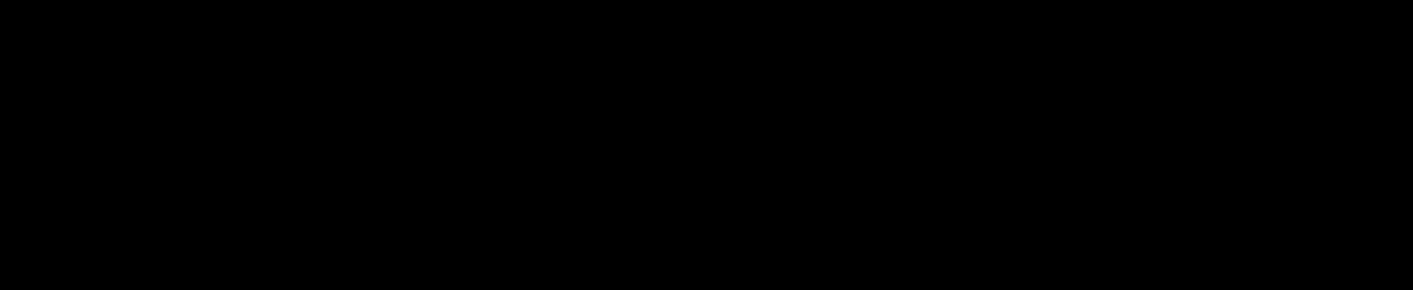
[REDACTED]

There are a number of reasons for this: [REDACTED]

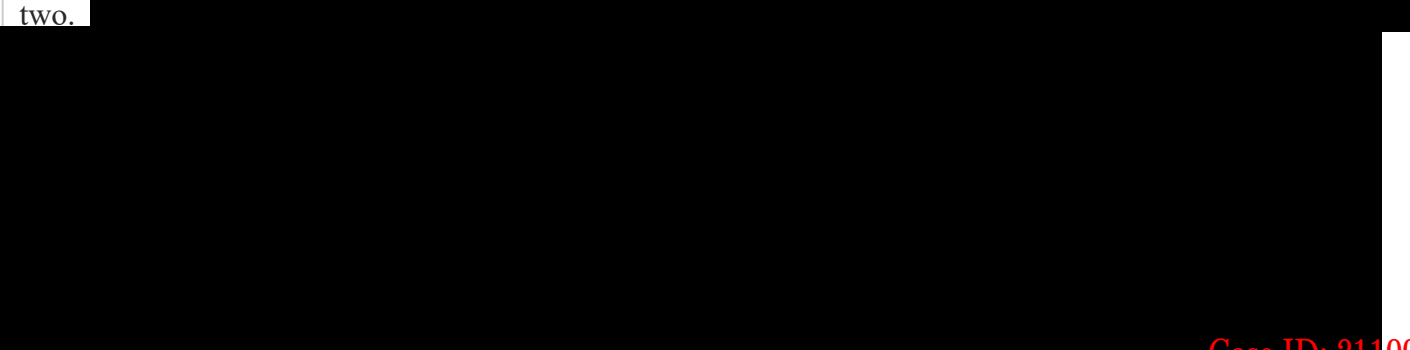
[REDACTED]



Since our conversation on January 7, 2024, Jim, I have subsequently suggested to you such 



Therefore, I shall be filing a Motion to Withdraw in the near future, hopefully within the next week or two.





Should you wish to discuss any of the aforementioned, of course, please call.

Sincerely Yours,
Conor

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EXHIBIT B

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:
Petitioner	:
	: No. ____ DB ____
v.	:
	: Atty. Reg. No. 89111
J. CONOR CORCORAN,	:
Respondent	: (Philadelphia County)

PETITION FOR DISCIPLINE

Petitioner, Office of Disciplinary Counsel (“ODC”), by Thomas J. Farrell, Esquire, Chief Disciplinary Counsel, and by Michael D. Gottsch, Esquire, Disciplinary Counsel, files the within Petition for Discipline and charges Respondent, J. Conor Corcoran, with professional misconduct in violation of the Rules of Professional Conduct as follows:

1. Petitioner, whose principal office is located at Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, Pennsylvania, is invested, pursuant to Rule 207 of the Pennsylvania Rules of Disciplinary Enforcement (hereinafter "Pa.R.D.E."), with the power and duty to investigate all matters involving alleged misconduct of an attorney

admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of said Rules of Disciplinary Enforcement.

2. Respondent, J. Conor Corcoran, was born on April 11, 1977, was admitted to practice law in the Commonwealth on October 23, 2002, maintains his office at 2601 Pennsylvania Ave., Ste. 501, Philadelphia, PA 19130, and is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.

CHARGE

3. On August 27, 2015, Thomas Siderio (“Siderio”) signed a contingent fee agreement in which he retained Respondent to represent him “concerning my police brutality case against any prospective defendant[.]”

4. The attorney’s fee was 33% of any gross recovery.

5. That agreement pertained to police brutality to which Siderio allegedly had been subjected.

6. That agreement did not pertain to any other legal matter.

7. On March 1, 2022, Siderio's then-12-year-old son, Thomas J. Siderio ("TJ") was shot and killed by a Philadelphia police officer.

8. On March 3, 2022, Respondent, purporting to represent Siderio, Sr. (TJ's father), filed a Writ of Summons naming Siderio "individually, and as Administrator of the Estate of Thomas Siderio" as the plaintiff.

9. Respondent's writ omitted TJ's mother, Desirae Frame.

10. Respondent had not met with or spoken with Siderio before filing the Writ of Summons. Respondent admitted the following in his

DB-7 Statement of Respondent's Position:

... I was unable to communicate with Mr. Siderio on that date, because I have never served as criminal counsel for Mr. Siderio, and therefore was not on SCI Coal Township's lists for approved attorney correspondence, in-person visitation, and/or telephone or Zoom calls as of that date.

I filed the Writ of Summons in the third matter [arising from TJ's death] on March 3, 2022, and the following morning, on March 4, 2022, I drove to SCI Coal Township [where Siderio was an inmate] to attempt direct communication with Mr. Siderio about the third matter [arising from TJ's death] and the

litigation of the same, on behalf of himself and T.J.'s estate.

Upon arrival at the prison, I was informed by the prison guard at the lobby front desk that, as I was not criminal counsel for Mr. Siderio (and therefore not on any attorney visitation list), that I could not speak with Mr. Siderio, and that Mr. Siderio would have to request that I be placed on the attorney visitation list.

* * *

11. Siderio had not retained Respondent with respect to any matters arising from TJ's death.

12. Further, at the time Respondent filed the Writ of Summons, no estate had been raised for TJ and there was no administrator for his estate.

13. Knowing the facts set forth in the two preceding paragraphs, Respondent nonetheless misrepresented to the court that Siderio was the administrator of TJ's estate, and implicitly, that Respondent represented him.

14. Motivated by a desire for attorney's fees that might be garnered from litigation over TJ's death, Respondent rushed to file a

Writ of Summons even though he did not represent Siderio, without obtaining Siderio's authorization or even speaking with him.

15. On March 10, 2022, a week after filing the Writ of Summons, Respondent filed a Petition for Probate and Grant of Letters Testamentary, purportedly on Siderio's behalf, seeking to have Siderio appointed as the sole administrator of TJ's estate.

16. In the section of the Petition where the petitioner is required to attest that "Petitioner(s), after a proper search has/have ascertained that Decedent left no will and was survived by the following spouse (if any) and heirs," Respondent listed only Siderio and omitted TJ's mother, Ms. Frame, even though Respondent was aware of her existence and her right to serve as the administrator, the co-administrator, or to renounce in favor of another.

17. Respondent's Petition for Probate and Grant of Letters Testamentary has never been granted.

18. Following TJ's death, numerous lawyers, including Respondent, Shaka Johnson, Esquire, and others were vying to obtain Siderio as a client in connection with TJ's death.

19. On or about April 22, 2022, Respondent furnished Siderio with a contingency fee agreement that Respondent requested he sign, pursuant to which Siderio would retain Respondent “with regard to any and all investigation(s), negotiation(s) for settlement and/or litigation concerning the murder of my son, T.J. Siderio, against any prospective defendant[.]”

20. That proposed agreement called for an attorney’s fee of 25% of any gross recovery.

21. Siderio never signed that proposed agreement.

22. Siderio informed Respondent orally that he had not called Respondent or hired Respondent to represent him in connection with TJ’s death.

23. Nearly two months after filing the Writ of Summons, purportedly on Siderio’s behalf, Respondent was still *attempting* to secure Siderio as a client.

24. By letter to Shaka Johnson, Esquire dated March 11, 2022, referencing Estate of TJ Siderio v. Mendoza, et al., Phila. C.C.P., March 2022, No. 0587, Respondent stated:

It is my understanding that you have been communicating with my client, Thomas Siderio, during the course of my representation of his interests in the above captioned matter, arising from the death of his son, TJ.

I sincerely hope my understanding is wrong, as I believe such behavior would constitute a violation of *inter alia* Rule 4.2 of the Pa. Rules of Professional Conduct.

Bob Mongeluzzi (who represents the interests of Desirae Frame, TJ's mother) is litigating the matter with me. All interested parties accordingly have the benefit of counsel.

Accordingly, if I am correct, please be advised that if you contact my client, or any members of his family with regard to the above captioned matter any further, I will initiate *inter alia* proceedings with the Disciplinary Board.

25. Thus, in his quest to obtain Siderio as a client in connection with TJ's death, Respondent sent a threatening letter to Johnson in an attempt to intimidate him, misrepresenting his (Respondent's) status, and making multiple false statements.

26. Respondent attempted to deprive Siderio, Respondent's former client, of his right to retain counsel of his own choosing.

27. By letter to Respondent dated May 5, 2022, Siderio stated “There’s multiple lawyers who want this case. 1 lawyer just offered me 20%. ... If you can beat 20% let my dad know, I need you to sign it and it has to state for trial [of] the whole case.”

28. Siderio never entered into a fee agreement with Respondent relating to the death of his son TJ.

29. On or about May 25, 2022, Respondent sent Siderio a Renunciation form for him to sign which would renounce his right to administer TJ’s estate and would designate Kristen L. Behrens, Esquire of Dilworth Paxson LLP as the administratrix of TJ’s estate.

30. Siderio never signed the renunciation that Respondent sent him.

31. By letter dated June 14, 2022, Ronald A. Clearfield, Esquire, informed Respondent that Siderio had retained Clearfield to represent him regarding the death of his son, TJ.

32. Clearfield attached a contingent fee agreement, dated June 2, 2022, signed by Siderio on that date, and notarized, which stated:

I hereby appoint the Law Offices of Ronald A. Clearfield & Associates as my attorneys to prosecute a claim for personal injuries against City of Philadelphia and Edsaul Mendoza or any other parties who shall be liable. The Claimant is Thomas Siderio for an accident/incident that occurred on March 1, 2022.

33. In his June 14, 2022 letter to Respondent, Clearfield further:

- a. informed Respondent that it had come to his attention that despite having no agreement with Siderio regarding representation in connection with TJ's death, Respondent may have taken action on Siderio's behalf;
- b. requested that Respondent cease and desist any and all action, including statements, legal filings, communications with counsel, and communications with any and all defendants; and
- c. requested that Respondent withdraw, without prejudice, the complaint filed under docket number 220300587.

34. The docket number referenced by Clearfield refers to the civil action that Respondent had initiated by filing the Writ of Summons on March 3, 2022, purporting to represent Siderio and TJ's estate.

35. Even if Respondent believed that Siderio had engaged Respondent or would engage Respondent to represent him in connection with TJ's death, Mr. Clearfield's letter to Respondent put Respondent on notice that Respondent was not retained by Siderio and was not authorized to act on his behalf.

36. On June 16, 2022, a case management conference was held, which Respondent attended. Respondent never advised the court that no estate had been raised for TJ or that Siderio had not been appointed as the administrator of TJ's estate.

37. In the civil action, docket number 220300587, Respondent named as the plaintiff "Thomas Siderio, individually and as the Administrator of the Estate of Thomas Siderio."

38. Siderio is not, and never has been, the Administrator of TJ's estate.

39. Respondent was never retained to represent Siderio or TJ's estate and was not authorized by any principal to file the writ of summons.

40. Respondent falsely told Siderio that by virtue of his August 27, 2015 fee agreement with Respondent for his police brutality case, he was under contract with Respondent to represent him in connection with TJ's death.

41. The 2015 contingency fee agreement pertained to the police brutality involving Siderio (which had occurred years before the case involving TJ and his estate).

42. It did not pertain to any other matters.

43. On June 17, 2022, Respondent filed a petition in the Orphans' Court Division of the Philadelphia Court of Common Pleas requesting that the court award a citation to Siderio to show cause why he should not be adjudicated an incapacitated person and have a plenary guardian of his estate appointed.

44. On that same day, Respondent filed a motion to defer case number 220300587 pending the appointment of a guardian for Siderio and to have such guardian substituted as the plaintiff in the case.

45. In that motion Respondent stated: “Plaintiff has been represented by undersigned counsel since 2015 pursuant to a contingency fee agreement (“CFA”) regarding matters including but not limited to police brutality[.]”

46. In the motion to defer, Respondent also asserted, falsely:

Thomas Siderio is believed by Petitioner and other persons who have had contact with him to be suffering from diagnosed and/or undiagnosed cognitive deficits, mental impairments, and/or drug addiction, and/or possibly other physical or mental impairments, which render him incapable of taking effective action with respect to the management of his assets and/or his person. ... Thomas Siderio is unable to manage his legal and financial affairs and property. Thomas Siderio receives oral and written information concerning his affairs assets [sic], but is unable to comprehend and, therefore, to act upon the information due to his condition, which has almost entirely obliterated his cognition and his ability to communicate about the same or his financial or legal affairs.

47. Respondent did not attach any expert medical report to support his claim that Siderio is legally incapacitated.

48. Unless and until there is a court finding of incapacity Siderio is presumed to be competent and is free to select counsel of his choice.

49. Respondent used Siderio's confidential medical information to Siderio's disadvantage.

50. Such information is information relating to the representation or prior representation within the meaning of Pennsylvania Rules of Professional Conduct 1.6(a) and 1.9(c)(1) and (2).

51. Respondent did not obtain Siderio's informed consent to reveal such information.

52. Respondent did not obtain Siderio's informed consent to use such information.

53. Respondent's revealing of such information was not impliedly authorized under RPC 1.6(b) or (c).

54. Respondent's revealing of such information was not necessary to comply with the duties stated in RPC 3.3.

55. Respondent did not reasonably believe that revealing such information was necessary for any purpose stated under RPC 1.6(c).

56. Respondent's use of such information was not permitted or required by the Rules of Professional Conduct.

57. Such information had not become generally known.

58. Respondent knew that Siderio was not incapacitated and was perfectly capable of making his own decisions. Nonetheless, in an attempt to force his representation on Siderio, and to secure the substantial attorney's fees that a case over TJ's death might bring, Respondent betrayed Siderio's (his former client's) trust.

59. Siderio never expressly or impliedly authorized Respondent to disclose, nor consented to Respondent's disclosure of, any alleged impairments or of any disclosure whatsoever of Siderio's medical records.

60. On June 22, 2022, Siderio gave a statement under oath, before a court reporter, in which Siderio stated, *inter alia*, that:

- a. he did not authorize Respondent to file a suit on his behalf arising from TJ's death;
- b. he never retained Respondent to represent him in connection with TJ's death;
- c. Respondent told him that he was under contract with Respondent in connection with TJ's death based on the 2015 fee agreement from Siderio's police brutality case; and
- d. he did not call or hire Respondent; Respondent just showed up at the prison uninvited but Siderio did not meet with Respondent in person.

61. On June 29, 2022, Siderio, who has never been appointed as the administrator of TJ's estate, signed a notarized Renunciation of the right to administer TJ's estate and requested that Letters be issued to Kristen L. Behrens, Esquire.

62. On July 12, 2022, Letters of Administration were granted to Kristen L. Behrens to be the administratrix of TJ's estate.

63. On July 14, 2022, knowing that Siderio was not and never had been the administrator of TJ's estate, that the petition for a grant of letters to him (filed by Respondent) had not been granted, and that Respondent had not been retained and was not authorized to represent Siderio, Respondent nevertheless filed a complaint asserting counts for civil assault and intentional infliction of emotional distress knowingly and falsely asserting that "Plaintiff is the Administrator of the Estate of Thomas Siderio, a/k/a T.J. Siderio"

64. Respondent filed that complaint notwithstanding that lawyers from Saltz, Mongeluzzi & Bendesky, P.C. had warned Respondent against doing so because the complaint contained inaccurate and false information.

65. Further, at the time Respondent filed the complaint, he knew that the Register of Wills had informed him that it would not appoint Siderio as administrator or co-administrator of TJ's estate because Siderio was incarcerated.

66. Respondent verified the complaint under penalty of perjury, subject to 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

67. Further, having knowledge that Ms. Frame, who was separately represented by other lawyers, would not “join” in the complaint because it was an improper filing that contained inaccurate and false information, Respondent nevertheless stated in the complaint: “Plaintiff anticipates that Desiree [sic] Frame, young T.J.’s mother, will join the above captioned matter individually and/or as co-Administrator of the Estate, through the auspices of her counsel, Robert Mongeluzzi and Andrew Duffy of Saltz, Mongeluzzi, & Bendesky, P.C. and/or through a jointly selected third party Administrator, Kristen Behrens of Dilworth Paxson, in the near future”

68. Even though, at a case management conference held on June 16, 2022, the court had ordered that a complaint be filed within 30 days of that date, Respondent has never been authorized by the court, by Siderio, or by the Orphans’ Court to act on behalf of Siderio.

69. Rather than file a complaint that Respondent had no authority to file, Respondent could have withdrawn the summons, dismissed the civil action without prejudice, or sought appropriate relief from the court.

70. On July 15, 2022, Kristen L. Behrens, Esquire, as “Administratrix of the Estate of Thomas Siderio Jr.,” signed a contingent fee agreement/retainer appointing Saltz Mongeluzzi & Bendesky P.C. and the Law Office of Ronald A. Clearfield and Associates, P.C. as attorneys to prosecute, on behalf of TJ’s estate, “a claim for personal injuries and/or civil rights violations against The City of Philadelphia, Police Officer Edsaul Mendoza and any and all other defendants arising out of the death of Thomas Siderio, Jr. on March 1, 2022.”

71. On July 19, 2022, Respondent filed a motion to disqualify and remove the Law Offices of Ronald A. Clearfield & Associates, Saltz Mongeluzzi & Bendesky, P.C., and Kristen Behrens, Esquire in case number 220300587.

72. Respondent had no legal or factual basis to seek the disqualification of Ms. Frame's or Ms. Behrens's choice of attorneys.

73. In that motion, Respondent made numerous false assertions, including that he represented Siderio in the matter, and also revealed medical information that Respondent obtained in the course of his prior representation of Siderio, paragraphs 19-22 of the motion and Exhibit H thereto (attaching medical records of Siderio).

74. On July 22 2022, Orphans' Court Judge Stella M. Tsai dismissed Respondent's petition to have Siderio declared an incapacitated person.

75. In her opinion accompanying her dismissal order, Judge Tsai recounted the contents of Siderio's May 5, 2022 letter to Respondent, and then noted that: on June 6, 2022, Siderio signed a contingent fee agreement with the Law Office of Ronald A. Clearfield & Associates to represent him in TJ's case; on June 14, 2022, the Law Office of Clearfield & Kofsky sent Respondent a cease and desist letter advising him that they were representing Siderio in TJ's case and requesting that Respondent take no further action in the matter; three

days later, on June 17, 2022, Respondent filed his petition asking the court to adjudicate Siderio an incapacitated person and to have a plenary guardian of his estate appointed.

76. In dismissing Respondent's petition, Judge Tsai stated that "[t]he primary evidence cited by [Respondent] to demonstrate Mr. Siderio's alleged incapacities are his conclusory assertions to that effect. Notably, there is no medical evidence or other reliable expert evidence presented to support the Petition." Opinion at 6.

77. She further stated:

[Respondent's] own exhibits undermine his showing that Mr. Siderio is incapacitated. Mr. Siderio's May 5, 2022 letter to [Respondent] is clear and cogent. Mr. Siderio is aware that other lawyers are interested in representing him in the corollary civil action [over TJ's death], he lists several reasons why he is entertaining other offers of representation, and he even allows [Respondent] the chance to make him a better offer. Far from "obliterated" cognition [as Respondent alleged], Mr. Siderio exhibits "comprehension of the nature of his currently pending litigation." Beyond this, [Respondent] lends credence to the substance of Mr. Siderio's letter (and therefore, Mr. Siderio's capacity) by relying on it himself as evidence of

third-party interference with his representation of Mr. Siderio in the corollary civil action. ...

... With scant, if any, evidence that Mr. Siderio is in fact incapacitated within the meaning of the law, [Respondent's] overarching concern over the disruptive effect of "vexatious efforts," "tortious interference," and "poaching" has little, if anything, to do with an adjudication of Mr. Siderio's capacity, but rather further indicates that [Respondent] filed this guardianship proceeding to preserve his role in the corollary civil action. ...

Given the factual record presented in the Petition, the Petition is demonstrably incomplete and fails to provide sufficient facts to proceed and is not instituted to benefit Mr. Siderio.

78. On July 25, 2022, Respondent filed a praecipe to withdraw his appearance in the civil action he had filed naming Siderio as the plaintiff (March 2022 No. 587, Case ID 220300587). Respondent noted that Siderio was being represented by other counsel who had entered their appearance on June 23, 2022.

79. By order dated August 15, 2022, Respondent's motion to disqualify and remove the other lawyers was denied.

80. On March 7, 2023, Respondent sent an email to Ron Clearfield, Andrew Duffy, and Mark Schiavo (of Dilworth Paxson LLP), with copies to Robert Mongeluzzi, Ben Hoffman (of Clearfield & Associates), Kristen Behrens, and Anthony Lopresti (of Clearfield & Associates), stating:

Dear Ron, Andrew and Mark:

I'm considering a lawsuit against your respective firms for claims of tortious interference, breach of contract, and civil conspiracy, arising from the TJ Siderio case.

81. On information and belief, Respondent has never filed the threatened lawsuit.

82. By his conduct as alleged in Paragraphs 3 through 81 above, Respondent violated the following Pennsylvania Rules of Professional Conduct:

a. RPC 1.2(a), which states that "Subject to paragraphs (c) and (d), a lawyer shall abide by a client's decisions concerning the objectives of representation and, as required by Rule 1.4, shall consult with the client as to the means by which they are to be pursued. A

lawyer may take such action on behalf of the client as is impliedly authorized to carry out the representation. ...”

b. RPC 1.6(a), which states that “A lawyer shall not reveal information relating to representation of a client unless the client gives informed consent, except for disclosures that are impliedly authorized in order to carry out the representation, and except as stated in paragraphs (b) and (c);

c. RPC 1.6(d), which states that A lawyer shall make reasonable efforts to prevent the inadvertent or unauthorized disclosure of, or unauthorized access to, information relating to the representation of a client;

d. RPC 1.9(c)(1), which states that a lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter use information relating to the representation to the disadvantage of the former client except as the Rules of Professional Conduct would permit or require with respect to a client, or when the information has become generally known;

e. RPC 1.9(c)(2), which states that a lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter reveal information relating to the representation except as the Rules of Professional Conduct would permit or require with respect to a client;

f. RPC 3.1, which states that a lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous, which includes a good faith argument for an extension, modification or reversal of existing law;

g. RPC 3.3(a)(1), which states that a lawyer shall not knowingly make a false statement of material fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

h. RPC 4.1(a), which states that in the course of representing a client a lawyer shall not knowingly: (a) make a false statement of material fact or law to a third person;

i. RPC 8.4(c), which states that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation; and

j. RPC 8.4(d), which states that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

WHEREFORE, Petitioner prays that your Honorable Board appoint, pursuant to Rule 205, Pa.R.D.E., a Hearing Committee to hear testimony and receive evidence in support of the foregoing charges and upon completion of said hearing to make such findings of fact, conclusions of law, and recommendations for disciplinary action as it may deem appropriate.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

Thomas J. Farrell
Chief Disciplinary Counsel

By: Michael D. Gottsch
Michael D. Gottsch
Disciplinary Counsel
Attorney Registration No. 39421

1601 Market Street
Suite 3320
Philadelphia, PA 19103
(215) 560-6296

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA


OFFICE OF DISCIPLINARY COUNSEL, :
Petitioner :
 :
 : No. ____ DB ____
 :
 v. :
 :
 : Atty. Reg. No. 89111
 :
 J. CONOR CORCORAN, :
 Respondent : (Philadelphia County)

VERIFICATION

I verify that the statements made in the foregoing Amended Petition for Discipline are true and correct to the best of my knowledge or information and belief. This statement is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

12/7/23

Date



Michael D. Gottsch
Disciplinary Counsel

CERTIFICATE OF COMPLIANCE

I certify that this Petition for Discipline, in No. C1-22-470, 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.

Submitted by: Office of Disciplinary Counsel

Signature: Michael D. Gottsch

Name: Michael D. Gottsch, Disciplinary Counsel

Attorney No. (if applicable): 39421

EXHIBIT C

Gregory Stenstrom, Pro Se 1541 Farmers Lane Glen Mills, PA 19342 856-264-5495 gregorystenstrom@gmail.com gstenstrom@xmail.net	Leah Hoopes, Pro Se 241 Sulky Way Chadds Ford, PA 19317 610-608-3548 leahfreedelcopa@protonmail.com
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**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
PENNSYLVANIA (CIVIL DIVISION)**

JAMES SAVAGE

CASE ID NO.: 211002495

Plaintiff,

v.

MOTION FOR SANCTIONS

DONALD J. TRUMP, et al,

Defendants

DEFENDANT’S MOTION FOR SANCTIONS PURSUANT TO PA. R.C.P. 1023.2

1. Pro Se Defendants Leah Hoopes and Gregory Stenstrom hereby move for, and demand, sanctions against Plaintiff and its counsel pursuant to Rule 1023.2 of the Pennsylvania Rules of Civil Procedure. In support of this motion. Hoopes and Stenstrom avers as follows:

PRELIMINARY STATEMENT

2. This action is necessary and must be adjudicated to enforce Pa.R.P.C. (PA Rules of Professional Conduct), prevent further abuse of the Honorable Court, and protect the lives, liberty, property, and rights of Defendants.
3. Defendants have repeatedly rung the bell for action in previous motions and hearings, but the Court has refused to act, and remained mute to Plaintiff’s attorney’s outrageous abuses.
4. Plaintiff’s attorney has repeatedly come to this Honorable Court with unclean hands, misconduct, false testimony, and statements, attempted to unlawfully procure jurisdiction with baseless allegations, and acted with moral turpitude, fraud, and blatant malfeasance.

STATEMENT OF FACTS

5. J. Conor Corcoran was admitted to practice law in the Commonwealth on October 23, 2002, and has practiced since 2014 out of a 600-square foot, one-bedroom, one-bath, residential condominium at 2601 Pennsylvania Ave, Unit 501, Philadelphia, PA 19130.
6. Attorney Corcoran has made multiple baseless allegations that Pro Se Defendants Stenstrom and Hoopes have threatened the Honorable Court with incendiary explosives in public statements to the news media, in Court filings, and in multiple hearings.
7. It has come to the recent attention of Pro Se Defendants Stenstrom and Hoopes that disciplinary charges were filed in June 2023 against attorney Corcoran for actions, as reported in the Philadelphia Inquirer and other mainstream media, regarding false statements, allegations, and threats Corcoran made against other litigants and their attorneys, similar to his actions throughout the trajectory of the subject case, that compel the Honorable Court to take action and grant sanctions. (See Exhibits A, B, and C).
8. Plaintiff's and Plaintiff's attorney's conjectural complaint of November 1st, 2021, did not include a single material fact, and they have still not presented a single substantiated material fact after 835 days, and missing three Discovery deadlines.

ATTORNEY CORCORAN ALLEGES THREATS OF VIOLENCE

9. Attorney Corcoran swore before the Court in written (verified) filings and oral testimony in the hearings of June and November 2023 that he filed criminal complaints against Defendants Stenstrom and Hoopes with the Federal Bureau of Investigation (FBI) and Pennsylvania Attorney General, in furtherance of his demand that Stenstrom and Hoopes be sanctioned for tens of thousands of dollars, silenced, gagged, disarmed and have a restraining order limiting their liberty (see Exhibits D and E).
10. These serious, and now provably false and callous charges by Attorney Corcoran jeopardized the lives of Pro Se Defendants Stenstrom, Hoopes, their families, children, and property.
11. Had FBI and law enforcement officers actually been notified as attested to by Corcoran, they would have had a duty to act decisively, and execute forcible raids and entry of Stenstrom and Hoopes' homes, perhaps killing them, and destroying their properties, as has been the case with multiple "SWATTING" attacks in the United States perpetrated by bad actors intent on terrifying, and harming political and/or ideological opponents.

12. Subsequent to attorney Corcoran's allegations and sworn attestations, Pro Se Defendants Stenstrom and Hoopes submitted federal Freedom of Information Act ("FOIA") and Pennsylvania Right to Know (RTK) requests asking for any records, call logs, reports or any other evidence that would verify attorney Corcoran's sworn allegations, for which they have received responses of "no responsive records." (See Exhibits F, G and H).
13. When confronted with that information in the most recent hearing, attorney Corcoran blandly ~~connected~~ testified that he had made a 30-minute call with the FBI during which he somehow failed to obtain the agent's name or case number, nor could he recall the date or any other details of the call regarding his allegations that Defendants intended to use "incendiary devices" against Judge Erdos, Plaintiff Savage and himself.
14. Corcoran then added that he had spoken with "someone" in the Pennsylvania Attorney General's office but also could not recall the date, or any other specifics.
15. Pro Se Defendants Stenstrom and Hoopes demanded in the hearing that the Honorable Court take disciplinary action against attorney Corcoran, which was taken under consideration by Judge Erdos, but as of yet remains adjudicated.
16. Pro Se Defendants Stenstrom and Hoopes filed disciplinary charges against attorney Corcoran with the Pennsylvania Disciplinary Committee ("PDC") but they were rejected because there have been no findings, sanctions or censure by an Honorable Judge or fellow licensed esquires against Corcoran in a presumably "self-governing" body where Pro Se litigants hold little to no standing or regard. (See Exhibit B).
17. Pro Se Defendants Stenstrom and Hoopes do not share the humor that Attorney Corcoran finds in his jocular courtroom impersonations of Saturday "Night Live" Jon Lovitz's pathological liar character "*Yeah..., yeah..., that's the ticket,*" excuses when caught in obvious, repeated perpetrations of fraud upon them and the Court.

PENDING DISCIPLINARY CHARGES AGAINST ATTORNEY CORCORAN

18. As alliterated in the disciplinary charges in Exhibit C, Corcoran previously represented Thomas Siderio, August 27th, 2015, based on retainer and contingency fee agreement concerning police brutality, and no other legal matter as per filing.
19. On March 1st, 2022, Siderio's 12-year-old son Thomas J Siderio was shot and killed by a Philadelphia Police officer.
20. March 3rd, 2022, J Conor Corcoran purported to represent Siderio, Sr (TJ's father) filed a

Writ of Summons naming Siderio individually and as Administrator of the Estate of Thomas Siderio as the plaintiff.

21. Corcoran did not meet with or speak to Thomas Siderio before filing this Writ of Summons and then admitted that he did not in his own statements.
22. Siderio did not retain J Conor Corcoran for any matters arising from TJ's death, nor had an estate been raised for TJ nor an administrator for the estate.
23. The Disciplinary Counsel avers that Corcoran misrepresented to the court in multiple filings, in multiple venues that he represented Thomas Siderio, they also make claim that the Corcoran was motivated by attorney's fees for the high-profile case.
24. Corcoran went to the lengths of filing in a Petition for Probate and Grant of letters Testamentary, purportedly on Siderio's behalf, seeking to have Siderio appointed as the sole administrator of TJ's estate, in fraudulent and willful misconduct.
25. In the petition Corcoran attested that Siderio did a proper search and that the decedent left no will and survived only by spouse and heirs, and never placed TJ's mother this was never granted.
26. There were attempts by other attorney's to represent Thomas Siderio, in the interim, Corcoran sent an agreement April 22, 2022, after he had already filed the writ of summons, to get Siderio to sign a contingency fee agreement and retain him, the agreement was never signed, this attempt continued for months in attempt to get him to sign and secure him as a client.
27. Corcoran then sent threatening letters to attorney Shaka Johnson, misrepresenting and falsely stating that he in fact represented Thomas Siderio, this is a deprivation of rights to seek counsel and retain through their own choosing.
28. He furthered the fraud and attempt to steal this estate by demanding Siderio sign a Renunciation form for him to sign which would renounce his right to administer TJ's estate and would designate Kristen L Behrens Esquire of Dilworth Paxson LLP as administratrix of TJ's estate, this was never signed.
29. Siderio retained Ronald Clearfield in June 2022 and sent a letter to J. Conor Corcoran with attached agreement demanding cease and desist and withdraw filings.
30. Case Management hearing occurred civil docket number 220300587, and facts were found

that Corcoran did not have an agreement and was not authorized to file the Writ of Summons. Further, he falsely told Siderio that by virtue, the 2015 agreement was under contract, giving him rights to represent him in his son's death, perpetrating more fraud.

31. The Siderio case and charges by the Disciplinary Committee reflect attorney Cororan's overall approach to the practice of law and willingness to abuse the Court systems, unlawfully harass and intimidate litigants, and threaten opposing attorneys with frivolous complaints.

CORCORAN HARRASSMENT OF DEFENDANTS AND THEIR ATTORNEY

32. Defendants' Stenstrom's and Hoopes' former attorney (Thomas Carroll) signed the initial Verification on behalf of now Pro Se Defendants in their Preliminary Objections and New Matter Affirmative Defenses, which is permissible by Pa.R.C.P..
33. Attorney Corcoran filed for sanctions against Defendants Stenstrom and Hoopes, accusing them of lying, and Defendants' attorney Carroll of false verification, demanding \$3,000 in sanctions and attorney fees.
34. Attorney Carroll properly objected, citing Pa.R.C.P. and Title 52 statutes that counsel could verify filings, but nevertheless resubmitted Verification with Defendants Stenstrom and Hoopes signatures.
35. Corcoran himself did the exact same thing in his own initial complaint and filed a revised Verification with Plaintiff Savage's signature (see below).



Figure 1 - Plaintiff Verification for Initial Complaint

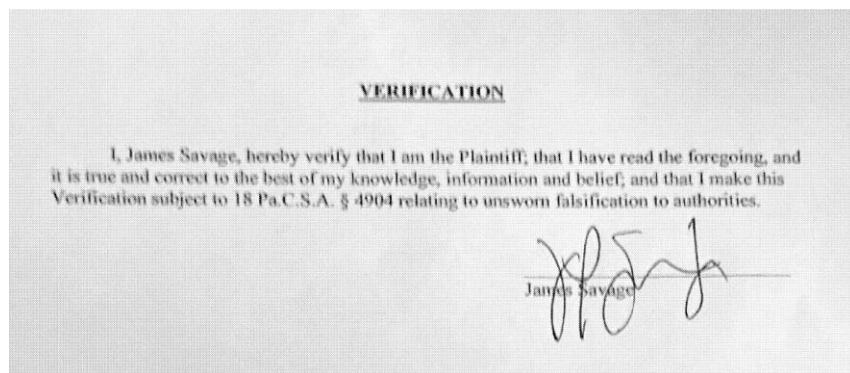


Figure 2 - Plaintiff refiling of Verification.

36. Yet, Judge Cunningham (who has since recused himself from the subject case(s), along with Judge Cohen), ordered attorney Carroll to pay \$3,000 in sanctions to Corcoran, despite statutes, and full knowledge that Corcoran had done the exact same thing in Plaintiff's filing of its instant complaint.
37. This is only one example of multiple inequities in which the Court has permissively condoned attorney Corcoran's antics while penalizing Defendants, throughout the entire trajectory of this case.

CORCORAN MODUS OPERANDI AND ABUSE OF COURTS

38. Pro Se Defendants cited multiple examples of attorney Corcoran's repeated behavior of ignoring Case Management Order (CMO) deadlines in other cases, including *McDavid v Corcoran*, and filing frivolous procedural motions with contrived reasons for missing deadlines and demands that the Court find in his favor without benefit of any further due process. (see Exhibit I (Control No. 23044066)).
39. Corcoran's standard modus operandi of skidding into the Court and dockets the day before the close of Discovery after hundreds of days of silence with some contrived version of "the dog ate my homework" excuse for his lack of due diligence spans virtually every case that he has been involved in with the Philadelphia Court of Common Pleas.
40. In the subject case, with the CMO Discovery deadline within one day of closing, attorney Corcoran crafted an entirely duplicative "new" case against President Trump which he simultaneously filed for consolidation, while also simultaneously filing a similar defamation case against Defendants Stenstrom and Hoopes in the Delaware County Court of Common Pleas, for which he previously insisted that the Philadelphia Court of Common Pleas was the appropriate venue for the same Plaintiff (Savage), hence creating

three separate cases for the same Plaintiff against the same Defendants in two separate jurisdictions, using the same conjectural accusations without the benefit of a single material fact to support any of them.

LOSS OF LIBERTY

41. Attorney Corcoran's callousness has not only cost civil litigants immeasurable pain and wasted the Honorable Court's time, but for those unfortunates enough to retain him for criminal matters – it has cost them their liberty.
42. In the case of *Jean Desir v Corcoran* (Case No. 3216), Desir, a homeless schizophrenic who lists his address as a church shelter in Philadelphia, was solicited by Corcoran to represent him in a reckless driving case in which he was convicted and sentenced to seven months imprisonment. (See Exhibit J).
43. Desir's Pro Se malpractice suit lists the following charges against attorney Corcoran:
 - a. Failing to properly prepare for trial;
 - b. Failing to obtain an appropriate expert;
 - c. Failing to provide said expert with all relevant medical records;
 - d. Failing to offer material testimony at trial;
 - e. Failing to present/prepare necessary documentation during the course of Plaintiff's case;
 - f. Generally failing to properly and timely prosecute Client's case.
44. While Desir did not follow up, and Corcoran filed for administrative dismissal of the case (still pending), the charges mirror Corcoran's approach to the subject cases, where after months of dormancy, he appears in Court unprepared with empty pockets, no evidence, no medical records, and without any material facts.

NO MEDICAL RECORDS

45. In *Brown v Broke Flats*, a "slip and fall" case filed by attorney Corcoran on behalf of solicited Plaintiff for \$100,000, the Defendant in that case personally conveyed to Pro Se Defendant Hoopes that Corcoran had no medical records nor any evidence, and settled the case for \$2,000, which Defendant paid as an extortive, nuisance fee.
46. Pro Se Defendants Stenstrom and Hoopes have unsuccessfully demanded, since June

2023, that Plaintiff and Plaintiff's attorney Corcoran provide provenance for the sole piece of evidence he has provided in the subject case, that being a single photograph he has presented as "evidence" that Defendant Stenstrom slept, like Rip Van Winkle, through the entirety of five (5) days of the November 2020 "Election week."

47. When Pro Se Defendants Stenstrom and Hoopes pressed for medical records documenting Plaintiffs alleged "two heart attacks," after the more than 800+ days that this subject case has been permitted to drag on, and three blown Discovery deadlines, Corcoran stated he did not have any, and that he had been unable to obtain them from Plaintiff Savage, and that Pro Se Defendants Stenstrom and Hoopes would have to subpoena them.

SHAKEDOWN OF PHILADELPHIA DISTRICT ATTORNEY SETH WILLIAMS

48. Attorney Corcoran further demonstrated his propensity to seek publicity with frivolous claims in his federal lawsuit against former District Attorney Seth Williams for fair use of a photograph of the Philadelphia city skyline he posted in his Twitter social media account. (see Exhibit K).

49. Corcoran publicly confronted and harassed District Attorney Seth Williams in a crowded restaurant during a 2013 Election Day luncheon on William's behalf, followed by a harassing phone call to Williams, which the former District Attorney called an attempt to "*shake me down over some silly picture.*"

50. Corcoran then somehow secured multiple depositions through the Philadelphia Discovery Motions Court, in which he further conjecturally accused District Attorney Williams of unethically and unlawfully using a city employee to maintain his Twitter account, which the employee refuted.

51. Williams' attorney, Anthony Twardowski, publicly characterized Corcoran's behavior as "*baseless and extortionate threats*" in an "*effort to strong-arm a settlement.*"

52. Twardowski also reported Corcoran's extortive and "*groundless threats*" to the state Attorney General's Office and the U.S. Attorney's Office.

"IN TALULLAH WE TRUST"

53. Corcoran has repeatedly characterized Pro Se Defendants Stenstrom and Hoopes as "*violent Christian fundamentalists*" in written filings with the Court, and contemptuously spitting out the same words in multiple hearings.

54. A basic precept and assumption of the Honorable Court is that licensed attorneys, litigants, and witnesses sworn attestations are truthful, and at a minimum they can be held accountable for lying under oath, and that they treat their oaths and testimony with somber respect.
55. Attorney Corcoran’s website churns “In God We Trust” on its head with a “In Tallulah We Trust” logo that is within his 1st Amendment protected right to do so, but as a licensed attorney, it plainly communicates his disdain and contempt for others’ religious beliefs and the sobriety and thoughtfulness in which they make their solemn oaths before the Courts.



The Law Office of J. Conor Corcoran
 1650 Market Street
 Suite 3600, PMB 00455
 Philadelphia, PA 19103
 (215) 735-1135

Figure 3 - Plaintiff Attorney Corcoran Website Logo

“GOOD PEOPLE DISOBEY BAD LAWS”

56. Plaintiff’s attorney Corcoran demonstrated contempt for the law and willful abuse of the Honorable Courts for his personal amusement and self-enrichment is further evidenced in his filed trademark of “Good People Disobey Bad Laws,” which he liberally uses in his email signatures, correspondence, social media, and public statements to the news media.


Wordmark	GOOD PEOPLE DISOBEY BAD LAWS
Status	LIVE REGISTERED
Goods & services	IC 045: Attorney services; Attorney services, namely, representation... 
Class	045
Serial	90421937
Owners	Law Office of J. Conor Corcoran, P.C. (CORPORATION; PENNSYLVANIA, USA)

Figure 4 - Plaintiff’s attorney Corcoran Trademark

IRS LIEN OF \$113,071.97 AGAINST ATTORNEY CORCORAN

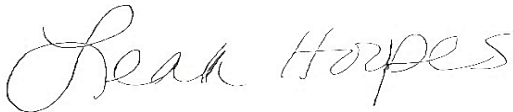
57. Plaintiff's attorney Corcoran had a federal IRS tax lien for \$113,071.97 filed against him on January 24th, 2020, for twelve (12) years of unpaid taxes. (See Exhibit L).
58. This lien closely predates attorney Corcoran's actions described herein, and while perhaps not of particular concern to him based on his self-reported annual income of \$641,000 (see Exhibit M), or even as financial motivation for filing frivolous lawsuits, provides yet another data point for the Honorable Court's consideration of appropriate sanctions that might motivate attorney Corcoran to adhere to the Pa.R.P.C. preamble which states that licensed attorneys' action must be worthy of special trust and confidence of the Courts, Judges, and other attorneys, which are a collective "self-governing" body.

REMEDY

59. Plaintiff and Plaintiff's attorney, J. Conor Corcoran, have sued for \$1,000,000 plus attorney fees, in a defamation lawsuit against the President of the United States of America, Donald Trump; the former Attorney General for the State of Kansas, Phil Kline; the former Mayor of New York City, Rudy Giuliani; licensed attorney Jenna Ellis; the Thomas More Society; and Pro Se Defendants Stenstrom and Hoopes, who were fulfilling Pennsylvania statutory roles as certified poll watchers and authorized representatives and reported their sworn declarations of election and criminal law violations committed by Plaintiff Savage to the Delaware County District Attorney, Pennsylvania Attorney General, US Attorney for Eastern Pennsylvania, and the US Congress Judicial Committee.
60. Plaintiff's attorney J. Conor Corcoran's gross misconduct specific to his false allegations and testimony regarding threats of violence directly jeopardized the lives, liberty, and property of Pro Se Defendants Stenstrom and Hoopes.
61. Plaintiff's attorney J. Conor Corcoran's harassment, baseless accusations and repeated filings for sanctions against opposing attorneys, and other third party partisan groups financed attempts to disbar any attorney with the temerity to represent anyone associated with President Trump, or election transparency efforts, has left Pro Se Defendants Stenstrom and Hoopes bereft of willing licensed counsel to represent them.
62. Corcoran's demonstrated moral turpitude, willingness to perpetrate fraud and abuse the Courts, and frivolous lawsuits filed to harass and intimidate defendants to enrich himself and his clients is well documented.

63. Without adjudication of censure and sanctions by the Honorable Court, the PDC has no (self-reported) surface area to discipline attorney Corcoran, and there will be further damage to Defendants, the taxpayers of Philadelphia, and abuse of the Court's time.
64. Relief must come in the form of meaningful monetary damages.
65. The Honorable Court has a duty to act and grant appropriate sanctions, for which Pro Se Defendants Stenstrom and Hoopes respectfully request \$50,000 each paid to them by both Plaintiff Savage, and Plaintiff's attorney J. Conor Corcoran, for a total of \$100,000 each, and total sanctions of \$200,000.

Respectfully submitted,



LEAH HOOPES
241 Sulky Way
Chadds Ford, PA 19317
Telephone: 610-608-3548
leahfreedelcopa@protonmail.com
14FEB2023



GREGORY STENSTROM
1541 Farmers Lane
Glen Mills, PA, 19342
Telephone: 856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com
14FEB2023

VERIFICATION

We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Motion for Sanctions are true and correct to the best of our knowledge, information, and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



GREGORY STENSTROM
PRO SE



LEAH M. HOOPES
PRO SE

Dated: 14FEB2023

Pro Se Defendants Gregory Stenstrom and Leah Hoopes

Gregory Stenstrom, Pro Se
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com

Leah Hoopes, Pro Se
241 Sulky Way
Chadds Ford, PA 19317
610-608-3548
leahfreedelcopa@protonmail.com

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE
Plaintiff,

v.

DONALD J. TRUMP,

et al,
Defendants

CASE ID NO.: 211002495

MOTION FOR SANCTIONS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, they caused the foregoing Motion for Sanctions, to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Gregory Stenstrom and Leah Hoopes

Dated: 14FEB2023

**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE

CASE ID NO.: 211002495

Plaintiff,

v.

DONALD J. TRUMP, et al,

Défendants.

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Defendant's Motion for Sanctions, and any response thereto, it is hereby ORDERED and DECREED that said Motion is GRANTED.

Pro Se Defendants Stenstrom and Hoopes shall be paid fifty-thousand US dollars (\$50,000) _____ by Plaintiff Savage, and fifty-thousand US dollars (\$50,000) _____ by Plaintiff's attorney J. Conor Corcoran, for a total of \$100,000 to each Pro Se Plaintiff, and total sanctions in the amount of \$200,000 _____.

BY THE COURT

EXHIBIT A

Complaint #
20230907001
7/20/2023C

J Conor Corcoran did commit misconduct under rule 8.4. As evidenced by his filing of a motion for protective order , in the Philadelphia Court of Common Pleas dated June 6th 2023, against myself Gregory Stenstrom. Mr Corcoran was dishonest , deceitful and acted with illegal and unethical conduct involving moral turpitude. Mr. Corcoran did abuse a legal process and using code Pennsylvania rules of civil procedure #4012 , in the Philadelphia Court system , in order to procure jurisdiction and unattainable relief with full knowledge that this is unlawful and violates many civil and constitutional rights. . Including ,1st , 2nd , 5th , and 8th Amendments of the Federal and Pennsylvania Constitution. Mr Corcoran, knowingly , and fraudulently used a civil process ,during discovery of a civil manner, and sought relief and jurisdiction that is unlawful. Mr Corcoran's repeated misconduct throughout this civil process has been diligently recorded by Ms Hoopes. This repeated behavior was also noted in the civil court hearing dated June 20th 2023, Judge Erdos stated to Mr. Corcoran that he was very concerned that he used this code and attempted to procure jurisdiction and relief. The relief he sought was confiscation of my firearms , to chill my speech , and to excessively fine in the amount of \$15,000. I have never been convicted of a criminal act, there has been no criminal investigation of his allegations and he used a civil court knowing there are no laws, relief and a civil court has no jurisdiction in these matters. According to Disciplinary Rule 1-102 of the Code of Professional Responsibility DR 1-102 Misconduct (a) a lawyer shall not (3) engage in illegal conduct involving moral turpitude (4) engage in conduct involving dishonesty, fraud, deceit, or misrepresentation. This has also effected co defendant Leah Hoopes We also have affidavits from witnesses who attended this court hearing and they are willing to submit them as evidence of this misconduct.

Leah Hoopes

EXHIBIT B

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

Jana M. Palko
Counsel-in-Charge, Central Intake
Frick Building, Ste. 1300
437 Grant Street
Pittsburgh, PA 15219
(412) 565-3173

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisciplinaryboard.org

Intake Counsel

Anna M. Ciardi
Frick Building, Ste. 1300
437 Grant Street
Pittsburgh, PA 15219
(412) 565-3173

Robin B. Godfrey
1601 Market St., Ste. 3320
Philadelphia, PA 19103-2337
(215) 560-6296

Samuel F. Napoli
Frick Building, Ste. 1300
437 Grant Street
Pittsburgh, PA 15219
(412) 565-3173

Dana M. Pirone
820 Adams Ave., Ste. 170
Trooper, PA 19403
(610) 650-8210

Elizabeth J. Rubin
1601 Market St., Ste. 3320
Philadelphia, PA 19103-2337
(215) 560-6296

September 28, 2023

PERSONAL AND CONFIDENTIAL

Leah Hoopes
241 Sulky Way
Chadds Ford, PA 19317

Re: Complaint Against J. Conor Corcoran, Esquire
File Reference #C1-23-695

Dear Ms. Hoopes:

We conducted a review of the complaint you submitted regarding Attorney J. Conor Corcoran. After our review, we dismissed the complaint.

Mr. Corcoran represents the opposing party in a civil matter filed against you and others in the Court of Common Pleas of Philadelphia County. You allege that, in that matter, he engaged in improper litigation conduct.

We reviewed the information which you provided. We also obtained and reviewed the docket of the civil action filed against you. The docket of the civil action reveals no sanction by the Court of Mr. Corcoran for any of the conduct which you allege.

Your allegations must first be addressed in the pending civil action, rather than by this office. It is not the role or function of this office to usurp the functions of the courts making determinations of law or fact in underlying matters. Nor is this office an alternate forum in which to further litigate a case, or appeal or contest any findings that may be made by a court. This office cannot intervene in or interfere with your civil action.

Leah Hoopes
Page Two
September 28, 2023

The docket for the civil action reflects that you are not currently represented by counsel for that matter. We suggest that you contact counsel of your choice, to determine whether and how to proceed in court with regard to any claims you wish to make concerning Mr. Corcoran's conduct. In the absence of any finding by a court of improper conduct by Mr. Corcoran, we cannot pursue disciplinary proceedings based upon the allegations in the complaint.

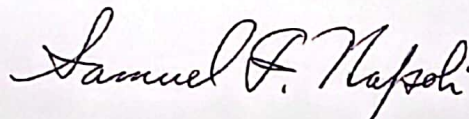
That said, in the event that you obtain a finding by a court that Mr. Corcoran himself engaged in some form of improper conduct relating to your civil action, please feel free to contact us. We will then evaluate the matter in light of the finding of the court.

We do not have a basis to conduct further disciplinary inquiry, as set forth above. For that reason, we dismissed the complaint.

With few exceptions, the attorney disciplinary system is confidential and remains so unless and until formal disciplinary charges are filed by the Office of Disciplinary Counsel against the respondent-attorney with the Disciplinary Board and the respondent-attorney has had the opportunity to answer those charges. The complaint remains confidential.

We appreciate the interest and concern with the legal profession which you showed by bringing this matter to our attention.

Very truly yours,



Samuel F. Napoli
Disciplinary Counsel

SFN/mb

EXHIBIT C

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	
Petitioner	:	
	:	No. ____ DB ____
v.	:	
	:	Atty. Reg. No. 89111
J. CONOR CORCORAN,	:	
Respondent	:	(Philadelphia County)

PETITION FOR DISCIPLINE

Petitioner, Office of Disciplinary Counsel (“ODC”), by Thomas J. Farrell, Esquire, Chief Disciplinary Counsel, and by Michael D. Gottsch, Esquire, Disciplinary Counsel, files the within Petition for Discipline and charges Respondent, J. Conor Corcoran, with professional misconduct in violation of the Rules of Professional Conduct as follows:

1. Petitioner, whose principal office is located at Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, Pennsylvania, is invested, pursuant to Rule 207 of the Pennsylvania Rules of Disciplinary Enforcement (hereinafter "Pa.R.D.E."), with the power and duty to investigate all matters involving alleged misconduct of an attorney

admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of said Rules of Disciplinary Enforcement.

2. Respondent, J. Conor Corcoran, was born on April 11, 1977, was admitted to practice law in the Commonwealth on October 23, 2002, maintains his office at 2601 Pennsylvania Ave., Ste. 501, Philadelphia, PA 19130, and is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.

CHARGE

3. On August 27, 2015, Thomas Siderio (“Siderio”) signed a contingent fee agreement in which he retained Respondent to represent him “concerning my police brutality case against any prospective defendant[.]”

4. The attorney’s fee was 33% of any gross recovery.

5. That agreement pertained to police brutality to which Siderio allegedly had been subjected.

6. That agreement did not pertain to any other legal matter.

7. On March 1, 2022, Siderio's then-12-year-old son, Thomas J. Siderio ("TJ") was shot and killed by a Philadelphia police officer.

8. On March 3, 2022, Respondent, purporting to represent Siderio, Sr. (TJ's father), filed a Writ of Summons naming Siderio "individually, and as Administrator of the Estate of Thomas Siderio" as the plaintiff.

9. Respondent's writ omitted TJ's mother, Desirae Frame.

10. Respondent had not met with or spoken with Siderio before filing the Writ of Summons. Respondent admitted the following in his

DB-7 Statement of Respondent's Position:

... I was unable to communicate with Mr. Siderio on that date, because I have never served as criminal counsel for Mr. Siderio, and therefore was not on SCI Coal Township's lists for approved attorney correspondence, in-person visitation, and/or telephone or Zoom calls as of that date.

I filed the Writ of Summons in the third matter [arising from TJ's death] on March 3, 2022, and the following morning, on March 4, 2022, I drove to SCI Coal Township [where Siderio was an inmate] to attempt direct communication with Mr. Siderio about the third matter [arising from TJ's death] and the

litigation of the same, on behalf of himself and T.J.'s estate.

Upon arrival at the prison, I was informed by the prison guard at the lobby front desk that, as I was not criminal counsel for Mr. Siderio (and therefore not on any attorney visitation list), that I could not speak with Mr. Siderio, and that Mr. Siderio would have to request that I be placed on the attorney visitation list.

* * *

11. Siderio had not retained Respondent with respect to any matters arising from TJ's death.

12. Further, at the time Respondent filed the Writ of Summons, no estate had been raised for TJ and there was no administrator for his estate.

13. Knowing the facts set forth in the two preceding paragraphs, Respondent nonetheless misrepresented to the court that Siderio was the administrator of TJ's estate, and implicitly, that Respondent represented him.

14. Motivated by a desire for attorney's fees that might be garnered from litigation over TJ's death, Respondent rushed to file a

Writ of Summons even though he did not represent Siderio, without obtaining Siderio's authorization or even speaking with him.

15. On March 10, 2022, a week after filing the Writ of Summons, Respondent filed a Petition for Probate and Grant of Letters Testamentary, purportedly on Siderio's behalf, seeking to have Siderio appointed as the sole administrator of TJ's estate.

16. In the section of the Petition where the petitioner is required to attest that "Petitioner(s), after a proper search has/have ascertained that Decedent left no will and was survived by the following spouse (if any) and heirs," Respondent listed only Siderio and omitted TJ's mother, Ms. Frame, even though Respondent was aware of her existence and her right to serve as the administrator, the co-administrator, or to renounce in favor of another.

17. Respondent's Petition for Probate and Grant of Letters Testamentary has never been granted.

18. Following TJ's death, numerous lawyers, including Respondent, Shaka Johnson, Esquire, and others were vying to obtain Siderio as a client in connection with TJ's death.

19. On or about April 22, 2022, Respondent furnished Siderio with a contingency fee agreement that Respondent requested he sign, pursuant to which Siderio would retain Respondent “with regard to any and all investigation(s), negotiation(s) for settlement and/or litigation concerning the murder of my son, T.J. Siderio, against any prospective defendant[.]”

20. That proposed agreement called for an attorney’s fee of 25% of any gross recovery.

21. Siderio never signed that proposed agreement.

22. Siderio informed Respondent orally that he had not called Respondent or hired Respondent to represent him in connection with TJ’s death.

23. Nearly two months after filing the Writ of Summons, purportedly on Siderio’s behalf, Respondent was still *attempting* to secure Siderio as a client.

24. By letter to Shaka Johnson, Esquire dated March 11, 2022, referencing Estate of TJ Siderio v. Mendoza, et al., Phila. C.C.P., March 2022, No. 0587, Respondent stated:

It is my understanding that you have been communicating with my client, Thomas Siderio, during the course of my representation of his interests in the above captioned matter, arising from the death of his son, TJ.

I sincerely hope my understanding is wrong, as I believe such behavior would constitute a violation of *inter alia* Rule 4.2 of the Pa. Rules of Professional Conduct.

Bob Mongeluzzi (who represents the interests of Desirae Frame, TJ's mother) is litigating the matter with me. All interested parties accordingly have the benefit of counsel.

Accordingly, if I am correct, please be advised that if you contact my client, or any members of his family with regard to the above captioned matter any further, I will initiate *inter alia* proceedings with the Disciplinary Board.

25. Thus, in his quest to obtain Siderio as a client in connection with TJ's death, Respondent sent a threatening letter to Johnson in an attempt to intimidate him, misrepresenting his (Respondent's) status, and making multiple false statements.

26. Respondent attempted to deprive Siderio, Respondent's former client, of his right to retain counsel of his own choosing.

27. By letter to Respondent dated May 5, 2022, Siderio stated “There’s multiple lawyers who want this case. 1 lawyer just offered me 20%. ... If you can beat 20% let my dad know, I need you to sign it and it has to state for trial [of] the whole case.”

28. Siderio never entered into a fee agreement with Respondent relating to the death of his son TJ.

29. On or about May 25, 2022, Respondent sent Siderio a Renunciation form for him to sign which would renounce his right to administer TJ’s estate and would designate Kristen L. Behrens, Esquire of Dilworth Paxson LLP as the administratrix of TJ’s estate.

30. Siderio never signed the renunciation that Respondent sent him.

31. By letter dated June 14, 2022, Ronald A. Clearfield, Esquire, informed Respondent that Siderio had retained Clearfield to represent him regarding the death of his son, TJ.

32. Clearfield attached a contingent fee agreement, dated June 2, 2022, signed by Siderio on that date, and notarized, which stated:

I hereby appoint the Law Offices of Ronald A. Clearfield & Associates as my attorneys to prosecute a claim for personal injuries against City of Philadelphia and Edsaul Mendoza or any other parties who shall be liable. The Claimant is Thomas Siderio for an accident/incident that occurred on March 1, 2022.

33. In his June 14, 2022 letter to Respondent, Clearfield further:

- a. informed Respondent that it had come to his attention that despite having no agreement with Siderio regarding representation in connection with TJ's death, Respondent may have taken action on Siderio's behalf;
- b. requested that Respondent cease and desist any and all action, including statements, legal filings, communications with counsel, and communications with any and all defendants; and
- c. requested that Respondent withdraw, without prejudice, the complaint filed under docket number 220300587.

34. The docket number referenced by Clearfield refers to the civil action that Respondent had initiated by filing the Writ of Summons on March 3, 2022, purporting to represent Siderio and TJ's estate.

35. Even if Respondent believed that Siderio had engaged Respondent or would engage Respondent to represent him in connection with TJ's death, Mr. Clearfield's letter to Respondent put Respondent on notice that Respondent was not retained by Siderio and was not authorized to act on his behalf.

36. On June 16, 2022, a case management conference was held, which Respondent attended. Respondent never advised the court that no estate had been raised for TJ or that Siderio had not been appointed as the administrator of TJ's estate.

37. In the civil action, docket number 220300587, Respondent named as the plaintiff "Thomas Siderio, individually and as the Administrator of the Estate of Thomas Siderio."

38. Siderio is not, and never has been, the Administrator of TJ's estate.

39. Respondent was never retained to represent Siderio or TJ's estate and was not authorized by any principal to file the writ of summons.

40. Respondent falsely told Siderio that by virtue of his August 27, 2015 fee agreement with Respondent for his police brutality case, he was under contract with Respondent to represent him in connection with TJ's death.

41. The 2015 contingency fee agreement pertained to the police brutality involving Siderio (which had occurred years before the case involving TJ and his estate).

42. It did not pertain to any other matters.

43. On June 17, 2022, Respondent filed a petition in the Orphans' Court Division of the Philadelphia Court of Common Pleas requesting that the court award a citation to Siderio to show cause why he should not be adjudicated an incapacitated person and have a plenary guardian of his estate appointed.

44. On that same day, Respondent filed a motion to defer case number 220300587 pending the appointment of a guardian for Siderio and to have such guardian substituted as the plaintiff in the case.

45. In that motion Respondent stated: “Plaintiff has been represented by undersigned counsel since 2015 pursuant to a contingency fee agreement (“CFA”) regarding matters including but not limited to police brutality[.]”

46. In the motion to defer, Respondent also asserted, falsely:

Thomas Siderio is believed by Petitioner and other persons who have had contact with him to be suffering from diagnosed and/or undiagnosed cognitive deficits, mental impairments, and/or drug addiction, and/or possibly other physical or mental impairments, which render him incapable of taking effective action with respect to the management of his assets and/or his person. ... Thomas Siderio is unable to manage his legal and financial affairs and property. Thomas Siderio receives oral and written information concerning his affairs assets [sic], but is unable to comprehend and, therefore, to act upon the information due to his condition, which has almost entirely obliterated his cognition and his ability to communicate about the same or his financial or legal affairs.

47. Respondent did not attach any expert medical report to support his claim that Siderio is legally incapacitated.

48. Unless and until there is a court finding of incapacity Siderio is presumed to be competent and is free to select counsel of his choice.

49. Respondent used Siderio's confidential medical information to Siderio's disadvantage.

50. Such information is information relating to the representation or prior representation within the meaning of Pennsylvania Rules of Professional Conduct 1.6(a) and 1.9(c)(1) and (2).

51. Respondent did not obtain Siderio's informed consent to reveal such information.

52. Respondent did not obtain Siderio's informed consent to use such information.

53. Respondent's revealing of such information was not impliedly authorized under RPC 1.6(b) or (c).

54. Respondent's revealing of such information was not necessary to comply with the duties stated in RPC 3.3.

55. Respondent did not reasonably believe that revealing such information was necessary for any purpose stated under RPC 1.6(c).

56. Respondent's use of such information was not permitted or required by the Rules of Professional Conduct.

57. Such information had not become generally known.

58. Respondent knew that Siderio was not incapacitated and was perfectly capable of making his own decisions. Nonetheless, in an attempt to force his representation on Siderio, and to secure the substantial attorney's fees that a case over TJ's death might bring, Respondent betrayed Siderio's (his former client's) trust.

59. Siderio never expressly or impliedly authorized Respondent to disclose, nor consented to Respondent's disclosure of, any alleged impairments or of any disclosure whatsoever of Siderio's medical records.

60. On June 22, 2022, Siderio gave a statement under oath, before a court reporter, in which Siderio stated, *inter alia*, that:

- a. he did not authorize Respondent to file a suit on his behalf arising from TJ's death;
- b. he never retained Respondent to represent him in connection with TJ's death;
- c. Respondent told him that he was under contract with Respondent in connection with TJ's death based on the 2015 fee agreement from Siderio's police brutality case; and
- d. he did not call or hire Respondent; Respondent just showed up at the prison uninvited but Siderio did not meet with Respondent in person.

61. On June 29, 2022, Siderio, who has never been appointed as the administrator of TJ's estate, signed a notarized Renunciation of the right to administer TJ's estate and requested that Letters be issued to Kristen L. Behrens, Esquire.

62. On July 12, 2022, Letters of Administration were granted to Kristen L. Behrens to be the administratrix of TJ's estate.

63. On July 14, 2022, knowing that Siderio was not and never had been the administrator of TJ's estate, that the petition for a grant of letters to him (filed by Respondent) had not been granted, and that Respondent had not been retained and was not authorized to represent Siderio, Respondent nevertheless filed a complaint asserting counts for civil assault and intentional infliction of emotional distress knowingly and falsely asserting that "Plaintiff is the Administrator of the Estate of Thomas Siderio, a/k/a T.J. Siderio"

64. Respondent filed that complaint notwithstanding that lawyers from Saltz, Mongeluzzi & Bendesky, P.C. had warned Respondent against doing so because the complaint contained inaccurate and false information.

65. Further, at the time Respondent filed the complaint, he knew that the Register of Wills had informed him that it would not appoint Siderio as administrator or co-administrator of TJ's estate because Siderio was incarcerated.

66. Respondent verified the complaint under penalty of perjury, subject to 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

67. Further, having knowledge that Ms. Frame, who was separately represented by other lawyers, would not “join” in the complaint because it was an improper filing that contained inaccurate and false information, Respondent nevertheless stated in the complaint: “Plaintiff anticipates that Desiree [sic] Frame, young T.J.’s mother, will join the above captioned matter individually and/or as co-Administrator of the Estate, through the auspices of her counsel, Robert Mongeluzzi and Andrew Duffy of Saltz, Mongeluzzi, & Bendesky, P.C. and/or through a jointly selected third party Administrator, Kristen Behrens of Dilworth Paxson, in the near future”

68. Even though, at a case management conference held on June 16, 2022, the court had ordered that a complaint be filed within 30 days of that date, Respondent has never been authorized by the court, by Siderio, or by the Orphans’ Court to act on behalf of Siderio.

69. Rather than file a complaint that Respondent had no authority to file, Respondent could have withdrawn the summons, dismissed the civil action without prejudice, or sought appropriate relief from the court.

70. On July 15, 2022, Kristen L. Behrens, Esquire, as “Administratrix of the Estate of Thomas Siderio Jr.,” signed a contingent fee agreement/retainer appointing Saltz Mongeluzzi & Bendesky P.C. and the Law Office of Ronald A. Clearfield and Associates, P.C. as attorneys to prosecute, on behalf of TJ’s estate, “a claim for personal injuries and/or civil rights violations against The City of Philadelphia, Police Officer Edsaul Mendoza and any and all other defendants arising out of the death of Thomas Siderio, Jr. on March 1, 2022.”

71. On July 19, 2022, Respondent filed a motion to disqualify and remove the Law Offices of Ronald A. Clearfield & Associates, Saltz Mongeluzzi & Bendesky, P.C., and Kristen Behrens, Esquire in case number 220300587.

72. Respondent had no legal or factual basis to seek the disqualification of Ms. Frame's or Ms. Behrens's choice of attorneys.

73. In that motion, Respondent made numerous false assertions, including that he represented Siderio in the matter, and also revealed medical information that Respondent obtained in the course of his prior representation of Siderio, paragraphs 19-22 of the motion and Exhibit H thereto (attaching medical records of Siderio).

74. On July 22 2022, Orphans' Court Judge Stella M. Tsai dismissed Respondent's petition to have Siderio declared an incapacitated person.

75. In her opinion accompanying her dismissal order, Judge Tsai recounted the contents of Siderio's May 5, 2022 letter to Respondent, and then noted that: on June 6, 2022, Siderio signed a contingent fee agreement with the Law Office of Ronald A. Clearfield & Associates to represent him in TJ's case; on June 14, 2022, the Law Office of Clearfield & Kofsky sent Respondent a cease and desist letter advising him that they were representing Siderio in TJ's case and requesting that Respondent take no further action in the matter; three

days later, on June 17, 2022, Respondent filed his petition asking the court to adjudicate Siderio an incapacitated person and to have a plenary guardian of his estate appointed.

76. In dismissing Respondent's petition, Judge Tsai stated that "[t]he primary evidence cited by [Respondent] to demonstrate Mr. Siderio's alleged incapacities are his conclusory assertions to that effect. Notably, there is no medical evidence or other reliable expert evidence presented to support the Petition." Opinion at 6.

77. She further stated:

[Respondent's] own exhibits undermine his showing that Mr. Siderio is incapacitated. Mr. Siderio's May 5, 2022 letter to [Respondent] is clear and cogent. Mr. Siderio is aware that other lawyers are interested in representing him in the corollary civil action [over TJ's death], he lists several reasons why he is entertaining other offers of representation, and he even allows [Respondent] the chance to make him a better offer. Far from "obliterated" cognition [as Respondent alleged], Mr. Siderio exhibits "comprehension of the nature of his currently pending litigation." Beyond this, [Respondent] lends credence to the substance of Mr. Siderio's letter (and therefore, Mr. Siderio's capacity) by relying on it himself as evidence of

third-party interference with his representation of Mr. Siderio in the corollary civil action. ...

... With scant, if any, evidence that Mr. Siderio is in fact incapacitated within the meaning of the law, [Respondent's] overarching concern over the disruptive effect of "vexatious efforts," "tortious interference," and "poaching" has little, if anything, to do with an adjudication of Mr. Siderio's capacity, but rather further indicates that [Respondent] filed this guardianship proceeding to preserve his role in the corollary civil action. ...

Given the factual record presented in the Petition, the Petition is demonstrably incomplete and fails to provide sufficient facts to proceed and is not instituted to benefit Mr. Siderio.

78. On July 25, 2022, Respondent filed a praecipe to withdraw his appearance in the civil action he had filed naming Siderio as the plaintiff (March 2022 No. 587, Case ID 220300587). Respondent noted that Siderio was being represented by other counsel who had entered their appearance on June 23, 2022.

79. By order dated August 15, 2022, Respondent's motion to disqualify and remove the other lawyers was denied.

80. On March 7, 2023, Respondent sent an email to Ron Clearfield, Andrew Duffy, and Mark Schiavo (of Dilworth Paxson LLP), with copies to Robert Mongeluzzi, Ben Hoffman (of Clearfield & Associates), Kristen Behrens, and Anthony Lopresti (of Clearfield & Associates), stating:

Dear Ron, Andrew and Mark:

I'm considering a lawsuit against your respective firms for claims of tortious interference, breach of contract, and civil conspiracy, arising from the TJ Siderio case.

81. On information and belief, Respondent has never filed the threatened lawsuit.

82. By his conduct as alleged in Paragraphs 3 through 81 above, Respondent violated the following Pennsylvania Rules of Professional Conduct:

a. RPC 1.2(a), which states that "Subject to paragraphs (c) and (d), a lawyer shall abide by a client's decisions concerning the objectives of representation and, as required by Rule 1.4, shall consult with the client as to the means by which they are to be pursued. A

lawyer may take such action on behalf of the client as is impliedly authorized to carry out the representation. ...”

b. RPC 1.6(a), which states that “A lawyer shall not reveal information relating to representation of a client unless the client gives informed consent, except for disclosures that are impliedly authorized in order to carry out the representation, and except as stated in paragraphs (b) and (c);

c. RPC 1.6(d), which states that A lawyer shall make reasonable efforts to prevent the inadvertent or unauthorized disclosure of, or unauthorized access to, information relating to the representation of a client;

d. RPC 1.9(c)(1), which states that a lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter use information relating to the representation to the disadvantage of the former client except as the Rules of Professional Conduct would permit or require with respect to a client, or when the information has become generally known;

e. RPC 1.9(c)(2), which states that a lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter reveal information relating to the representation except as the Rules of Professional Conduct would permit or require with respect to a client;

f. RPC 3.1, which states that a lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous, which includes a good faith argument for an extension, modification or reversal of existing law;

g. RPC 3.3(a)(1), which states that a lawyer shall not knowingly make a false statement of material fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

h. RPC 4.1(a), which states that in the course of representing a client a lawyer shall not knowingly: (a) make a false statement of material fact or law to a third person;

i. RPC 8.4(c), which states that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation; and

j. RPC 8.4(d), which states that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

WHEREFORE, Petitioner prays that your Honorable Board appoint, pursuant to Rule 205, Pa.R.D.E., a Hearing Committee to hear testimony and receive evidence in support of the foregoing charges and upon completion of said hearing to make such findings of fact, conclusions of law, and recommendations for disciplinary action as it may deem appropriate.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

Thomas J. Farrell
Chief Disciplinary Counsel

By: Michael D. Gottsch

Michael D. Gottsch
Disciplinary Counsel
Attorney Registration No. 39421

1601 Market Street
Suite 3320
Philadelphia, PA 19103
(215) 560-6296


BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	
Petitioner	:	
	:	No. ____ DB ____
v.	:	
	:	Atty. Reg. No. 89111
J. CONOR CORCORAN,	:	
Respondent	:	(Philadelphia County)

VERIFICATION

I verify that the statements made in the foregoing Amended Petition for Discipline are true and correct to the best of my knowledge or information and belief. This statement is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

12/7/23
Date



Michael D. Gottsch
Disciplinary Counsel

CERTIFICATE OF COMPLIANCE

I certify that this Petition for Discipline, in No. C1-22-470, 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.

Submitted by: Office of Disciplinary Counsel

Signature: Michael D. Gottsch

Name: Michael D. Gottsch, Disciplinary Counsel

Attorney No. (if applicable): 39421

EXHIBIT D

Attorney J. Conor Corcoran's Allegation



J. Conor Corcoran photo from professional LinkedIn profile

“Defendants Stenstrom and Hoopes have engaged in a repeated pattern of threatening (*sic*) to use explosives against this Honorable Court and/or the Plaintiff and/or the Plaintiff’s undersigned counsel, in order to achieve their litigation and/or political objectives.”

–Attorney J. Conor Corcoran, 2023
*“Good citizens don’t obey bad laws.”*TM

04 January 2021

FROM:

Gregory Stenstrom (Observer) and Leah Hoopes (Bethel Township Committeewoman),
Delaware County, Pennsylvania

TO:

William M. McSwain; U.S. Attorney
U.S. Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

Josh Shapiro; Pennsylvania's Attorney General
Pennsylvania Office of Attorney General Strawberry Square; 16th Floor
Harrisburg, PA 17120

Jack Stollsteimer; District Attorney
Office of the District Attorney
Delaware County Courthouse
201 W. Front Street
Media, PA 19063

SUBJECT: Investigation of Election Fraud and Election Law Violations

It is a matter of public record that Philadelphia and Delaware Counties did not allow observers to be present during opening and counting of mail-in and absentee ballots, and canvassing and resolution of ballots on Election Day, Tuesday, 03 November through Friday, 06 November 2020, resulting in multiple allegations of election fraud.

On Saturday 07 November, the day for Provisional Ballot Resolution, Gregory Stenstrom either contacted you personally and directly, or indirectly through your offices (all CC's), requesting you investigate these matters.

On Tuesday, 17 November 2020, Pennsylvania AG Special Agents Ben Walton and Aidi Marcial came to our homes, and multiple other witnesses, unannounced at the direction of PA AG Josh Shapiro to "investigate 'you' (the witnesses) regarding election fraud."

During those interviews, the agents were informed we had, in fact, been in contact with multiple law enforcement agencies, and had pleaded with them to investigate, and at a minimum, preserve forensic evidence at the Wharf Center, Seaport Ave, City of Chester (Delaware County), PA to include preservation of chain of custody sheets, computer images of the voting tabulation workstations, video, building entry logs, USB v-cards, and ballots.

To our knowledge, no investigation was performed, nor was any attempt made to preserve evidence, much of which has since been wantonly destroyed, altered, or "lost," despite statutory requirements for Delaware County and Delaware County Board of Elections officers to maintain said evidence, and notice to those government entities via multiple filings (in excess of 55 petitions and law suits) before the Commonwealth of Pennsylvania Supreme Court and US Supreme Court, that would require preservations of said election related digital media and paper documents.

On Wednesday, 25 November 2020, we testified before the special panel of the PA Legislature in Gettysburg, PA before several dozen members of the legislature, which was broadcast live by every mains stream media outlet, live-streamed worldwide, viewed by millions of viewers, and tweeted by the President of the United States. We testified of irregularities, potential fraud, and broken chain of custody for 120,000 ballots, and the inability to certify 320,000 ballots, in an election with a margin of difference of 80,000 ballots.

On Tuesday, 01 December 2020, US Attorney General Barr inexplicably announced, "to date, we have not seen fraud on a scale that could have effected a different outcome in the election." How could such a statement have been made inferring there was an investigation, when said investigation never occurred?

We have been contacted by thousands of people from the County, Commonwealth, United States, and around the World supporting our efforts to provide transparency and investigate the

Stenstrom and Hoopes Disclosure to USDOJ as Federal Witnesses

irregularities, and allegations of criminal fraud, with the most common question being "where is law enforcement?"

We have also been contacted by dozens of Delaware County employees, election observers, election judges, minority inspectors, and citizens – who all observed fraud and irregularities – that had also directly contacted your offices, and the Federal Bureau of Investigation (FBI), and documented those contacts – all similarly with no response.

With each passing critical election milestone date (certification by County, State and Electoral College), your offices and law enforcement have remained mute, and perceptibly impotent.

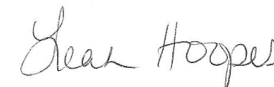
This letter is official notice that we have exhausted all administrative remedies available to us, and the citizenry, that law enforcement perform their duties to investigate the election fraud allegations described herein, in a timely manner.

Be advised that we are considering filing for mandamus to force you to perform your sworn duties and investigate these allegations.



Gregory Stenstrom
1541 Farmers Lane
Glen Mills, PA 19342

04 January 2021



Leah Hoopes
241 Sulky Way
Chadds Ford 19317

04 January 2021

USPS Receipts for Defendants US DOJ

Disclosure

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OFFICIAL USE

Certified Mail Fee \$3.55

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<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$1.00

Total Postage and Fees \$4.55

Sent To _____

Street and Apt. No., or PO Box No. _____

City, State, ZIP+4® _____

PS Form 3800, April 2015 PSN 7530-02-000-9017 See Reverse for Instructions

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JAN 05 2021

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OFFICIAL USE

Certified Mail Fee \$3.55

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$1.00

Total Postage and Fees \$4.55

Sent To _____

Street and Apt. No., or PO Box No. _____

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Objection to Attorney Corcoran Motion

- Plaintiff improperly cites 231 Pa. Code § 4012 as Discovery authority.
- Plaintiff has failed to state a claim upon which relief can be granted.
 - Federal Rules of Civil Procedure Rule 12(b)(6)
- Plaintiff Attorney has abused the Court and violated
 - Pa.R.P.C. Rule 3.1. Meritorious Claims and Contentions
 - Pa.R,P.C. Rule 3.3. Candor Toward the Tribunal
 - Pa.R,P.C. Rule 3.4. Fairness to Opposing Party and Counsel
 - Pa.R.C.P. Rule 4.1. Truthfulness in Statements to Others
 - Pa.R,P.C. Rule 8.4. Misconduct
 - Pa.C.P.R. Disciplinary Rule. 1-102 (DR-1-102). Misconduct. (Code of Professional Responsibility)
- “An attorney "for the plaintiff cannot admit evidence into the court. He is either an attorney or a witness".
 - Trinsey v. Pagliaro D.C.Pa. 1964, 229 F. Supp. 647

Election Rights – Alleged “incendiary” speech



“The Constitution provides three ways to change our Republic, the jury box, the ballot box, and the powder box.”

“If we don’t fight in the jury box to protect our ballot box, our families, our loved ones, and our friends will have to suffer the pain of the powder box.”

“Once a ballot comes out of an envelope, it’s a fired bullet.”

– Gregory Stenstrom and Leah Hoopes, 2020-23

“The Boxes of Liberty”

Are a metonymy and metaphorical device that has been used by educated people and orators in context of social transformation.

Soap Box – 1A; Free Speech

Ballot Box - Elections

Jury Box - Courts

Powder Box - War

Cartridge Box – 2A; Arms

Band – Special Interests

Print Box - Newspapers

Tobacco Box – “Vice” (tax)

Lunch Box – Social Welfare

Contribution Box - Donations



1830’s – Steven Decatur Miller

1860’s – Frederick Douglas

1840’s-70’s – Susan B. Anthony

1880’s – Elizabeth Cady Stanton

1960’s – Martin Luther King

1960’s – Malcolm X

1970’s – Harvey Milk

2020’s – Gregory Stenstrom and Leah Hoopes

Equal Rights - The Abolition of Slavery

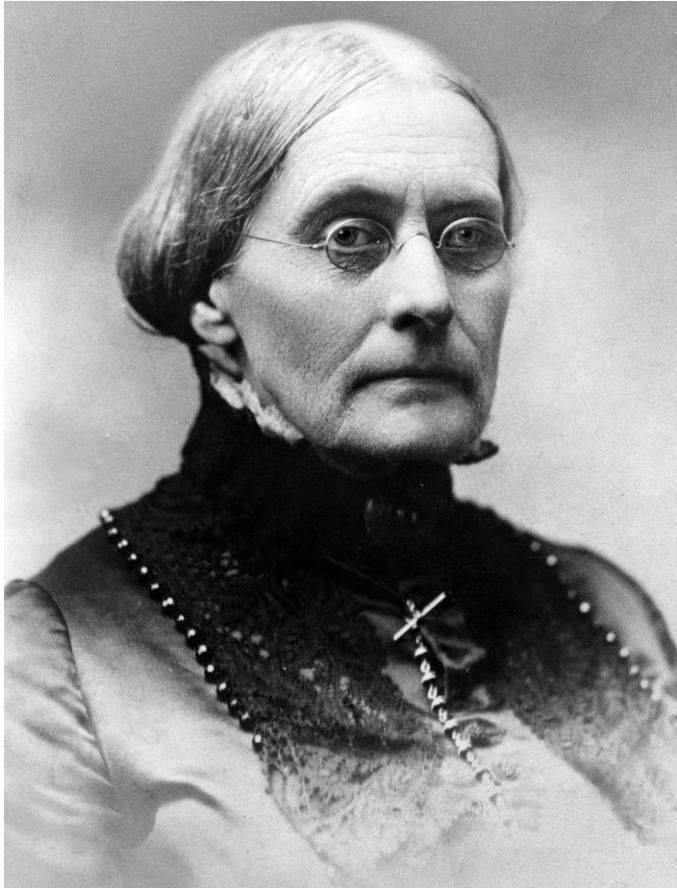
“A man's rights rest in three boxes. The ballot box, jury box and the cartridge box. Let no man be kept from the ballot box because of his color. Let no woman be kept from the ballot box because of her sex.”

-- Frederick Douglas, November 15th, 1867, speech in New Jersey, reported by Tennessee Star

[Link to video/audio recreation of speeches min 8:25](#)



Women's Rights - Suffrage



[Susan B. Anthony](#) (audio link)

“(Women are equal)... in all privileges and immunities, save those of the jury box and ballot box, the two fundamental privileges on which rest all the others.” – Susan B Anthony, 1972, Speech Tour, "Is it a Crime for a Citizen of the United States to Vote?"

Suffragists frequently used the “Boxes of Liberty” in their speeches and correspondence.

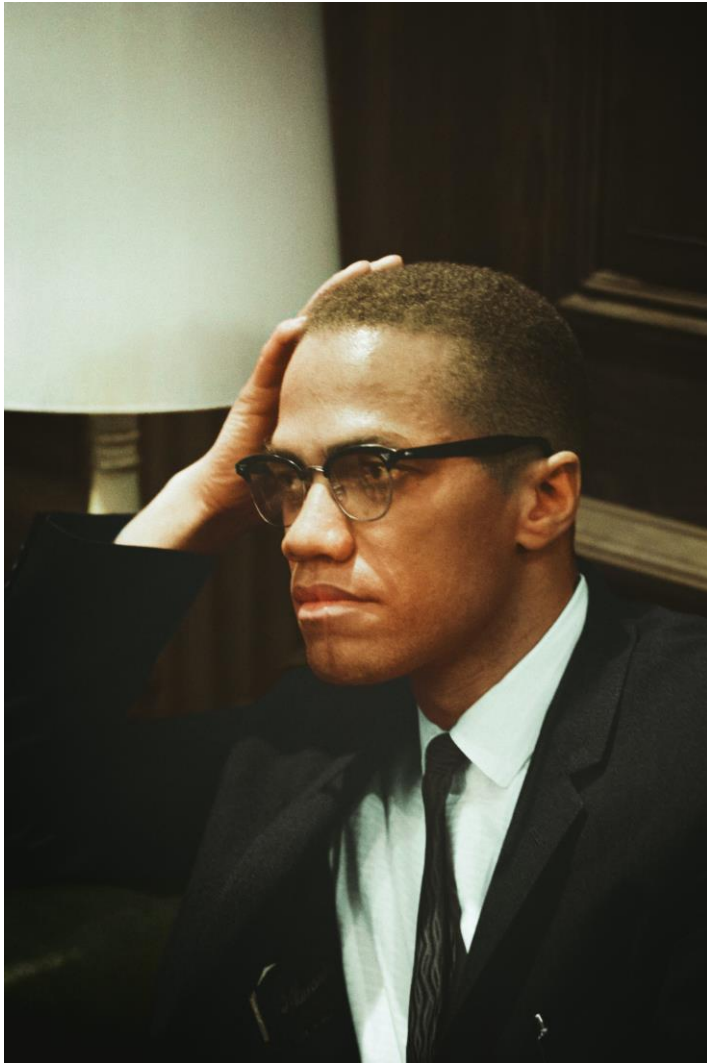


[Elizabeth Cady Stanton](#) (audio link)

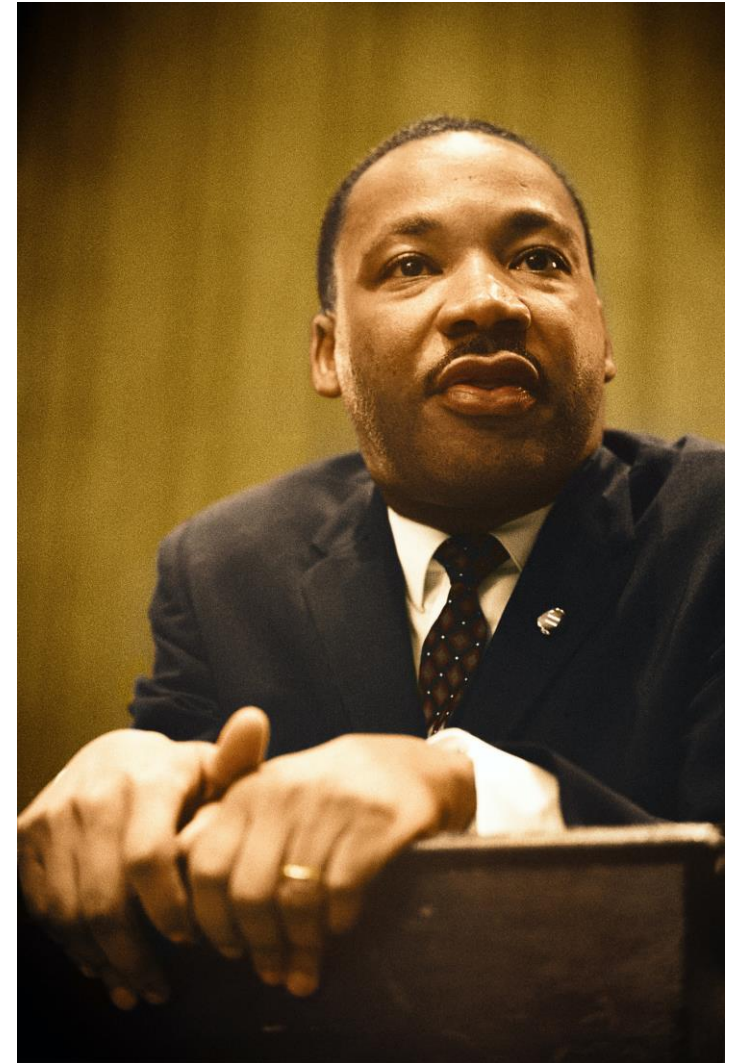
Civil Rights

Among Martin Luther King's most famous speeches was 1966's *"Let Us March on the Ballot Boxes"* (audio)

and Malcolm X's, 1964, *"The Bullet or the Ballot"* (audio)



Malcolm X



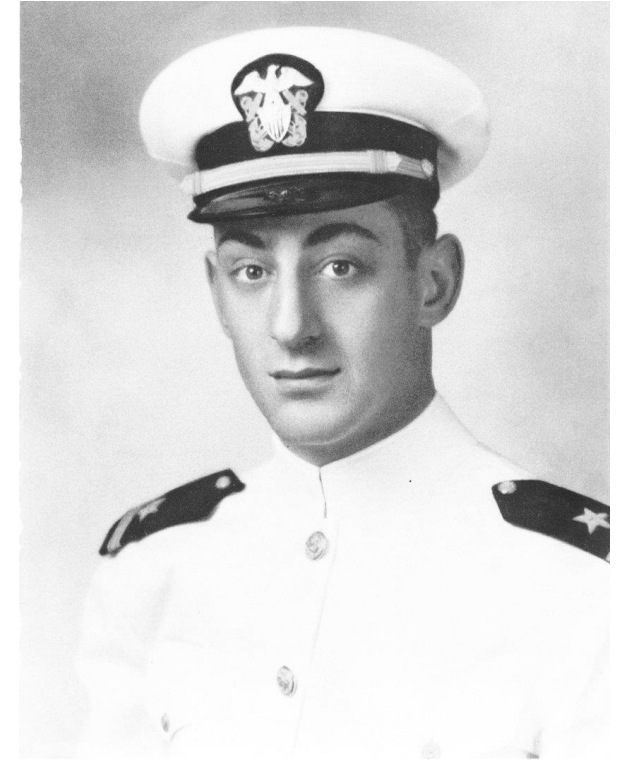
Martin Luther King

Gay Rights and/or Homosexual Rights

“The Declaration of Independence says, ‘All men are created equal, and they are endowed with certain inalienable rights’ ‘Our National Anthem says: ‘Oh, say does that Star-Spangled Banner yet wave over the land of the free.’ ‘No matter how hard you try, you cannot erase those words, you cannot chip those words off the base of the Statue of Liberty, and you cannot sing the Star Spangled Banner without those words.”

“That’s what America is. Love it or leave it.” (audio link)

- Harvey Milk, Gay Freedom Day Speech, San Francisco, 1978



Attorney Corcoran Media Placements on Case

The Legal Intelligencer



RAWSTORY

POLITICO

DAILY TIMES

salon

AlterNet



The Philadelphia Inquirer



DAILY BEAST



Attorney Corcoran Public Media Statements

Savage's attorney, Conor Corcoran, used Giuliani's deposition in his own legal filing, pointing to statements by Giuliani acknowledging that he had an obligation to verify information before sharing it (Slate)

“In this particular instance they all got together and planned that piece of political theater to produce that specific piece of defamation against my guy and I think that's why Trump and Giuliani are on the hook too,” Corcoran said. “That's why there's a civil conspiracy count here too: because they planned this.” – Corcoran, Slate

“It's clear that they set up Stenstrom to propagate that lie,” Corcoran told me

“All Defendants herein knew that such fraud was impossible,” Savage's attorney argues.

“Stop Pro-Trump Poll Watchers' Threats”
Pa. Court Told. Conor Corcoran, Law360

“They put him in the hospital twice. They gave him two heart attacks and damn near killed him,”
Corcoran told The Daily Beast.

Federal Witness Intimidation Violations

Intimidation: “means a serious act or course of conduct directed at a specific person that- (i) causes fear or apprehension in such person; and (ii) serves no legitimate purpose [**18 USC §1514(d)(1)(D)**]

- **Course of Conduct:** “means a series of acts over a period of time, however short, indicating a continuity of purpose” [**18 USC §1514(d)(1)(A)**]
- **Harassment:** “means a serious act or course of conduct directed at a specific person that- (i) causes substantial emotional distress in such person; and (ii) serves no legitimate purpose [**18 USC §1514(d)(1)(B)**]
- **Serious Act:** means a single act of threatening, retaliatory, harassing, or violent conduct that is reasonably likely to influence the willingness of a victim or witness to testify or participate in a Federal criminal case or investigation [**18 USC §1514(d)(1)(F)**]

Violations of US Law

- **RIGHTS DEPRIVATION UNDER COLOR OF LAW [18 USC § 242]:** Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States.
- **RIGHT OF HONEST SERVICE (*Honest Service Fraud*) [18 USC § 1346]:** “For the purposes of this chapter, the term “scheme or artifice to defraud” includes a scheme or artifice to deprive another of the intangible right of honest services.”
- **PROTECTED DISCLOSURE [5 CFR § 1209.4(b)]:** a formal or informal communication or transmission, but does not include a communication concerning policy decisions that lawfully exercise discretionary authority, unless the employee or applicant providing the disclosure reasonably believes that the disclosure evidences any violation of any law, rule, or regulation, gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety.
- **PROHIBITED PERSONNEL PRACTICE (8)/PROHIBITED PERSONNEL PRACTICE (9):**
 - Allegations of reprisal “based upon disclosure of information” [**5 USC §2302(b)(8)**]
 - Allegations of reprisal “based upon one’s right to complain” [**5 USC § 2302(b)(9)**]

Violations of US Law

- **Criminal Coercion:** (a) A person is guilty of criminal coercion if, with purpose to unlawfully restrict another's freedom of action to his or her detriment, he or she threatens to: (1) Commit any criminal offense; or (2) Accuse anyone of a criminal offense; or (3) Take or withhold action as an official, or cause an official to take or withhold action. (b) Criminal coercion is classified as a misdemeanor. [(Bureau of Indian Affairs) 25 CFR §11.406(a)]

The Proposed Order Against Stenstrom and Hoopes

- Muzzles and Silences Defendants from exercising their 1st Amendment Rights.
- Attempts to deny Defendants' 2nd Amendment rights as punishment to Defendants for exercising their 1st Amendment Rights.
- Attempts to punish Defendants by limiting their free movement within their County.
- “Forbids” Pro Se Defendants from effectively defending themselves in the People’s Court without leave of lawyers and judges.
- Singles the Defendants out for punishment for questioning the abuse of the courts and privileges inequitably afforded to a private interest and/or special affinity class.
- Intimidates the Defendants so they will not question false claims against them.
- Asymmetrically inflicts crushing financial fines as punishment on Defendants via abuse of the People’s Court and the judicial system.
- Intentionally violates Defendants’ fundamental rights via legal coercion and intimidation designed to change the policy of the government from transparency and accountability.
- Attempts to weaponize the judicial system to coerce and intimidate the Defendants to not execute their duties, rights, and responsibilities before the Court.

EXHIBIT E

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

ORDER

AND NOW, this _____ day of _____, 2023, upon consideration of the Plaintiff's Motion for a Protective Order, and any response thereto, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**; and,

Defendants Gregory Stenstrom and Leah Hoopes are hereby **ORDERED** as follows: they shall not make any further public statements about the Plaintiff; Plaintiff's counsel; any judge, party and/or witness in the above captioned matter; the merits of any claim or defense in the above captioned matter; and/or are absolutely forbidden from using, or making any direct or indirect threats of the use of, any firearms, explosives, a powder box, violence, or any allusions thereto whatsoever; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall refrain from any direct or indirect contact with the Plaintiff or Plaintiff's counsel via any form of telephone, electronic, written and/or or postal correspondence, save for the exchange of any discovery material via e-mail, and/or filings via the Court's e-filing system; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall surrender any and all weapons and/or incendiary material and/or devices in their possession to the Sheriff of either Philadelphia or Delaware County, bearing any and all costs therefor, and are otherwise forbidden from possessing any weapons and/or incendiary material or devices until both the conclusion of the above captioned matter, and upon further application to this Court; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall stay away from the Plaintiff, Plaintiff's counsel, and any judge, party and/or witness in the above captioned matter, at a distance of no less than one (1) mile at any and all times, until both the conclusion of the above captioned matter, and upon further application to and/or Order of this Court; and,

Defendants Gregory Stenstrom and Leah Hoopes are hereby **SANCTIONED** and **ORDERED** to pay attorney's fees in the amount of \$15,000 (Fifteen Thousand Dollars) pursuant to 42 Pa.C.S.A. § 2503 within the next thirty (30) days; and,

It is hereby **ORDERED** and **DECREED** that any violation of the terms of this Order shall result in a hearing for civil contempt, upon further application to this Court.

BY THE COURT:

_____ J.

Program Type: Major Jury
Discovery Ends: August 7, 2023

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

**OCTOBER TERM, 2021
No. 2495**

v.

Donald J. Trump, et. al.,

Defendants.

RULE TO SHOW CAUSE

And now, this _____ day of _____, 2023, a rule is hereby issued upon Defendants Gregory Stenstrom and Leah Hoopes to show cause why the attached Order should not be entered against them.

A hearing regarding the same shall be held on _____, 2023, at _____ .m., in City Hall _____ and/or via virtual hearing on Zoom, per future Order of the Court.

BY THE COURT:

J.

LAW OFFICE OF J. CONOR CORCORAN, P.C.

J. Conor Corcoran, Esquire

Identification No. 89111

2601 Pennsylvania Avenue

Suite 501

Philadelphia, PA 19130

T: (215) 735-1135

F: (215) 735-1175

E: conor@jccesq.com

Attorney for Plaintiff

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

OCTOBER TERM, 2021

No. 2495

v.

Donald J. Trump, et. al.,

Defendants.

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Plaintiff, by and through his undersigned counsel, the Law Office of J. Conor Corcoran, P.C., respectfully submits this Motion for a Protective Order, and in support thereof avers as follows:

1. The above captioned matter concerns *inter alia* defamation injuries inflicted by Defendants Gregory Stenstrom and Leah Hoopes, beginning on or about November 25, 2020, and a true and correct copy of the pending Complaint is attached hereto and incorporated herein as Exhibit A.
2. As reflected on the docket, Defendants Stenstrom and Hoopes filed their Answer to the Plaintiff's Complaint on May 23, 2022, and said Defendants subsequently discharged their attorney, Thomas J. Carroll, whereupon this Honorable Court entered an Order on October 31, 2022 (docketed November 9, 2022) allowing said Defendants to proceed *pro se* in the above captioned matter.
3. Since the entry of that Order, Defendants Stenstrom and Hoopes have engaged in a repeated pattern of threatening to use explosives against this Honorable Court and/or the Plaintiff and/or the Plaintiff's undersigned counsel, in order to achieve their litigation and/or political

objectives in the above captioned matter, culminating with said Defendants most recent claims that undersigned counsel and the Honorable Daniel Anders are conspiring, as gay activists, to manipulate the proceedings in the above captioned matter, as further set forth *infra* at length.

4. On December 2, 2022, Defendant Stenstrom published a statement on his personal blog¹, announcing his intentions as follows:

“The Constitution provides three ways to change our Republic, the jury box, the ballot box, and the powder box.

If we don’t fight in the jury box to protect our ballot box, our families, loved ones, and friends will have to suffer the pain of the powder box.”

A full and complete transcript of Defendant Stenstrom’s remarks in this regard, and others as set forth *infra*, is attached hereto and incorporated herein as Exhibit B.

5. On December 7, 2022, Defendant Stenstrom published the following statement on his personal blog², summarizing an interview Defendants Stenstrom and Hoopes conducted with Steve Bannon on Friday, December 2, 2022 (and providing a copy of the video thereof), to wit:

“Our second appearance on Friday, 02Dec on Steve Bannon’s ‘War Room’ was a bit meatier than our first abbreviated appearance on Wednesday, 30Dec, and included a report on the situation in Brazil, which is where we may be heading if we can’t sort this out in our Courts. Our goal is to keep this in the realm of the jury box, to solve the problems with the ballot box, and not have to resort to the powder box. Stay in the fight.”

Video transcript:

(00:00) Steve Bannon: “Greg Stenstrom and Leah Hoopes and we’ve had them on a number of times, guys we’re gonna have about ten minutes, I just want you to take us through, you guys take it walk through what the book is about but particularly what you found about the corruption in the stealing of the election in 2020 in Delaware County...(3:26)...Brazil’s on the brink essentially about the machines...when you say on a mass basis, they substitute votes for the ballots they created, number one walk me through how they substituted it and then number two how they actually created their own ballots. Greg, why don’t you do that, just tell me how they substituted it, and how they created their own.”

(03:54) Gregory Stenstrom: **“First of all, this is grand mal corruption that’s centrally controlled, and it is a national conspiracy, and it’s highly targeted. They target specific counties. 32 counties control basically at a mass level the**

¹ <https://patriot.online/@gregorystenstrom/posts/AQDXESoTTcwANHMYYy>

² <https://patriot.online/notice/AQMGjoRrlmDPhQ7oQa>

3200 other counties in the country. **At that level what they do is they bring in hundreds of thousands, millions of fake ballots that they create from actual voter rolls, which they then scrub...** and then what they did in the central counting centers, which you saw everywhere – Antrim, Philadelphia, Delaware County, DeKalb County, Fulton County – then they don't let you get near the ballots. The reason they do that is because they can't let you see them. **They run them through the machines and once that ballot comes out of an envelope, it's a fired bullet.** (05:02.)”

See Exhibit B.

6. On March 14, 2023, Defendant Stenstrom made his most recent confession of considering the use of explosives, during Defendants Stenstrom and Hoopes' mutual appearance on an interview with Roger Stone³, whereupon Defendant Gregory Stenstrom agreed to the suggestion that he had no confidence in the judicial system, and that a solution to that problem was the employment of explosives, to wit:

(35:05) Roger Stone: “So I guess here is the question cause obviously you paint a very draconian picture, certainly a downbeat interview in terms of the inherent corruption and unfairness of the system. We know we were raised to believe that the judicial branch of the government was non-political, that it was fair, that it was based on equal justice, that the purpose of the courts were to get to and to and underline the truth, **but as you and I agreed this weekend, neither one of us has much confidence in the judicial system. You presented an open and shut case, you've documented everything you've said here today, yet it particularly authorities in the states of Pennsylvania who had a legal requirement to conduct an investigation and take action and have done nothing whatsoever, Greg what's the solution? Is there a solution? Other than prayer?**”

Gregory Stenstrom: “**Well there is, there is a solution.** I think one of the reasons you and I hit it off when we met, and also you mentioned President Trump, the magic of President Trump and the experience you brought to elections, and what bonds Leah and myself, is that we're in the voting business, we're in the citizenry business, we're in the republic business. **We want – you know, you can conver – you can change the country from the soap box, the ballot box, the jury box, and the powder box (explosive enumeration with fingers)** and what we've been involved in is hearts and minds, voters, the misanthropes...(whereupon he goes into his ant analogy attacking one another in a jar)...we identify the misanthropes, you already identified them in your book about Bush, and then we go after the legislation that gave them the power to do

³ <https://frankspeech.com/video/stonezone-gregory-stenstrom-leah-hoopes-authors-parallel-election>

this, and then we're gonna find our way home, and that's just the starting point. That's the close on that question."

See Exhibit B.

7. Finally, on May 17, 2023, Defendants Stenstrom and Hoopes appeared in a video interview on the CannCon podcast⁴, whereupon Defendant Stenstrom said that undersigned counsel for the Plaintiff was conspiring with the Honorable Daniel Anders of the Court of Common Pleas of Philadelphia County, as homosexual activists, in order to manipulate the proceedings in the above captioned matter, and compared undersigned counsel and Judge Anders to drag queen performers who expose themselves to children, and deserving of being attacked, to wit:

(01:31:03) Gregory Stenstrom: "Now if we only have time to talk about the election, we focus on that. But the bigger picture, Brian, and Leah was talking about it, is **these people are taking over the country one thing at a time**. Now I can't, I can't even say the word transgender. You know, we used to, you know, I can't even say anything. Well I do, I don't care. **I can't say anything in our lawsuit, we, you know we had a problem with, uh, you know we had a problem with uh what looks like a, like a group of you know gay um activists who are in the, in the court. And we just said, hey, look it. You know, the judge, the lawyer that's suing us is the first gay divorce attorney in the country, and the judge he's putting everything to is the first gay judge openly gay judge in Philadelphia. So I said well we're sitting here in one part of the court, we're going through the motions, and all of a sudden this guy shifts it over you know to this venue in the court. So what happens is, people are afraid to say anything...they're afraid of saying the obvious. It's like you know like these drag queens in in in elementary schools. People are afraid of saying why is that freak show you know waiving his ass, and doing the most lewd things in front of children, and no one is tackling him.** And everyone is oh geez you know we can't say anything. We can't say anything about the election, I don't want to be an election denier, I don't want to say anything about transgender, I don't want to say anything about potentially offending somebody about gay rights...(1:34:21) This is what we're dealing with. And if we don't start addressing these things – take care of your health, get your tests from Immunoprofile(.com), you know go to Patriot.Online, donate to us, learn you know it's a great social media platform, go to the ParallelElection.com, buy the book..."

See Exhibit B.

⁴ <https://rumble.com/v2od4t2-live-at-9pm-with-greg-stenstrom-and-leah-hoopes-on-their-active-pa-2020-law.html>

8. Some and/or all of these suggestions of violence, as set forth *supra*, have been stated or promoted by Defendants Stenstrom and/or Hoopes in the pursuit of selling their self published book about the above captioned matter and the 2020 election, entitled The Parallel Election⁵.

9. Pa.R.C.P. 4012 provides that the Plaintiff may request a protective order from the Court, such as that being requested herein, as “justice requires to protect a party or person from unreasonable annoyance...oppression, burden, or expense” and which is warranted by the aforementioned statements and publications from Defendants Stenstrom and Hoopes, suggesting as they do the employment of explosives to achieve their litigious and political goals, specifically identifying undersigned counsel, and the Hon. Daniel Anders, as conspiratorial gay activists who are deserving of violent repercussions.


10. 42 Pa.C.S.A. § 2503 provides that attorney’s fees may be awarded where, as here, Defendants Stenstrom and Hoopes have engaged in dilatory, obdurate or vexatious conduct during the pendency of a matter, and the aforementioned actions of Defendants Stenstrom and Hoopes have consequently preoccupied in excess of thirty (30) hours of undersigned counsel’s time, including but not limited to filing reports with the Federal Bureau of Investigation, and the Attorney General’s Office.

WHEREFORE, Plaintiff respectfully requests entry of the attached Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: June 6, 2023



J. Conor Corcoran, Esquire
2601 Pennsylvania Avenue
Suite 501
Philadelphia, PA 19130
Phone: (215) 735-1135
Fax: (215) 735-1175
Email: conor@jccesq.com

⁵ See The Parallel Election, © 2022 by Gregory Stenstrom and Leah Hoopes, published by Interrita Publishing, ISBN Nos. 978-1-958682-29-6, 978-1-958682-28-9, and 978-1-958682-27-2.

LAW OFFICE OF J. CONOR CORCORAN, P.C.

J. Conor Corcoran, Esquire

Identification No. 89111

2601 Pennsylvania Avenue

Suite 501

Philadelphia, PA 19130

T: (215) 735-1135

F: (215) 735-1175

E: conor@jccesq.com

Attorney for Plaintiff

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

OCTOBER TERM, 2021

No. 2495

v.

Donald J. Trump, et. al.,

Defendants.

**PLAINTIFF'S BRIEF IN SUPPORT OF
MOTION FOR A PROTECTIVE ORDER**

I. Matter Before The Court

The Plaintiff's Motion for a Protective Order.

II. Question Presented

Should the Motion for a Protective Order be granted? Suggested answer: yes.

III. Facts

The above captioned matter concerns *inter alia* defamation injuries inflicted by Defendants Gregory Stenstrom and Leah Hoopes, beginning on or about November 25, 2020, and a true and correct copy of the pending Complaint is attached hereto and incorporated herein as Exhibit A.

As reflected on the docket, Defendants Stenstrom and Hoopes filed their Answer to the Plaintiff's Complaint on May 23, 2022, and said Defendants subsequently discharged their

attorney, Thomas J. Carroll, whereupon this Honorable Court entered an Order on October 31, 2022 (docketed November 9, 2022) allowing said Defendants to proceed *pro se* in the above captioned matter.

Since the entry of that Order, Defendants Stenstrom and Hoopes have engaged in a repeated pattern of threatening to use explosives against this Honorable Court and/or the Plaintiff and/or the Plaintiff's undersigned counsel, in order to achieve their litigation and/or political objectives in the above captioned matter, culminating with said Defendants most recent claims that undersigned counsel and the Honorable Daniel Anders are conspiring, as gay activists, to manipulate the proceedings in the above captioned matter, as further set forth *infra* at length.

On December 2, 2022, Defendant Stenstrom published a statement on his personal blog⁶, announcing his intentions as follows:

“The Constitution provides three ways to change our Republic, the jury box, the ballot box, and the powder box.

If we don't fight in the jury box to protect our ballot box, our families, loved ones, and friends will have to suffer the pain of the powder box.”

A full and complete transcript of Defendant Stenstrom's remarks in this regard is attached hereto and incorporated herein as Exhibit B.

On December 7, 2022, Defendant Stenstrom published the following statement on his personal blog⁷, summarizing an interview Defendants Stenstrom and Hoopes conducted with Steve Bannon on Friday, December 2, 2022 (and providing a copy of the video thereof), to wit:

“Our second appearance on Friday, 02Dec on Steve Bannon's 'War Room' was a bit meatier than our first abbreviated appearance on Wednesday, 30Dec, and included a report on the situation in Brazil, **which is where we may be heading if we can't sort this out in our Courts. Our goal is to keep this in the realm of the jury box, to solve the problems with the ballot box, and not have to resort to the powder box. Stay in the fight.”**

Video transcript:

(00:00) Steve Bannon: “Greg Stenstrom and Leah Hoopes and we've had them on a number of times, guys we're gonna have about ten minutes, I just want you to take us through, you guys take it walk through what the book is about but particularly what you found about the corruption in the stealing of the election in 2020 in Delaware County...(3:26)...Brazil's on the brink essentially about the machines...when you say on a mass basis, they substitute votes for the ballots

⁶ <https://patriot.online/@gregorystenstrom/posts/AQDXESoTTcwANHMYy>

⁷ <https://patriot.online/notice/AQMGjoRrlmDPhQ7oQa>

they created, number one walk me through how they substituted it and then number two how they actually created their own ballots. Greg, why don't you do that, just tell me how they substituted it, and how they created their own."

(03:54) Gregory Stenstrom: **"First of all, this is grand mal corruption that's centrally controlled, and it is a national conspiracy, and it's highly targeted. They target specific counties. 32 counties control basically at a mass level the 3200 other counties in the country. At that level what they do is they bring in hundreds of thousands, millions of fake ballots that they create from actual voter rolls, which they then scrub...**and then what they did in the central counting centers, which you saw everywhere – Antrim, Philadelphia, Delaware County, DeKalb County, Fulton County – then they don't let you get near the ballots. The reason they do that is because they can't let you see them. **They run them through the machines and once that ballot comes out of an envelope, it's a fired bullet.** (05:02.)"

See Exhibit B.

On March 14, 2023, Defendant Stenstrom made his most recent confession of considering the use of explosives, during Defendants Stenstrom and Hoopes' mutual appearance on an interview with Roger Stone⁸, whereupon Defendant Gregory Stenstrom agreed to the suggestion that he had no confidence in the judicial system, and that a solution to that problem was the employment of explosives, to wit:

(35:05) Roger Stone: "So I guess here is the question cause obviously you paint a very draconian picture, certainly a downbeat interview in terms of the inherent corruption and unfairness of the system. We know we were raised to believe that the judicial branch of the government was non-political, that it was fair, that it was based on equal justice, that the purpose of the courts were to get to and to and underline the truth, but as you and I agreed this weekend, **neither one of us has much confidence in the judicial system. You presented an open and shut case, you've documented everything you've said here today, yet it particularly authorities in the states of Pennsylvania who had a legal requirement to conduct an investigation and take action and have done nothing whatsoever, Greg what's the solution? Is there a solution? Other than prayer?"**

Gregory Stenstrom: **Well there is, there is a solution.** I think one of the reasons you and I hit it off when we met, and also you mentioned President Trump, the magic of President Trump and the experience you brought to elections, and what bonds Leah and myself, is that we're in the voting business, we're in the citizenry business, we're in the republic business. **We want – you**

⁸ <https://frankspeech.com/video/stonezone-gregory-stenstrom-leah-hoopes-authors-parallel-election>

know, you can conver – you can change the country from the soap box, the ballot box, the jury box, and the powder box (explosive enumeration with fingers) and what we've been involved in is hearts and minds, voters, the misanthropes...(whereupon he goes into his ant analogy attacking one another in a jar)...we identify the misanthropes, you already identified them in your book about Bush, and then we go after the legislation that gave them the power to do this, and then we're gonna find our way home, and that's just the starting point. That's the close on that question.”
See Exhibit B.

Finally, on May 17, 2023, Defendants Stenstrom and Hoopes appeared in a video interview on the CannCon podcast⁹, whereupon Defendant Stenstrom said that undersigned counsel for the Plaintiff was conspiring with the Honorable Daniel Anders of the Court of Common Pleas of Philadelphia County, as homosexual activists, in order to manipulate the proceedings in the above captioned matter, and compared undersigned counsel and Judge Anders to drag queen performers who expose themselves to children, and deserving of being attacked, to wit:

(01:31:03) Gregory Stenstrom: “Now if we only have time to talk about the election, we focus on that. But the bigger picture, Brian, and Leah was talking about it, is **these people are taking over the country one thing at a time**. Now I can't, I can't even say the word transgender. You know, we used to, you know, I can't even say anything. Well I do, I don't care. I can't say anything in our lawsuit, we, **you know we had a problem with, uh, you know we had a problem with uh what looks like a, like a group of you know gay um activists who are in the, in the court. And we just said, hey, look it. You know, the judge, the lawyer that's suing us is the first gay divorce attorney in the country, and the judge he's putting everything to is the first gay judge openly gay judge in Philadelphia. So I said well we're sitting here in one part of the court, we're going through the motions, and all of a sudden this guy shifts it over you know to this venue in the court. So what happens is, people are afraid to say anything...they're afraid of saying the obvious. It's like you know like these drag queens in in in elementary schools. People are afraid of saying why is that freak show you know waiving his ass, and doing the most lewd things in front of children, and no one is tackling him. And everyone is oh geez you know we can't say anything. We can't say anything about the election, I don't want to be an election denier, I don't want to say anything about transgender, I don't want to say anything about potentially offending somebody about gay rights...**(1:34:21) This is what we're dealing with. And if we don't start addressing these things – take care of your health, get your tests from Immunoprofile(.com), you know go to Patriot.Online, donate to us, learn you

⁹ <https://rumble.com/v2od4t2-live-at-9pm-with-greg-stenstrom-and-leah-hoopes-on-their-active-pa-2020-law.html>

know it's a great social media platform, go to the ParallelElection.com, buy the book..."

See Exhibit B.

Some and/or all of these suggestions of violence, as set forth *supra*, have been stated or promoted by Defendants Stenstrom and/or Hoopes in the pursuit of selling their self published book about the above captioned matter and the 2020 election, entitled The Parallel Election¹⁰.

IV. Argument

Pa.R.C.P. 4012 provides that the Plaintiff may request a protective order from the Court, such as that being requested herein, as "justice requires to protect a party or person from unreasonable annoyance...oppression, burden, or expense" and which is warranted by the aforementioned statements and publications from Defendants Stenstrom and Hoopes, suggesting as they do the employment of explosives to achieve their litigious and political goals, specifically identifying undersigned counsel, and the Hon. Daniel Anders, as conspiratorial gay activists who are deserving of violent repercussions.

42 Pa.C.S.A. § 2503 provides that attorney's fees may be awarded where, as here, Defendants Stenstrom and Hoopes have engaged in dilatory, obdurate or vexatious conduct during the pendency of a matter, and the aforementioned actions of Defendants Stenstrom and Hoopes have consequently preoccupied in excess of thirty (30) hours of undersigned counsel's time, including but not limited to filing reports with the Federal Bureau of Investigation, and the Attorney General's Office.

V. Conclusion

Plaintiffs respectfully request entry of the attached Protective Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: January 2, 2019


J. Conor Corcoran, Esquire
Attorney for Plaintiff

¹⁰ See The Parallel Election, © 2022 by Gregory Stenstrom and Leah Hoopes, published by Interrita Publishing, ISBN Nos. 978-1-958682-29-6, 978-1-958682-28-9, and 978-1-958682-27-2.

CERTIFICATE OF SERVICE

I, J. Conor Corcoran, Esquire, hereby certify that a true and correct copy of the foregoing Motion for Protective Order was sent to the following via email and the Court's efileing system:

Michael T. Madaio, Esq.
mmadaio@habbalaw.com
Attorney for Defendants Trump and DJTFP, Inc.

Defendants Giuliani and Giuliani PLLC, *pro se*
Truthandjustice4u@protonmail.com, maria.ryan@giulianipartners.com

Hoopes & Stenstrom Defendants, *pro se*
leahfreedelcopa@protonmail.com, gstenstrom@xmail.net

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: June 6, 2023



J. Conor Corcoran, Esquire
Attorney for Plaintiff

EXHIBIT F



Federal Bureau of Investigation
Washington, D.C. 20535

January 17, 2024

LEAH HOOPES
241 SULKY WAY
CHADDS FORD, PA 19317

Request No.: 1615549-000
Subject: HOOPES, LEAH

Dear Leah Hoopes:

This is in response to your Freedom of Information/Privacy Acts (FOIPA) request. Based on the information you provided, we conducted a main and reference entity record search of the Central Records System (CRS) per our standard search policy. However, we were unable to identify records subject to the FOIPA that are responsive to your request. Therefore, your request is being closed. If you have additional information pertaining to the subject of your request, please submit a new request providing the details, and we will conduct an additional search. For more information about records searches and the standard search policy, see the enclosed FBI FOIPA Addendum General Information Section.

Please see the paragraphs below for relevant information that may be specific to your request. Only checked boxes contain corresponding paragraphs relevant to your request. If no boxes are checked, the corresponding information does not apply.

- Please be advised that your request was reopened based on the additional information you provided. A new search was conducted, and we were unable to identify responsive records subject to the FOIPA that are responsive to your request.
- Records potentially responsive to your request were destroyed. Since this material could not be reviewed, it is not known if it was responsive to your request. Record retention and disposal is carried out under supervision of the National Archives and Records Administration (NARA) according to Title 44 United States Code Section 3301, Title 36 Code of Federal Regulations (CFR) Chapter 12 Sub-chapter B Part 1228, and 36 CFR 1229.10. Please be advised that the General Records Schedule (GRS) disposition authority for FOIPA records is DAA-GRS-2016-0002-0001 (GRS 4.2, Item 020).
- Records potentially responsive to your request were transferred to the National Archives and Records Administration (NARA). If you wish to review these records, file a FOIPA request with NARA at the following address:

National Archives and Records Administration
Special Access and FOIA
8601 Adelphi Road, Room 5500
College Park, MD 20740-6001

- Potentially responsive records were identified during the search. However, we were advised that they were not in their expected locations. An additional search for the missing records also met with unsuccessful results. Since we were unable to review the records, we were unable to determine if they were responsive to your request.
- The identification records requested are maintained by the FBI's Criminal Justice Information Services (CJIS) Division; therefore, we have forwarded a portion of your request to CJIS for processing. To check the status of this request, please contact CJIS directly at (304) 625-5590. For additional information, see the enclosed FBI FOIPA Addendum General Information Section.
- Requests for expedited processing are not applicable when a final response is issued within ten calendar days.

Police departments should be aware that the search conducted was limited to FBI records. Requests for criminal history records or rap sheets should be directed to Criminal Justice Information Services (CJIS). Information regarding CJIS is listed in the enclosed FBI FOIPA Addendum General Information Section.

Records potentially responsive to your request were transferred to the National Personnel Records Center - Civilian Personnel Records (NPRC-CPR). In order to obtain information on a file located at the NPRC, your request must be mailed to the following address:

National Archives and Records Administration
ATTN: Archival Programs
P.O. Box 38757
St. Louis, MO 63138

You also requested information regarding one or more third parties. Please be advised the FBI will neither confirm nor deny the existence of such records pursuant to FOIA exemptions (b)(6) and (b)(7)(C), 5 U.S.C. §§ 552 (b)(6) and (b)(7)(C). The mere acknowledgement of the existence of FBI records on third party individuals could reasonably be expected to constitute an unwarranted invasion of personal privacy. This is our standard response to such requests and should not be taken to mean that records do, or do not, exist.

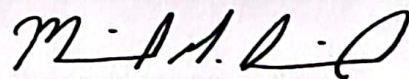
Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. "Part 1" of the Addendum includes standard responses that apply to all requests. "Part 2" includes additional standard responses that apply to all requests for records about yourself or any third party individuals. "Part 3" includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

Additional information about the FOIPA can be found at www.fbi.gov/foia. Should you have questions regarding your request, please feel free to contact foipaquestions@fbi.gov. Please reference the FOIPA Request number listed above in all correspondence concerning your request..

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of this response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

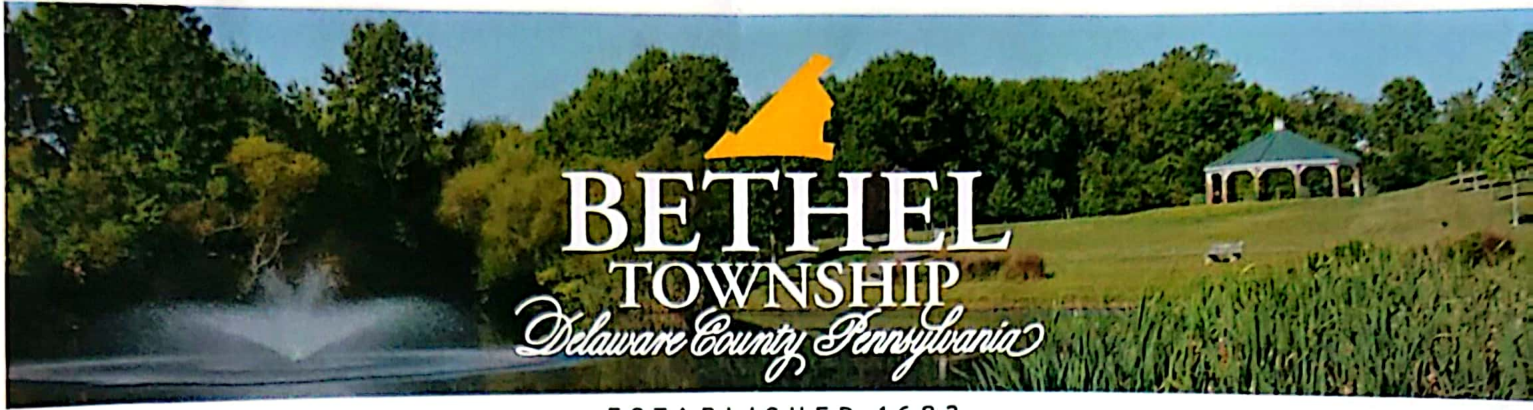
You may seek dispute resolution services by emailing the FBI's FOIA Public Liaison at foipaquestions@fbi.gov. The subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified. You may also contact the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,



Michael G. Seidel
Section Chief
Record/Information Dissemination Section
Information Management Division

Enclosures



ESTABLISHED 1683

Michael J. Davey, Esq.
CHAIRMAN

Michael W. Schneider, P.E.
VICE CHAIRMAN

Giovanna Iacono, P.E., MBA
SUPERVISOR

Michael D'Agostino, Esq.
SUPERVISOR

Joseph A. Platt, Jr. P.E.
SUPERVISOR

January 22, 2024

Leah Hoopes
241 Sulky Way
Chadds Ford, PA 19317
Email: leahfreedelcopa@protonmail.com

Re: Bethel Township Right-to-Know Request Dated December 20, 2023

Dear Ms. Hoopes:

On December 20, 2023, the Bethel Township Office of Open Records received your request for records pursuant to the Pennsylvania Right-to-Know Law, 65 P.S. § 67.101 et seq. ("RTK Law"). You requested:

- "1) Please provide any/all criminal investigative records, complaint forms online/digital, interoffice emails, or paper records with the complaint number(s) with this agency as it pertains to any/all criminal investigations or any inquiries initiated from date range from the year 2020 until the present time of the year 2023, or ongoing which is not privileged or confidential information as it pertains to Leah Hoopes
- 2) Please provide any/all sworn or non-sworn statements, complaints, or communications made about Leah Hoopes,
- 3) Please provide any financial records from Bethel Township used to investigate Leah Hoopes after she filed her witness declaration to US Attorney William McSwain on November 7th 2020."

The requests number 1 and 2 are denied in part and granted in part. Bethel Township Police Department has determined the requested records are exempt pursuant to 65 P.S. § 67.708(b)(16). However, the Bethel Township Police Department has also decided to exercise its discretion to make any otherwise exempt record accessible for inspection pursuant to 65 P.S. § 67.506(c). The Bethel Township Police Department incident reports for the below incidents are enclosed with this letter. The reports have been redacted to exclude juvenile and adult personal identifiable information.



ESTABLISHED 1683

Michael J. Davey, Esq.
CHAIRMAN

Michael W. Schneider, P.E.
VICE CHAIRMAN

Giovanna Iacono, P.E., MBA
SUPERVISOR

Michael D'Agostino, Esq.
SUPERVISOR

Joseph A. Platt, Jr. P.E.
SUPERVISOR

Leah Hoopes
January 22, 2024
Page 2

Bethel Township Police Incident Reports:

1. 20200229M0353;
2. 20200301M0359;
3. 20200805M1199;
4. 20210115M0124;
5. 20210117M0140;
6. 20220701M1470; and
7. 20221018M2133.

The request number 3 is denied because the records do not exist within the Bethel Township Police Department records. The requested records will not be created pursuant to 65 P.S. § 67.705.

You have a right to appeal the denials in writing to Delaware County District Attorney's Office, 201 West Front Street, Media, PA 19063 pursuant to 65 P.S. § 67.503(d)(2). Appeals must be made in writing and must be submitted to the Delaware District Attorney's Office **within fifteen (15) business days from the mailing date of this response or the date that the request was deemed denied** pursuant to 65 P.S. § 67.1101(a)(1). If that timeframe expires before you provide the required information to the Delaware County District Attorney's Office, you will lose your right to appeal. Thank you.

Sincerely,

James B. Halligan III, Esquire
Murphy Maddren Ltd.

Cc: Bethel Township

1092 Bethel Road • Garnet Valley, Pennsylvania 19060
P: (610) 459-1529 | F: (610) 459-2921

WWW.BETHELTWP.COM

000065

Main Narrative
PTL. J. VOLPONE (JV832)

01/15/2021 21:00 - 8321 PTL. J. VOLPONE

I received information through Delcom from PSP about a female that might have ties to the group that was involved with the incident in Washington DC. It was stated that through social media that Leah Hoopes was making statements that she was going to start a rebellion group and that she possibly belongs to a white supremacist origination. It was also stated that there was a picture of her holding an AK47 while making the comments.

I made contact with Leah Hoopes and explained why I was calling her. I asked her if she owned an AK47. She said no, she has a AR15 along with several other guns. I asked her about the picture on Facebook with the rifle. She said it was a profile picture of her holding a Tavor (Israeli Rifle) that was taken 7years ago. She said that she uses it off and on as her profile picture. She further stated that the picture is her using the rifle at a shooting range. I asked her about the incident in Washington DC and if she was making any statements about it. She said that she was at home during that incident. She said that she made comments about the event, but it was nothing different then what anyone else was saying. She said that she never said anything that would indicate that she was going or doing anything or that she was involved in any groups.

I asked her if she has been having any problems with anyone. She stated yes, there is at least two people that have been taking snap shots of her Facebook account and sending them out to his followers. She said that the Josh Twersky is making comments about her when he sends out the pictures. She also said that a David Cleary is doing the same thing. She said that she is involved in the republican party as a committee woman and since the elections she has been harassed by these two. I asked her if she is still on social media. She said no, she dropped her Twitter account about a week ago and deleted her Facebook account today. She then stated that the harassment actually started after she filed a complaint about the elections. She said that the attorney general sent two agents to her house on the 7th of November. I advised her that if she is having a problem with someone to call 911. I also told her that I did not detect anything that would bring this officer to believing that she was going to do anything.

I contacted PSP and and informed them of the information that I was able to gather.





OFFICE OF THE DISTRICT ATTORNEY
DELAWARE COUNTY COURTHOUSE
MEDIA, PENNSYLVANIA 19063

(610) 891-4162

JACK STOLLSTEIMER
DISTRICT ATTORNEY

Right-To-Know Response

December 28, 2023

Leah Hoopes & Greg Stenstrom
241 Sulky Way
Chadds Ford, PA 19317
[Leahfreedelcopa.@protonmail.com](mailto:Leahfreedelcopa@protonmail.com)

Re: Right-to-Know Law Request No. 35 of 2023

Dear Ms. Hoopes and Mr. Stenstrom,

Thank you for writing to the Office of the Delaware County District Attorney to request records pursuant to Pennsylvania's Right-to-Know Law ("RTKL"), 65 P.S. §§ 67.101 *et seq.*

A copy of your request is attached, which in addition to the unsigned letter request dated November 15, 2023, also includes three signed and notarized declarations, and a single sheet that appears to be titled "Totally missing V Drive." This office received the request on November 17, 2023 and sent a 30-day extension letter on November 21, 2023. A final response to your request is due on or before December 28, 2023.

The request seeks records from the dates of "on or before November 3rd, 2020 to the present time and month ending November 2023," and your enumerated requests are below and underlined (copied and pasted directly from your request letter), with a response following each:

- 1) Please provide any/all criminal or civil investigative records, complaint forms online/digital, interoffice e-mails, or paper records with the complaint number(s) with this agency as it pertains to any/all criminal investigations initiated in November 2020 which is not privileged or confidential information as it pertains to Leah Hoopes and/or Greg Stenstrom.

While your overall request seeks records from the dates of "on or before November 3rd, 2020 to the present time and month ending November 2023" this enumerated request

specifically asks for records pertaining to "any/all criminal investigations initiated in November 2020." This office does not possess records responsive to your request.

Specific date notwithstanding, if such records exist, the request, on its face is phrased in a manner where it is clear that records relating to a criminal investigation are being requested and are therefore exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." *Barros v. Martin*, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 2) Please provide any/all sworn or non-sworn statements, complaints, or communications made about Leah Hoopes and/or Gregory Stenstrom. This should also include any human resources employees or not employed by Delaware County District Attorney's Office as it pertains to the Respondents complaints and sworn falsifications that they have made on and off public records and in litigation that involved agents that have manufactured without facts in the form of court reports and Sworn Affidavits.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, *Pa. Dep't of Educ. v. Pittsburgh Post-Gazette*, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." *Pa. Dep't of Educ.*, 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). *Id.* Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." *Id.* at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. *Id.* None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." *Office of the DA of Phila. v. Bagwell*, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify any sender or recipient of the communications requested. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See *Pa. Dep't of Educ.*, 119 A.3d at 1125; see also *Pa. Dep't of Envtl. Prot. v. Legere*, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it

is exempt under the RTKL pursuant to 708(b)(16)(ii)." *Barros v. Martin*, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 3) Please provide the names of any/all investigator(s), assistants, involved parties, private law firms, county employees, private investigators that were assigned, tasked or participated in any/all investigations that that were discussed, initiated start and end dates of any and all investigations as it pertains to Leah Hoopes and/or Gregory Stenstrom who are Federal Witnesses and Whistleblowers as it pertains to the 2020 General Election and the criminally malicious lawsuits filed with the afore mentioned County Personnel. This should also include any/all employees and or agents that were involved in these matters must be identified, and their names released; (unless they are engaged in undercover work, and budgets cannot be classified.) (Names of the Persons that sued you and Greg or made statements to media or anything.)

As phrased, this request is insufficiently specific as this request fails to identify a specific type of record being requested. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, *Pa. Dep't of Educ. v. Pittsburgh Post-Gazette*, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." *Pa. Dep't of Educ.*, 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). *Id.* Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." *Id.* at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. *Id.* None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." *Office of the DA of Phila. v. Bagwell*, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

It also seems this office is being asked to create a record, as no such list of names exists. Pursuant to 65 P.S. § 67.705, an agency is not required to create a record or compile information that was not previously documented.

Lastly, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." *Barros v. Martin*, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal

wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 4) Please provide any/all recorded audio and video taken, preserved, saved, stored, sent, received e-mails or deleted from whistleblower, Regina Miller, and released by the District Attorney to the Delaware County Solicitor, and to the District Attorney or to the Solicitor or any other agency, media outlet, law firm or any opposing party in November 2021 that was in fact provided to main stream news outlet by the District Attorney's office of Delaware County, Pennsylvania staff or personnel.

This request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." *Pa. Dep't of Educ.*, 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). *Id.* Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." *Id.* at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. *Id.* None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." *Office of the DA of Phila. v. Bagwell*, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify any sender or recipient of the records requested. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See Pa. Dep't of Educ., 119 A.3d at 1125; see also *Pa. Dep't of Envtl. Prot. v. Legere*, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." Barros v. Martin, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

To the extent that you are requesting to view a video that is on a public domain, presumably the video can be accessed by you without assistance from this office.

This request is denied.

- 5) Please provide the Meeting Minutes of board meetings, as well as letters and memos pertaining this Right to Know request in respect and to the investigation initiated by the Delaware County District Attorney's office during the detailed time frames requested.

This office is not in possession of records responsive to this request.

- 6) Please provide any/all communications, information, letters, e-mails sent and received, dates, timelines, phone calls made to the Pennsylvania Attorney General's Office, Josh Shapiro or his agents, or the Federal Bureau of Investigation by ways and or any/all means, and methods used by the Delaware County District Attorney's Office its employees, agents or 3rd parties. This should also include ALL electronic copies of ALL email records to and from the various email domains that include specific and detailed list of keywords the agencies could of or did use to conduct any investigation, search or filing complaints against the Requesters Leah Hoopes and/or Gregory Stenstrom.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and Carey v. Pa. Dep't of Corr., 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." Pa. Dep't of Educ., 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient): Id. Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." Id. at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. Id. None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." Office of the DA of Phila. v. Bagwell, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify any sender or recipient of the correspondences requested. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See Pa. Dep't of Educ., 119 A.3d at 1125; see also Pa. Dep't of Envtl. Prot. v. Legere, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." Barros v. Martin, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal

wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 7) Please provide any/all Police reports, photographs, interviews or any other information that the agency might have, maintained, e-mails, sent, received, deleted or destroyed as it pertains to Leah Hoopes and/or Gregory Stenstrom.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." *Pa. Dep't of Educ.*, 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). *Id.* Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." *Id.* at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. *Id.* None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." *Office of the DA of Phila. v. Bagwell*, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify any sender or recipient of the correspondences requested. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See Pa. Dep't of Educ., 119 A.3d at 1125; see also *Pa. Dep't of Envtl. Prot. v. Legere*, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

*Also, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." *Barros v. Martin*, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).*

This request is denied.

- 8) Please Provide Emails sent from any/all public employee's work email accounts are records of their respective agency, and if they are related to that agency's business or investigation as it pertains to Leah Hoopes and/or Gregory Stenstrom.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and Carey v. Pa. Dep't of Corr., 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." Pa. Dep't of Educ., 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). Id. Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." Id. at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. Id. None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." Office of the DA of Phila. v. Bagwell, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify any sender or recipient of the correspondences requested. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See Pa. Dep't of Educ., 119 A.3d at 1125; see also Pa. Dep't of Envtl. Prot. v. Legere, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, this request might be misdirected, as it appears to be asking this office for the records of other unnamed agencies, records that would presumably not be in the possession of this office.

Lastly, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." Barros v. Martin, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. Pennsylvania State Police v. Office of Open Records, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 9) Please provide third-party records public records under the RTKL, that Agency or third-party in the possession of the contracting party and must directly relate to the governmental function as it pertains to Leah Hoopes and/or Gregory Stenstrom.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh

Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." *Pa. Dep't of Educ.*, 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). *Id.* Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." *Id.* at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. *Id.* None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." *Office of the DA of Phila. v. Bagwell*, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify what kinds of records are being sought, and specifically from whom. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See *Pa. Dep't of Educ.*, 119 A.3d at 1125; see also *Pa. Dep't of Envtl. Prot. v. Legere*, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, this request might be misdirected, as it appears to be asking this office for the records of other unnamed agencies, records that would presumably not be in the possession of this office.

Lastly, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." *Barros v. Martin*, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. *Pennsylvania State Police v. Office of Open Records*, 5 A.3d 473 (Pa. Commw. Ct. 2010) (*en banc*).

This request is denied.

- 10) Please provide any/all in person meeting dates, names, and title/ capacity of any witnesses that were interviewed during the investigation and the (detailed time frames from when to when). We or the Respondents, (are not asking for personal information), just the name of sources, witnesses, or agents that do not enjoy any legal protections from withholding these public records, and where the "Respondents" have accused the "Requesters" to have acted, defamed, or slandered in a criminally malicious operation in attempt to stop, prevent, or cover up their own bad acts, material misstatements, acts of verifiable recorded fraud, because they are elected officials and they hold positions of public trust which is even more important why these records do not have legal privilege to withhold that negatively affect the public body they serve as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

- 11) Please provide any/all agendas, notes, statements, recordings, county phone, county cell phone, private cell phone communications conducting county business person have been made on or off record by phone, text, e-mail, encrypted chat apps, mail, or private couriers as it pertains to Leah Hoopes and/or Gregory Stenstrom.

As phrased, this request is insufficiently specific enough to identify a transaction or business of the District Attorney's Office. Thus, this office is unable to ascertain what records you may be seeking. In determining whether a particular request is sufficiently specific, a three-part balancing test is employed. See, Pa. Dep't of Educ. v. Pittsburgh Post-Gazette, 119 A.3d 1121 (Pa. Commw. Ct. 2015), and Carey v. Pa. Dep't of Corr., 61 A.3d 367, 372 (Pa. Commw. Ct. 2013). First, "[t]he subject matter of the request must identify the 'transaction or activity' of the agency for which the record is sought." Pa. Dep't of Educ., 119 A.3d at 1125. Second, the scope of the request must identify a discrete group of documents (e.g., by type or recipient). Id. Third, "[t]he timeframe of the request should identify a finite period of time for which the records are sought." Id. at 1126. This factor is the most fluid and is dependent upon the request's subject matter and scope. Id. None of these factors are dispositive; instead, courts have emphasized the importance of a "flexible, case by case, contextual application of the test." Office of the DA of Phila. v. Bagwell, 155 A.3d 1119, 1145 (Pa. Commw. Ct. 2017).

Here, the request fails to identify what kinds of records are being sought, and specifically from whom. The lack of information, coupled with the multi-year time frame, or a narrower scope, to help limit the vast universe of potentially responsive records, is not enough to give the request the specificity required to provide this office with sufficient context to determine which records are potentially responsive to the Request. See Pa. Dep't of Educ., 119 A.3d at 1125; see also Pa. Dep't of Envtl. Prot. v. Legere, 50 A.3d 260, 265 (Pa. Commw. Ct. 2012).

Also, on its face, this request is phrased in a manner where it seems you might be requesting records that relate to a criminal investigation; records which would thereby be exempt from disclosure. "If a record, on its face, relates to a criminal investigation, it is exempt under the RTKL pursuant to 708(b)(16)(ii)." Barros v. Martin, 92 A.3d 1243 (Pa. Commw. Ct. 2014). A law enforcement agency is not required to disclose documents that relate to a criminal investigation and that would reveal the institution, progress, or result of a criminal investigation, except for the filing of criminal charges. 65 P.S. § 67.708(b)(16)(vi)(A). If information is assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing, it is exempt from disclosure. Pennsylvania State Police v. Office of Open Records, 5 A.3d 473 (Pa. Commw. Ct. 2010) (en banc).

This request is denied.

- 12) Please provide all billing, invoices, detail the money spent with county, state, federal finances used to investigate the November 2020 election, specifically Leah Hoopes and Gregory Stenstrom and the whistleblower video and audio released in November 2021 as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

13) Please provide any/all private letters or any/all e-mail, text or any/all communications provided by the District Attorney's office, or County Offices to Gerald Lawrence on/ before or after May 2022 and as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

14) Please provide any/all communications, emails, texts, faxes, attachments, in preparation for the June 2nd, 2022 press release for the District Attorney as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

15) Please provide any/all emails communications between County Attorneys, Private attorneys, 3rd parties, County Council members (as well as between attorneys, council and council employees) regarding any matters as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

16) Please provide any/all emails communications between elected or non-elected personnel or the Agency that made political or investigative inquiries or complaints within or outside the District Attorney's office and between the County Offices to include any communications to media that were used to slander, or to defame their political enemies for exposing political or public corruption or misconduct or collected any/all information on the Leah Hoopes and/or Gregory Stenstrom as part of the "Respondents or the Agencies" investigations as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

17) Please provide any/all legal correspondence, legal records, videos, communications electronic and written that may, or may not have been destroyed, altered, or tampered with, or have been removed, redacted, hidden or manipulated to these exact, detailed specific requests for information as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

18) Please provide any/all "tip letters", "notices" or "official" or "non-official" investigative files associated with any/all agencies and their investigation of Leah Hoopes and Gregory Stenstrom and as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

19) Please provide in detail any/all conflicts of interest which would prevent the Respondents attorneys from working on the same case as it pertains to Leah Hoopes and/or Gregory Stenstrom.

This office is not in possession of records responsive to this request.

20) Please provide all communications to and from the District Attorneys Office, County office, Private Attorneys, or 3rd parties that may or may not have communicated favors,

requests, or any other communication to Judge Jack Whelan, Judge John Cappuzzi, Judge Barry Dozor, Judge Spiros Angelos, Judge Michael Erdos, and any other agents for the Courts, 3rd parties of Delaware, Philadelphia or any other counties that may have participated in the swaying of public opinion, and in court proceedings against Leah Hoopes and/or Gregory Stenstrom

This office is not in possession of records responsive to this request.

You have a right to appeal the denied portions of this request in writing to: Office of Open Records, 333 Market St., 16th Floor, Harrisburg, PA 17101-2234. Appeals can also be filed online at the Office of Open Records website, <https://www.openrecords.pa.gov>.

If you choose to file an appeal you must do so within 15 business days of the mailing date of the agency's response. See 65 P.S. § 67.1101. Please note that a copy of your original RTKL request, the agency's extension notice, and this denial letter should be included when filing an appeal. More information about how to file an appeal under the RTKL is available at the Office of Open Records website, <https://www.openrecords.pa.gov>.

If you have additional questions, please contact Deputy District Attorney Salena Jones, who answered this request in the place of ADA Rachael Kemmey who has a conflict. This correspondence will serve to close this record with our office as permitted by law.

Respectfully,



Salena Jones
Deputy District Attorney
joness@co.delaware.pa.us

EXHIBIT G



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

MICHELLE A. HENRY
ATTORNEY GENERAL

November 17, 2023

15th Floor, Strawberry Square
Harrisburg, PA 17120
(717) 783-1111

E-mail: lmhoopes614@gmail.com

Leah Hoopes
241 Sulky Way
Chadds Ford, PA 19317

**RE: Right to Know Request
2023-225**

Dear Ms. Hoopes:

This letter acknowledges receipt by the Office of Attorney General of your written request for records under the Pennsylvania Right-to-Know Law (65 P.S. § 67.101 *et seq.*) (“RTKL”). The Right to Know Office received your request on October 11, 2023. On October 18, 2023, you were notified that a legal review was necessary to determine whether the records requested are subject to access under the RTKL and that additional time was required to perform this review. As provided in the RTKL, the Office of Attorney General (“OAG”) required up to an additional 30 calendar days, or until November 17, 2023, in which to provide a final response to your request. The review has now been completed, and this letter serves as our final response.

The “identified records” are those stated in your October 11, 2023 request, as modified by any subsequent communications. Specifically, your request indicates that you are seeking the following information:

Provide all records, documents, emails, phone calls, texts, faxes, pertaining to an investigation of Leah Hoopes. Provide complaints, scope of investigation, dates and times of all emails, meeting dates, names of agency employees, send all invoices and expense of state funds used to investigate Leah Hoopes. Date range - January 1st 2020 through October 24th 2023

A full and complete search pursuant to the requirements of the RTKL has been conducted. Your request cannot be granted, as no responsive records have been found within this agency.

NO RECORDS FOUND

A full and complete search was conducted, based upon the parameters of your request as set forth above, and it has been determined that the requested information—all records pertaining to an investigation of Leah Hoopes, as specified above—does not exist as a record of this agency and we are not required to create a record that does not exist. 65 P.S. § 67.705. *Moore v. Office of Open Records*, 992 A.2d 907 (Pa. Cmwlth. 2010). It should be noted that it is not a denial of access when an agency does not have possession, custody or control of a record and there is no legal obligation to obtain such record. 65 P.S. § 67.506(d)(1). However, if you choose to interpret this letter as a denial, you may file an appeal as indicated below.

CONCLUSION

For the above reason, your request could not be granted. We trust that this response addresses the intent of your request.

RIGHT TO APPEAL

BY PROVIDING THIS RESPONSE, THE OFFICE OF ATTORNEY GENERAL HAS SATISFIED ITS OBLIGATION TO RESPOND TO YOUR REQUEST. SHOULD YOU WISH TO CHALLENGE THIS RESPONSE UNDER THE RTKL, YOU MUST FILE AN APPEAL WITH THE RIGHT TO KNOW APPEALS OFFICER OF THE PENNSYLVANIA OFFICE OF ATTORNEY GENERAL, WITHIN FIFTEEN (15) BUSINESS DAYS OF THE MAILING DATE OF THIS LETTER. YOUR APPEAL MUST INCLUDE A COPY OF YOUR ORIGINAL REQUEST AND THIS AGENCY'S RESPONSE, STATE THE GROUNDS UPON WHICH YOU CLAIM YOUR REQUEST SHOULD NOT HAVE BEEN DENIED AND ADDRESS ALL REASONS STATED BY THIS AGENCY FOR ITS DENIAL OF YOUR REQUEST. FAILURE TO FOLLOW THESE INSTRUCTIONS MAY RESULT IN DISMISSAL OF YOUR APPEAL. YOUR APPEAL MUST BE SENT TO THE FOLLOWING:

RIGHT TO KNOW APPEALS OFFICER
OFFICE OF ATTORNEY GENERAL
CIVIL LITIGATION SECTION
15TH FLOOR STRAWBERRY SQUARE
HARRISBURG, PA 17120

November 17, 2023

Please note that this response is being sent from an unmonitored e-mail address. Do not reply to this e-mail.

Sincerely,



Sharon K. Maitland
Deputy Attorney General
Right to Know Officer

SKM:mae
2023-225

EXHIBIT H



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

MICHELLE A. HENRY
ATTORNEY GENERAL

February 1, 2024

15th Floor, Strawberry Square
Harrisburg, PA 17120
(717) 783-1111

E-mail: leahfreedelcopa@protonmail.com

Leah Hoopes
241 Sulky Way
Chadds Ford, PA 19317

**RE: Right to Know Request
2023-299**

Dear Ms. Hoopes:

This letter acknowledges receipt by the Office of Attorney General of your written request for records under the Pennsylvania Right-to-Know Law (65 P.S. § 67.101 *et seq.*) (“RTKL”). The Right to Know Office received your request on December 22, 2023. On January 2, 2024, you were notified that a legal review was necessary to determine whether the records requested are subject to access under the RTKL and that additional time was required to perform this review. As provided in the RTKL, the Office of Attorney General (“OAG”) required up to an additional 30 calendar days, or until February 1, 2024, in which to provide a final response to your request. The review has now been completed, and this letter serves as our final response.

The “identified records” are those stated in your December 22, 2023 request, as modified by any subsequent communications. Specifically, your request indicates that you are seeking the following information:

1. Please provide the First and Last Names of the Pennsylvania Attorney Agents who ordered, responded, and directed to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll’s homes on, before, during or after November 17th, 2020 to the present time and date and per the follow up phone call to Agent:

2. Please provide the Pennsylvania Attorney Agents reports, orders and detailed directives from their supervisors from their visit to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes on, before, during or after November 17th, 2020 to the present time and date?
3. Please provide all reports, emails, phone calls, faxes, developed by Special Agent Aidi Marcial, and any other agents or involved staff as it pertains to Leah Hoopes and Gregory Stenstrom.
4. Please provide Global Positioning Data of their State Issued Cell Phones, and as well GPS of Special Agent, Aidi Marcial and any/all other agents that visited Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes on, before, during or after November 17th, 2020 to the present time and date and per the follow up phone call to Agent:
5. Provide any and all communications between Josh Shapiro (previous AG) and William McSwain and/ or US Attorney Generals' office of the Eastern District in regard to criminal referral for voter fraud during timeframe of April 2020 to ending December 2022.
6. Please provide the dates, times, e-mails, phone calls, texts, or meetings that took place when US Attorney William McSwain contacted Pennsylvania Attorney General, Josh Shapiro and what information was shared by e-mails, phone calls, text, or meetings took place to discuss the election fraud, and regarding Leah Hoopes and Greg Stenstrom sworn affidavits that were provided to US Attorney William McSwain, to provide to the US Attorney General at the time Bill Barr.
7. Please provide any and all communications, e-mails, letters, invoices and other things with Kathy Boockvar, President of "Athena Strategies LLC."- a company that advertises as "Election Security, Democracy, and Trust, and also please provide "Brennan Center for Justice" communications e-mails, letters, invoices and other things, and assistance that Kathy Boockvar has provided to Josh Shapiro regarding Leah Hoopes, and Greg Stenstrom any and all assistance and communications while Josh Shapiro was Attorney General to the present date of him being the Governor of Pennsylvania.
8. Please provide all financial records that Josh Shapiro used to investigate, intimidate, harass, or threaten Leah Hoopes, and

Greg Stenstrom when and following them reporting Election Fraud and reporting that Josh Shapiro sent Special Agents to their homes uses State Tax dollars.

9. Please provide any/all criminal or civil investigative records, complaint forms online/digital, interoffice e-mails, or paper records with the complaint number(s) with the Pennsylvania Attorney General's office, agency as it pertains to any/all criminal investigations initiated in November 2020 regarding Leah Hoopes and Greg Stenstrom which is not privileged and is not confidential information, per the Duane Morris invoices that detailed communications are communications with the Attorney General's office and Duane Morris law firm.
10. Please provide any/all sworn or non-sworn statements, complaints, or communications made about Leah Hoopes and Gregory Stenstrom. This should also include any human resources employed or not employed by Pennsylvania Attorney General's office as pertains to the Respondents complaints and sworn falsifications that they have made on and off public records and in litigation that involved agents have manufactured without facts in the form of court reports and Sworn Affidavit.
11. Please provide the names of any/all investigator(s), assistants, special agents, involved parties, private law firms, county employees, private investigators that were assigned, tasked or participated in any/all investigations that that were discussed, initiated start and end dates of any and all investigations as it pertains to Leah Hoopes and Gregory Stenstrom who are Federally protected Witnesses and Whistleblowers as it pertains to the 2020 Presidential General Election Fraud. This should also include any/all employees and or agents that were involved in these matters must be identified, and their names released; (unless they are engaged in undercover work, and budgets cannot be classified.) (Names of the Persons that sued Leah and Greg or made statements to media or anything.)
12. Please provide any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from Pennsylvania Attorney General's Josh Shapiro or his agents to the Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and

methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants.

13. Please provide This should also include ALL electronic copies of ALL email records to and from the various email domains that include specific and detailed list of keywords the agencies could of or did use to conduct any investigation, search or filing complaints against the Requesters Leah Hoopes and Gregory Stenstrom.
14. Please provide any/all agent reports, photographs, interviews or any other information that the agency have, maintained, e-mails, sent, received, deleted or destroyed as it pertains to Leah Hoopes and Gregory Stenstrom.
15. Please provide any/all in person meeting dates, names, and title/capacity of any witnesses that were interviewed during the investigation and the (detailed time frames from when to when). We or the "Requesters" Leah Hoopes and Greg Stenstrom, (are not asking for personal information), just the name of sources, witnesses, or agents that do not enjoy any legal protections from withholding these public records, and where the "Respondents" have accused the "Requesters" to have acted, defamed, or slandered in a criminally malicious operation in attempt to stop, prevent, or cover up their own bad acts, material misstatements, acts of verifiable recorded fraud, because they are elected officials and they hold positions of public trust which is even more important why these records do not have legal privilege to withhold that negatively affect the public body they serve.
16. Please provide any/all agendas, notes, statements, recordings, agency VoIP phone calls, agency cell phones, private cell phone communications conducting State business on personal devices that have been made on or off record by phone, text, e-mail, encrypted chat apps, mail, or private couriers or other means.
17. Please provide all emails, meetings with adverse republican or independent parties involved political parties to Pennsylvania Attorney General, Governor Wolf's office, and any local politicians as it pertains to election fraud uncovered in Delaware County.
18. Please provide all communications provided by Mike Verb, Katie Muth to the Attorney General, or Governor, or Media

outlets or any other party before and after these time frames regarding any and all things in this right to know request.

19. Please provide any/all communications the Pennsylvania Attorney General Josh Shapiro, his agents, employees, or 3rd parties communicated information to Media outlets, Political Action Committees, or independent 3rd parties such as Factcheck.org, NAACP, The Annenberg Foundation Trust or any other domestic or foreign agency in any shape or form this is to include public statements made to the Media by Josh Shapiro, made about President Donald Trump and all things related to the Election Fraud in Delaware County or anywhere else in or outside the Commonwealth of Pennsylvania that influenced, swayed, or interfered, or postured investigations to control outcomes of public opinions, trust, and votes.
20. Please provide any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from United States Attorney General's William Barr or his agents to the Pennsylvania Attorney General's office, also included Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware County Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants.
21. Please provide any geofencing and metadata of any tracking in human, or electronic, or AI form of Leah Hoopes and Gregory Stenstrom's phone or online footprint, for all communications including emails, phone records etc. even if it included unlawful tracking of social media or cellular digital locations of Leah Hoopes and Gregory Stenstrom's cell phones, or unauthorized illegal wire taps.
22. Please provide all information and communications sent or received from Factcheck.org relative to any/all of the request to know and please provide.

A full and complete search pursuant to the requirements of the RTKL has been conducted. It has been determined that your request is respectfully denied in part and cannot be granted in part, as some records have not been found within this agency¹.

¹ Your request appears to be seeking records related to an OAG investigation against you and/or Gregory Stenstrom. Please note, there is no investigation against Leah Hoopes or Gregory Stenstrom. As a result, many of the records you are seeking do not exist as records of the OAG as further explained below.

REQUEST PARTS #4, #5, #6, #7, #8, #9, #11, #13, #15, #18, #19, #21, #22-NOT GRANTED

No Records Found

A full and complete search pursuant to the requirements of the RTKL has been conducted, based upon the parameters of your request as set forth above, and it has been determined that the requested information for Parts #4, #5, #6, #7, #8, #9, #11, #13, #15, #18, #19, #21, #22, as specified above, does not exist as a record of this agency and we are not required to create a record that does not exist. 65 P.S. § 67.705. *Moore v. Office of Open Records*, 992 A.2d 907 (Pa. Cmwlth. 2010). It should be noted that it is not a denial of access when an agency does not have possession, custody or control of a record and there is no legal obligation to obtain such record. 65 P.S. § 67.506(d)(1). However, if you choose to interpret this letter as a denial, you may file an appeal as indicated below.

REQUEST PARTS #12, #16, #17, #20 - DENIED

Insufficiently Specific

Your request is insufficiently specific pursuant to the provisions of section 703 of the RTKL. 65 P.S. § 67.703. In determining whether a particular request under the RTKL is insufficiently specific, there is a three-part balancing test established by the Commonwealth Court. *See Pa. Dep't of Educ. v. Pittsburgh Post-Gazette*, 119 A.3d 1121 (Pa. Cmwlth. 2015), and *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Cmwlth. 2013). This test requires analysis of three factors: “(1) the subject matter of the request; (2) the scope of documents sought; and (3) the timeframe for which records are sought.” *Pa. Dep't of Educ.* 119 A.3d at 1124. “The subject matter of the request must identify the ‘transaction or activity’ of the agency for which the record is sought.” *Pa. Dep't of Educ.* 119 A.3d at 1125. The scope of the request must identify “a discrete group of documents, either by type ... or by recipient.” *Carey*, 61 A.3d at 372. And finally, the timeframe of the request should identify a finite period of time. *Pa. Dep't of Educ.* 119 A.3d at 1126. *See Carey*, 61 A.3d at 372.

Subject Matter and Scope of Documents You Requested

Your request is not specific as to what you are trying to find. You seek:

12. “any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from Pennsylvania Attorney General’s Josh Shapiro or his agents to the Federal Bureau of Investigation, US Attorney’s Office, Delaware County District Attorney’s, Delaware Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants.” *and*

16. "...any/all agendas, notes, statements, recordings, agency VoIP phone calls, agency cell phones, private cell phone communications conducting State business on personal devices that have been made on or off record by phone, text, e-mail, encrypted chat apps, mail, or private couriers or other means." *and*

17. "...all emails, meetings with adverse republican or independent parties involved political parties to Pennsylvania Attorney General, Governor Wolf's office, and any local politicians as it pertains to election fraud uncovered in Delaware County." *and*

20. "...any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from United States Attorney General's William Barr or his agents to the Pennsylvania Attorney General's office, also included Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware County Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants."

However, you do not provide sufficient specificity, such as a subject matter, name/number of an OAG investigation, specific key words, the names of individuals considered to be adverse, names of media outlets, or some other further defining context in order for the OAG to conduct a good faith search for records that may be responsive to your request. As a result of this lack of specificity, the scope of documents sought cannot be determined. Also, your request then shifts the burden to our office to determine what you mean by certain of the terms included in your request such as:

12. "*any/all communications...sent and received...to or from Pennsylvania Attorney General's Josh Shapiro or his agents to [various agencies] or any other county agent office* by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants." *and*

16. "...*any/all* agendas, notes, statements, recordings, agency VoIP phone calls, agency cell phones, private cell phone communications conducting State business on personal devices *that have been made on or off record* by phone, text, e-mail, encrypted chat apps, mail, or private couriers or other means." *and*

17. "...*adverse republican* or independent parties involved political parties to Pennsylvania Attorney General, Governor Wolf's office." *and*

20. "...*any/all communications...sent and received...to or from United States Attorney General's William Barr or his agents to the Pennsylvania Attorney General's office, also included Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware County Board of Elections, Delaware County Council or any other county agent office* by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants."

When responding to requests made in accordance with the RTKL, an agency is only required to supply access to records that exist as public records of the agency that are sufficiently identified to allow the agency to determine what records are being sought. Rather than guessing everything a request might conceivably encompass, such as the request's intended investigatory nature or target, the purpose of the RTKL is for a requester to ask for a record that is clearly defined and easily identified, thereby allowing an agency to determine if the record sought is publicly available. 65 P.S. § 67.703; *Pennsylvania State Police v. Office of Open Records*, 995 A.2d 515 (Pa. Cmwlth. 2010).

Timeframe

The timeframe of a request should identify a finite period of time for which records are sought. *Pa. Dep't of Educ.*, 119 A.3d at 1126. The analysis of whether the timeframe of a request is sufficiently specific depends on the specificity and scope of the request. *Mollick*, 32 A.3d 859, 871. Although this request does provide a finite time period in which to search for potentially responsive records, without a subject matter to guide the potential record holders to a discrete group of documents, it is unreasonable to expect the OAG to search through more than three years of records; as a result, this request lacks specificity. *Pa. Dep't of Educ.*, 119 A.3d at 1126. Therefore, this request is insufficiently specific because it does not provide a subject matter or context by which the request can be narrowed even if it does provide a finite timeframe.

In the alternative, even if the OAG was able to determine with specificity the records you are seeking, they would all relate to a criminal investigation conducted by the OAG regarding complaints of potential voter fraud and would be denied for one or more of the reasons identified below.

REQUEST PART #1, #2, #3, #10, #14 - DENIED

Covert Law Enforcement Agent

Certain requests or parts of requests are for covert law enforcement agent names, and they are not disclosable under the RTKL. 65 P.S. § 67.708(b)(6)(iii). Agent names are withheld from disclosure pursuant to section 708 of the RTKL, which precludes the release of the "name or other identifying information relating to an individual performing an undercover or covert law enforcement activity from a record." 65 P.S. § 67.708(b)(6)(iii). *Pennsylvania State Police v. McGill*, 83 A.3d 476 (Pa. Cmwlth 2014); *Gordon Rago and York Daily Record v. Pennsylvania State Police*, OOR Dkt. AP 2017-045. Here, you are requesting information regarding the names of OAG agents involved in a criminal investigation where the agents were investigating complaints of potential voter fraud. As such, their names may not be disclosed under the RTKL and your request is denied.

Criminal Investigative Exemption

The records you seek are records concerning a criminal investigation maintained by the OAG's Criminal Investigation Division and they are not subject to disclosure based upon the

RTKL’s criminal investigative exemption. Exempt from disclosure are records that constitute “a record of an agency relating to or resulting in a criminal investigation including...complaints of potential criminal conduct...investigative materials, notes, correspondence, videos and reports...[a] record that includes information made confidential by law or court order...[and] [a] record that, if disclosed, would...[r]eveal the institution, progress or result of a criminal investigation, except the filing of criminal charges.” 65 P.S. §67.708(b)(16)(i), (ii), (iv) and (vi)(A). *Barros v. Martin*, 92 A.3d 1243 (Pa. Cmwlth. 2014); *Coley v. Philadelphia District Attorney’s Office*, 77 A.3d 694 (Pa. Cmwlth. 2013). Here, there are records related to an investigation regarding complaints of potential voter fraud. The records include investigative reports, witness interviews, communications, and attorney memorandum. These records were received or created in furtherance of a criminal investigation by criminal agents and attorneys, none of which include publicly available records. Moreover, disclosing the records would reveal the institution, progress or result of the criminal investigation. Therefore, records relating to the underlying criminal investigation are exempt from disclosure pursuant to the criminal investigative exemption.

Additionally, under the RTKL, a “public record” is a record that is “not exempt from being disclosed under any other Federal or State law or regulation...” 65 P.S. § 67.102. Here, the records are also exempt under the Criminal History Record Information Act (CHRIA).

CHRIA

Under CHRIA, “[i]nvestigative...[i]nformation shall not be disseminated to any department, agency or individual unless the department, agency or individual requesting the information is a criminal justice agency which requests the information in connection with its duties...” 18 Pa.C.S.A. § 9106(c)(4). “Investigative information” is defined by CHRIA as “[i]nformation assembled as a result of the performance of any inquiry, formal or informal, into a criminal incident or an allegation of criminal wrongdoing and may include modus operandi information.” 18 Pa.C.S.A. § 9102. *Coley v. Philadelphia District Attorney’s Office*, 77 A.3d 694 (Pa. Cmwlth. 2013); *Mitchell v. Office of Open Records*, 997 A.2d 1262 (Pa. Cmwlth. 2010). Here, the records you seek are related to a criminal investigation, as detailed above. They contain criminal investigatory information and are themselves investigatory in nature, all of which qualifies them for protection under CHRIA. As you, the requestor, are not a criminal justice agency, the OAG is without authority to release these records to you.

Attorney-Work Product

Here, the attorney-work product doctrine also protects certain documents from release. Records prepared or created that contain mental impressions, conclusions, legal theories and results of research, created by an attorney in the course of his professional duties are protected from disclosure by the attorney-work product doctrine. See *Bagwell v. Pennsylvania Department of Education*, 103 A.3d 409, 415-416 (Pa. Cmwlth. 2014). The work-product doctrine offers broad protection to these mental impressions, opinions and conclusions, regardless of whether they were prepared in anticipation of litigation. *Bagwell* at 417. Here, there are memorandum created by the attorney overseeing the case which contain their mental impressions and legal theories of regarding

the course of the voter fraud investigation and evaluation of the evidence related to the accusations of voter fraud.

PREDECISIONAL DELIBERATIONS

Records utilized to make a decision, recommendation or to form an opinion on legal or policy matters are precluded from disclosure as “a record that reflects the internal, predecisional deliberations of an agency, its members, employees or officials or predecisional deliberations between agency members, employees or officials and members, employees or officials of another agency, including predecisional deliberations relating to a budget recommendation, legislative proposal, legislative amendment, contemplated or proposed policy or course of action or any research, memos or other documents used in the predecisional deliberations.” 65 P.S. § 67.708(b)(10)(i)(A). *Kaplin v. Lower Merion Township*, 19 A.3d 1209 (Pa. Cmwlth. 2011), *petition for allowance of appeal denied*, 612 Pa. 693, 29 A.3d 798 (Pa. 2011). To prove this exception, the OAG is required to show that: “(1) the information is internal to the agency; (2) the information is deliberative in character; and (3) the information is prior to a related decision, and thus ‘predecisional’.” *Carey v. Department of Corrections*, 61 A.3d 367, 379 (Pa. Cmwlth 2013). In this case, there are communications and draft documents that reflect the internal, predecisional deliberations of employees of the OAG discussing particular legal theories and analysis regarding the OAG’s investigation into complaints of potential voter fraud and in discussing a course of action related to previously filed RTK request #2023-225. Records concerning the OAG’s investigation and/or RTKL deliberations into these matters contain predecisional deliberative materials. The records are withheld entirely under this exemption because: a) the communications were internal between OAG employees, b) the communications were made for the purpose of considering all available legal strategies and options regarding a proposed course of action, and c) the communications were predecisional, meaning they occurred before the OAG employees settled on a final course of action relative to the investigation of potential voter fraud and the Final Response to RTKL request #2023-225. A review of these records shows a clear progression of deliberation regarding the best course of action throughout the entire OAG’s investigation and RTKL deliberations. As such, these records are exempt from disclosure under the RTKL in accordance with 65 P.S. § 67.708(b)(10)(i)(A)

CONCLUSION

For the above reasons, your request has been respectfully denied in part and could not be granted in part. We trust that this response addresses the intent of your request.

RIGHT TO APPEAL

BY PROVIDING THIS RESPONSE, THE OFFICE OF ATTORNEY GENERAL HAS SATISFIED ITS OBLIGATION TO RESPOND TO YOUR REQUEST. SHOULD YOU WISH TO CHALLENGE THIS RESPONSE UNDER THE RTKL, YOU MUST FILE AN APPEAL WITH THE RIGHT TO KNOW APPEALS OFFICER OF THE PENNSYLVANIA OFFICE OF ATTORNEY GENERAL, WITHIN FIFTEEN (15) BUSINESS DAYS OF THE MAILING DATE OF THIS LETTER. YOUR APPEAL MUST INCLUDE A COPY OF YOUR ORIGINAL

February 1, 2024

REQUEST AND THIS AGENCY'S RESPONSE, STATE THE GROUNDS UPON WHICH YOU CLAIM YOUR REQUEST SHOULD NOT HAVE BEEN DENIED AND ADDRESS ALL REASONS STATED BY THIS AGENCY FOR ITS DENIAL OF YOUR REQUEST. FAILURE TO FOLLOW THESE INSTRUCTIONS MAY RESULT IN DISMISSAL OF YOUR APPEAL. YOUR APPEAL MUST BE SENT TO THE FOLLOWING:

RIGHT TO KNOW APPEALS OFFICER
OFFICE OF ATTORNEY GENERAL
CIVIL LITIGATION SECTION
15TH FLOOR STRAWBERRY SQUARE
HARRISBURG, PA 17120

Please note that this response is being sent from an unmonitored e-mail address. Do not reply to this e-mail.

Sincerely,

A handwritten signature in blue ink that reads "Sharon K. Maitland".

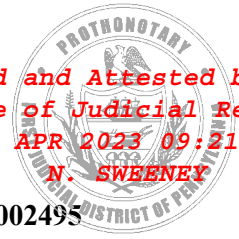
Sharon K. Maitland
Senior Deputy Attorney General
Right to Know Officer

SKM:mae
2023-299

EXHIBIT I

IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)

Filed and Attested by the
Office of Judicial Records
26 APR 2023 09:21 am



JAMES SAVAGE

Plaintiff,

v.

DONALD J. TRUMP,

et al,

Defendants

CASE ID NO.: 211002495

ORDER

**PRAECIPE IN RESPONSE TO
PLAINTIFF'S PRAECIPE FOR
CONTESTED DISCOVERY
MOTION
FROM PRO SE DEFENDANTS
GREGORY STENSTROM AND
LEAH HOOPEES**

(AMENDED) ORDER

AND NOW, this _____ day of _____ 2023 upon consideration of the Defendants Stenstrom's and Hoopes' **PRAECIPE IN RESPONSE TO PLAINTIFF'S PRAECIPE FOR CONTESTED DISCOVERY MOTION** (Control No: 23044066), and **ANSWER** and supporting **MEMORANDUM OF LAW**, in response to Plaintiff's separately filed, but procedurally unified, Plaintiff's **MOTION TO COMPEL** (also Control No: 23044066), this court hereby finds as follows:

1. Defendants Stenstrom's and Hoopes' request that Plaintiff's MOTION TO COMPEL, be **DENIED**, is **GRANTED**.
2. Defendants Stenstrom's and Hoopes' request that Plaintiff's prescriptive, procedural hearing for Discovery AFTER the Case Management Order (CMO) deadline of May 1st, 2023, be **DENIED**, is **GRANTED**.
3. Defendants Gregory Stenstrom's and Leah Hoopes' request for, and leave to submit a separate **MOTION FOR SANCTIONS** for recovery of legal costs and punitive sanctions from Plaintiff Savage and Plaintiff's attorney J. Conor Corcoran, Esquire, is **GRANTED**.

BY THE COURT

Pro Se Defendants Gregory Stenstrom and Leah Hoopes

Gregory Stenstrom, Pro Se
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495
gstenstrom@xmail.net

Leah Hoopes, Pro Se
241 Sulky Way
Chadds Ford, PA 19317
610-608-3548
leahfreedelcopa@protonmail.com

**NOTICE TO PLEAD
To Plaintiff:
You are hereby notified to file a
written response to
Defendants Motion to Dismiss
within ten (10) days from
date of service hereof or a
judgement may be entered
against you.
/s/ Gregory Stenstrom and
Leah Hoopes**

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE
Plaintiff,

v.

DONALD J. TRUMP,

and

RUDOLPH W. GIULIANI,

and

**DONALD J. TRUMP FOR
PRESIDENT, INC.,**

and

RUDOLPH W. GIULIANI, PLLC,

and

JENNA ELLIS,

and

GREGORY STENSTROM,

and

LEAH HOOPES,

and

PHILLIP KLINE,

and

THE THOMAS MORE SOCIETY,

Defendants

CASE ID NO.: 211002495

**PRAECIPE IN RESPONSE TO
PLAINTIFF'S PRAECIPE FOR
CONTESTED DISCOVERY
MOTION
FROM PRO SE DEFENDANTS
GREGORY STENSTROM AND
LEAH HOOPES**

**PRAECIPE IN RESPONSE TO
PLAINTIFF'S PRAECIPE FOR CONTESTED DISCOVERY MOTION
FROM PRO SE DEFENDANTS
GREGORY STENSTROM AND LEAH HOOPEES**

1. Plaintiff's attorney J. Conor Corcoran is desperately and calculatingly attempting to contrive any procedural means to extend Discovery past Judge Cohen's February 14th, 2022, Case Management Order (CMO) Discovery deadline of May 1st, 2023 (in 5 days), and surreptitiously craft a procedural situation that will enable him to file a Motion for Summary Judgement, as is his practice in bringing forth bad faith civil litigation.
2. Defendants Stenstrom and Hoopes request that Plaintiff's bad faith, cynical, and falsely sworn PRAECIPE FOR CONTESTED DISCOVERY MOTION (Control No.: 23044066) prescriptive, procedural hearing be specifically **DENIED** per the attached (above) proposed (AMENDED) ORDER, as part and parcel of, and response to, Plaintiff's separately filed, but procedurally unified, MOTION TO COMPEL (MTC) (also with Control number: 23044066), as Defendants have already responded to the MTC with Motion, Memorandum of Law, and previous proposed Order, for the reasons propounded herein.
3. Plaintiff's attorney Corcoran is attempting to leverage since expired COVID-19 local Philadelphia Court of Common Pleas procedures specific to the subject Praecipec (see Exhibit A, PROTOCOL FOR DISCOVERY MOTIONS FILED ON/AFTER MARCH 15, 2021), as a transparent procedural device to manipulate the administrative Court division between Motions and Discovery Courts, as a calculated dodge to remedy Judge Erdos' DENIAL of Plaintiff's attorney Corcoran's Motion for Extraordinary Relief to delay the CMO schedule for one-year, and administratively securing an order for Discovery past the Discovery Deadline of May 1st, 2023, from a more amenable Judge (presumably Judge Daniel Anders, Supervising Judge for Civil-Trial Division (Discovery), or his assigns, per Exhibit A).
4. Plaintiff's attorney J. Conor Corcoran's has demanded an additional 60-days for Discovery, and is attempting to side-step Judge Erdos, who is assigned to the Motions division under the supervision of Judge Cohen, who recused himself with stated cause that he is a neighbor

of Plaintiff's attorney (Corcoran) during the October 31st, 2022, hearing on Defendants Stenstrom's and Hoopes' MOTION TO PROCEED PRO SE.

5. Judge Erdos presumably saw through attorney Corcoran's nefarious motives for filing for Extraordinary Relief, as a procedural crack and device that Corcoran regularly employs, to delay the CMO schedule one year, and DENIED that Motion, leaving the CMO schedule intact, and the Discovery deadline set for May 1st, 2023.
6. With regard to Contested discovery motions, Per Exhibit A, the COVID-19 Protocol states: *"If a response in opposition of the motion is filed, the Discovery Motion will be listed for a hearing with the appropriate Judicial Team Leader. The hearing will be listed approximately seven (7) to ten (10) days from the expiration of the Response Date. Notice of the date, time, and manner of the hearing will be sent by the Office of Judicial Records to all parties."*
7. Plaintiff has had 437 days, almost 15 months, inclusive of today, April 26th, 2023, to conduct Discovery, since the CMO was entered by Judge Cohen in the docket on February 14th, 2022.
8. Plaintiff's attorney Corcoran sent a singular email (one, eins, uno, (1)), to Defendant Hoopes on March 13th, 2023, and improperly served its RFA's, Interrogatories, and demands for short fuse RFD's, only hours after submitting the aforementioned MOTION FOR EXTRAORDINARY RELIEF, to extend the entire CMO schedule another year, which Judge Erdos sagely DENIED.
9. Plaintiff's attorney Corcoran improperly served its MOTION TO COMPEL under the administratively separate Discovery Court as a mechanism to procedurally cure his negligence and lack of due diligence in adhering to the CMO schedule, in search of a case he has failed to make with Defendants Kline, Ellis, the Thomas More Society, and now Defendants Stenstrom and Hoopes.
10. Defendants Stenstrom and Hoopes were carefully instructed by Judge Erdos before his Order allowing them to proceed Pro Se that he would strictly adhere to federal, state, and local Philadelphia Rules of Civil Procedure with limited judicial discretion for any missteps they might make in the trajectory of this case, at which they are at great financial risk.
11. It was not a mistake that Plaintiff's Attorney filed its MOTION TO COMPEL on April 21st, 2023 at 8:57PM on a Friday night, without email or proper service to Defendant Hoopes,

and also omitting email notice to Defendant Stenstrom, and not unreasonable to conclude that Defendant Stenstrom might fail to notice the Court's cp-e-filing notice, before Monday, or perhaps not at all, making 3-days tick off from the 5-day response time required by local Philadelphia Rules of Civil Procedure.

12. Defendants Stenstrom and Hoopes, were aware of the 5-day deadline, and filed their ANSWER to Plaintiff's MTC, with proposed order, and out of an abundance of caution filed a separate Memorandum of Law, on April 24th, 2023, Monday evening at 10:07PM, with leeway to cure any deficiencies found during Prothonotary review, in time to meet the April 26th, 2023, deadline for response to Plaintiff's MTC.
13. Plaintiff's attorney J. Conor Corcoran then filed the subject PRAECIPE FOR CONTESTED DISCOVERY MOTION separately from its MOTION TO COMPEL on Monday at 1:03PM, three days later, which Defendant Stenstrom received cp-e-filing notice for, again completely omitting email service to either Defendant.
14. Defendant Stenstrom called Defendant Hoopes and together they reviewed and researched what reasons Plaintiff attorney Corcoran might have for filing its PRAECIPE separately, and noted that the local rules required a respondent PRAECIPE was due within 10-days, but initially missed the fact that Plaintiff's PRAECIPE was assigned the same Control No: 23044066, as Plaintiff's MTC, and that it did not have a corresponding Certification Due Date of April 28th, 2023, and Response Date of May 5th, 2023 that was included on the originating MTC, with the Response Date falling after the May 1st, 2023, Discovery deadline specified by the CMO.
15. Defendants Stenstrom and Hoopes did make note that Plaintiff's Attorney DID NOT EMAIL THE PRAECIPE to either of them, or include a Certificate of Service, and the disparity in days to respond (5-days for MTC and 10-days for PRAECIPE), and tabled their discussion to continue to independently research if a separate response was required, in light of the facts that they had already ANSWERED Plaintiff's MTC, and that their (Defendants') MTD had been left unanswered by Plaintiff.
16. On April 25th, Tuesday, at 9:34AM, Defendant Stenstrom received cp-e-filing notice that Defendants Stenstrom's and Hoopes' ANSWER to Plaintiff's MTC had been rejected by the Prothonotary's office (again, Defendant Hoopes does not receive cp-e-filing notices

from the Court, and Plaintiff attorney Corcoran did NOT email notice to either of Defendants Stenstrom or Hoopes).

17. Defendant Stenstrom called the Prothonotary's office, as directed by the cp-e-filing rejection, and initially argued that the appropriate filing of their ANSWER to Plaintiff's MTC should be under the Motions division, contrary to the Prothonotary informing him it had been rejected because Plaintiff's attorney Corcoran's MTC was administratively a Discovery Motion.
18. Defendant Stenstrom stated to the Prothonotary that the reason they thought it should be filed with the Motions is that a significant point of its argument was that Plaintiff's attorney had seemingly ignored Defendants Stenstrom's and Hoopes' MOTION TO DISMISS, and had instead contrived to turn the trajectory of the case into a procedural Discovery matter to administratively extend Discovery, giving Plaintiff's attorney Corcoran another bite at the Discovery apple with a 60+ day extension beyond the CMO Discovery deadline, or perhaps cause for a future appellate Court to err on the side of Discovery.
19. Whatever the outcome might be with Defendants Stenstrom's and Hoopes' MTD, or their Answer to Plaintiff's MTC, or this Praecipe, Plaintiff's attorney's devious machinations to procedurally extend Discovery with bad faith filings of its MTC and separate Praecipe, deceitful Certificate of Good Faith, and Defendants Stenstrom and Hoopes then reasonable ignorance of, and confusion regarding local Philadelphia COVID-19 administrative protocols, might at a minimum keep President Trump and Mayor Giuliani in play as Defendants by the Plaintiff.
20. Defendants submitted a Response that is compliant with F.R.C.P 12(b), and 234 Pa. Code § 575 (B), that being, their **MOTION TO DISMISS** (MTD), (Control No.: 2304174), which was timely filed on April 10th, 2023, and they argued in their ANSWER to Plaintiff's MTC, that they did not have a duty to provide any further response to Plaintiff at this time, initially not knowing, or understanding the difference between the Motions and Discovery divisions, and their separate litigative trajectories.
21. Of judicial note, and for demonstrative pattern of Plaintiff's attorney J. Conor Corcoran abuse of Rules of Civil Procedure, Defendants Stenstrom and Hoopes research of previous cases in which Corcoran employed similar devices are illustrated in *McDavid et al. v*

Corcoran, adjudicated in the Philadelphia Court of Common Pleas, Case ID: 170303206, originally filed March 29th, 2017.

22. In this case, Plaintiff McDavid filed a Dragonetti action against Defendant Corcoran, “*for wrongful civil proceedings, alleging that [Mr. Corcoran] was grossly negligent and/or lacked probable cause to bring the underlying case,*” and Defendants Stenstrom and Hoopes noted that that case unfolded in remarkably similar fashion to the subject *Savage v Trump et al*, as follows:

- a. A Case Management Order (CMO) in *McDavid v Corcoran* was Ordered by Judge Glazer on November 14th, 2017, with a Discovery deadline of April 2nd, 2018.
- b. Similar to the subject *Savage v Trump, et al.*, case, Corcoran filed a Motion for Extraordinary Relief on February 2nd, 2018, with Judge Glazer extending all deadlines 90 days on February 5th, 2018, extending Discovery deadline to February 2nd, 2018.
- c. Corcoran then resisted Plaintiff McDavid’s discovery, and ignored Judge Glazer’s Orders to Compel discovery, resulting in Plaintiff McDavid filing for Extraordinary relief on May 7th, 2018, which was granted by Judge Glazer, further extending the CMO schedule another 60-days, and a new Discovery deadline of September 3rd, 2018.
- d. Corcoran again filed for Extraordinary Relief on May 15th, 2018, which Judge Glazer immediately DENIED.
- e. With the Discovery Deadline of September 3rd, 2018, fast approaching, and no docket entries after the May 15th, 2018, Order, Corcoran again filed for Extraordinary Relief on August 24th, 2018, only 10-days before the September 3rd, 2018, Discovery Deadline, which Judge Glazer again DENIED on August 27th, 2018.
- f. Apparently, during the interim of no docket entries from May to August, Corcoran had emailed draconian subpoenas to three or four unrelated third parties with 13 categories of demand for document production that Plaintiff McDavid argued (via email) were not relevant to the case, to which Plaintiff McDavid finally formally filed a docketed OBJECTION on August 28th, 2018.

- g. On August 31st, 2018, only three (3) days before the already twice moved Discovery Deadlines from the original Deadline of April 2nd, 2018 to September 3rd, 2018, deadline, and two separate Denials of Corcoran's Motions for Extraordinary Relief, Corcoran file a Motion for Discovery and Motion to Overrule Plaintiff's Objections to Corcoran's subpoena's and demanded a hearing for September 24th, 2018, 21-days after the September 3rd, 2018 Discovery Deadline, in almost identical fashion to his MTC filed against Defendants Stenstrom, Hoopes, Trump and Giuliani only days before the Discovery deadline in the subject Savage v Trump et al., case.
- h. With that last minute Discovery filing, Corcoran procedurally achieved in the Court's Discovery division and procedures what he could not do in the Motions division and procedures in light of Judge Glazer's DENIAL of Corcoran's multiple Motions for Extraordinary Relief, exploiting a crack and contradiction in the Philadelphia Court of Common Pleas Rules of Civil Procedure.
- i. Corcoran then immediately filed another Discovery Motion to Strike Plaintiff's objections, now demanding Plaintiff produce all subpoenaed documents within 10-days, which Judge Glazer inexplicably, but apparently properly, GRANTED without mention of the now Expired Discovery Deadline of September 3rd, 2018, presumably because respondent's (Plaintiff McDavid) Objection to Discovery triggered a procedural hearing in contravention to the CMO Discovery Deadline.
- j. Corcoran then filed a Motion for Summary Judgement to Dismiss the case on October 15th, 2018 for reason that Plaintiff McDavid had not fully responded to Corcoran's subpoena's for document production that Corcoran demanded in his Motion for Discovery filed only 3-days before Discovery deadline, and one (1) day after the Discovery deadline, having successfully manipulated the Discovery rule triggering a *"hearing will be listed approximately seven (7) to ten (10) days from the expiration of the Response Date. Notice of the date, time, and manner of the hearing will be sent by the Office of Judicial Records to all parties,"* using the administrative Rules of Civil Procedure and Office of Judicial Records, to circumvent and bypass the Judicial Case Management Order that Ordered a Discovery Deadline of September 3rd, 2018.

- k. Plaintiff McDavid responded by refiling his original Objections to Corcoran's subpoenas on October 19th, 2018, within the 5-day requirement for response to Motion for Discovery, and filed a 43-page Response in Opposition, a 36-page Memorandum of Law, and sixteen (16) Exhibits, in response to Corcoran's Motion to Dismiss, apparently too late, having not objected to the procedural crack that Defendants Stenstrom and Hoopes are propounding in this Praecipe.
- l. Judge Glazer entered an Order and Opinion on November 26th, 2018, GRANTING Corcoran's Motion for Summary Judgment, DISMISSING the case with PREJUDICE.
- m. Request for Reconsideration, Denial, Appeal, and Notices ensued.
- n. Now Appellant McDavid filed a procedurally deficient Appellate Brief failing to divide the argument section of its brief, but the Superior Court still considered the merits.
- o. Of particular note, and similar to the subject Savage v Trump, et al., case, is that Corcoran employs the use of emails, both sent, allegedly sent, and omitted, to craft a narrative of uncertainty versus docketed judicial notice, as he has done in the case of Defendants Stenstrom and Hoopes, alternately sending, and failing to send emails, and reiteratively improperly serving Defendants, which was a common theme in the approximately 240+ filings to date.
- p. In conclusion of this illustrative example, Appellant McDavid failed to prevail because he did not vigorously and diligently document interparty emails and agreements regarding "the favorable termination element of a Dragonetti cause of action" in the underlying case, despite prevailing, and the appellate Court found that the Philadelphia Court of Common Pleas (Judge Glazer) did not abuse its discretion in its determination, and affirmed its Order.
- q. This court further noted that:

[i]n [Bannar], this Court upheld a plaintiff's Dragonetti Act verdict on the basis that the plaintiff's voluntary dismissal constituted a final determination in favor of the defendants. We did so because the peculiar, troubling evolution of that case, which suggested beyond any credible doubt that the suit in question was brought for an improper purpose,

“tend[ed] to establish neither [the plaintiffs] nor [the] attorneys were attempting to properly adjudicate the claim.” (underline emphasis by Defendants Stenstrom and Hoopes) “This Court observed that “[a] last-second dismissal in the face of imminent defeat is not favorable to [Dragonetti plaintiffs]. **Dragonetti plaintiffs] did not answer the bell in the fight they started, which is a victory for the other side.**”(emphasis bold and underline by Defendants Stenstrom and Hoopes) *Bannar*, 701 A.2dat 248.

23. The lesson learned in *McDavid et al v Corcoran* is that while both Judge Glazer and the appellate Court clearly recognized, and the appellate Court plainly stated, that Corcoran had brought forth a malicious, improper, bad faith complaint, that McDavid **“did not answer the bell,”** and was a victim of his own folly in not taking all due diligence to protect himself and his Co-Plaintiff’s from an unscrupulous, and dishonest lawyer.
24. Defendants Stenstrom and Hoopes do not intend to make the same mistake, hence this lengthy and exhaustive PRAECIPE in response to Corcoran’s PRAECIPE and machinations, and multiple requests for leave by the Court to file separate MOTION FOR SANCTIONS, Dragonetti Act damages, and their now certain request for SLAPP hearing postmortem to the relief they seek from the Court to GRANT Defendants MOTION TO DISMISS, and DENY Corcoran’s bad faith MTC, Praecipec and duplicitous Certificate of Good Faith.
25. A primary underhanded strategy exploited by Corcoran is that similar to Corcoran’s subpoenaed demand for 13 categories of documents already in evidence and adjudicated as FACTS in *McDavid et al. v Corcoran*, and Plaintiff McDavid’s reasonable objections as described above, Corcoran’s apparent bad faith intent in presenting irrelevant, excessive, abusive, and invasive interrogatories appear to be crafted to intentionally elicit reasonable emotional objections with a purposeful, strategic intent to ensure that an opposing party will be unresponsive in whole, or in part, to his outrageous line of questioning, in order to engage the Rules of Civil Procedure aspects of the Discovery process to the detriment of an unsuspecting party, without having to trouble himself with bringing any actual facts or evidence of his own in his bad faith filings, and instead seek Summary Judgement for procedural missteps, failure to meticulously document his sporadic out-of-band emails to

opposing parties, improper service, and unethical practices in filing or fomenting multiple motions for “extraordinary relief” (four (4) in the McDavid case, and two, so far, in the subject Savage v Trump et al. case), with respective delays, in a calculated pattern of exhausting both assigned Judges and opposing parties with frivolous filing, after frivolous filing.

26. Corcoran falsely and baselessly claims in his bad faith Motion to Compel that Defendants Stenstrom, Hoopes, Trump and Giuliani (he does not specify which):

“have an established track record of preposterous delays and a concerted, cavalier attitude towards complying with Court Orders, and their further delays in responding to discovery cannot be allowed to continue, warranting entry of the attached Order compelling written responses within the next ten (10) days, and depositions within the next sixty (60) days.”

27. Nothing could be further from the truth, and Defendants Stenstrom and Hoopes affirm here, and again in their attached Verification, that both their former attorney, Thomas Carroll, and they, have been meticulously observant of timeliness, and that at least in the case of now PRO SE Defendants Stenstrom and Hoopes, that they have been just as meticulous in following the Courts local Rules of Civil Procedure in their filings, as directed by Judge Erdos when he granted them leave to proceed Pro Se, if perhaps deficient in their lay-person knowledge and application of the law.
28. With regard to Corcoran’s strategic intent to foment a circumstance where Defendants are either deficient, or untimely, in fully responding to abusive elements of his post Discovery deadline demands for Discovery, Corcoran’s voluminous 12-page, 61-question Interrogatory to Defendant Stenstrom is illustrative of his contempt and deliberate malfeasance in the regard (provided in full in Defendants Stenstrom’s and Hoopes’ MOTION TO DISMISS).
29. Corcoran shows absolutely no shame or ethical compunction in probing the suicide of Defendant Stenstrom’s son on February 6th, 2021, well after Stenstrom’s filing of lawsuit on November 4th, 2020, against the Delaware County Board of Elections (which documented in detail Plaintiff Savage’s election law and criminal law violations), and his November 7th, 2020 sworn Declaration, and his November 25th, 2020 eye-witness

testimony before the Pennsylvania Senate Majority Policy Committee (Gettysburg), and other protected 1st Amendment speech, to wit:

“55. Is it true that you have pursued your allegations of vote tampering against the Plaintiff herein, as set forth in the pending Complaint, to cope with the death of your son, Brian Stenstrom, as set forth in your recent book, The Parallel Election, and that you had long before the 2020 election developed preconceived convictions that an allegedly fraudulent Presidential Election would be conducted in 2020? If not, please explain what facts or documentation you have to support your answer.”

30. The calculated irrelevance, deviousness, and plain nastiness of this unconscionable assault on Defendant Stenstrom, in the guise of an interrogatory, screams “***do NOT respond to this outrageous interrogatory, so I can use it as an instrument to extort a Motion for Summary Judgement,***” and the most barbaric application of Sun Tzu’s “The Art of War” admonition that “when the enemy is making mistakes, let them.”
31. Corcoran goes well beyond the event horizon of adversarial advocacy and does not just bend the Rules of Professional Conduct and Ethics, he is openly contemptuous of them and virtually spits on them, treating the Courts as a platform for unrestricted guerilla warfare. In this case however, Defendant Stenstrom has actually been to war, is emotionally unmoved by Corcoran’s wanton ugliness, and both Defendants Stenstrom and Hoopes have had to personally and regrettably deal with the most corrupt Gollum’s that have turned our jury boxes into litter boxes in the past several years, and dead pan stoic in stating uncomfortable truths with regard to election fraud and corrupt government officials.
32. The preceding paragraph might seem extraneous and irrelevant but is a necessary predecessor to remarking on Corcoran’s Machiavellian modus operandi to dare an opposing party to make judicial note that Corcoran proudly markets and proclaims that he is “America’s first gay divorce attorney” (a dubious and bombastic claim at best), and that his chosen, favorite venue for abuse is the Court’s Discovery process, and waiting until the Discovery deadlines are days away, or already past, triggers a hearing which is supervised by the Honorable Daniel J. Anders, Supervising Judge of the Civil-Trial Division assigned to preside over, or assign Judges to, Corcoran’s triggered Discovery hearings in accordance with PROTOCOL FOR DISCOVERY MOTIONS FILED ON/AFTER MARCH 15. 2021.

33. Judge Anders is nationally recognized as “the first openly gay male judge to serve on the Philadelphia Court of Common Pleas,” and has actively embraced this media characterization.
34. While uncomfortable to most, toxic and radioactive to some, and head-explodingly triggering to a few, to plainly state these self-identifying sexuality characterizations in the body of a legal filing, they are merely facts in evidence that must be considered as to the “why” attorney Corcoran has been so notoriously been permitted latitude to bring forward bad faith litigation, and so openly crap all over any sense of judicial propriety and sense of justice his victims might once have held hope for in the Court.
35. Defendants Stenstrom’s and Hoopes’ intent in stating the obvious is not to cast aspersion or question the Honorable Judge Anders’ integrity, but to put a point on Esquire Corcoran’s own cynicism and malignancy, and what can only be inferred as palpable fear amongst the esquire and judiciary classes who remain silent to the disgusting abuses Corcoran has wrought on the Courts and his victims.
36. Defendants Stenstrom and Hoopes are private citizens, who valued their anonymity and quiet, prosperous lives, and only wanted to perform public service as certified poll watchers in the 2020 general election, and protect their families, homes, and community. They have remained firm and consistent in their sworn testimonies since November 4th, 2020 in a storm of abuse from public officials, with their only goal since, being an opportunity to present their FACTS and EVIDENCE before a willing Court or other trier of fact before a jury of their peers, and once and for all, either putting a fork in the false narrative of “the safest and most secure election in history,” or be rebuked.
37. Either way, Plaintiff James Savage and his equally repugnant attorney, J. Conor Corcoran, and anyone else whom might attempt to harass, intimidate, or attack Pro Se Defendants Stenstrom and Hoopes will get a wheelbarrow full of unflinching FACTS, EVIDENCE, and TRUTH from them, and a fight with every filing.
38. Whether the Court deigns to provide Defendants Stenstrom and Hoopes with their righteous requests for relief and remedy they seek, or not, Attorney Corcoran has already filed Writ to bring another defamation claim against them, this time in the Delaware County Court of Common Pleas, where they live, with the named Plaintiff being Mr. James Allen, an export from the Chicago machine, and Director of Elections in their County since the

2020 election, where Defendants Stenstrom and Hoopes expect more of the same underhanded antics from Corcoran without the benefit of their now two and a half years as Plaintiffs where not a single evidentiary hearing has been permitted, never mind a day in court before a jury, with that cycle repeating as long as it needs to, until that day happens.

39. Defendants Stenstrom's and Hoopes' will not quit until the law prevails as it has been written and intended by those who have chosen lives of public service, which is the heart of the United States of America, and have equal courage to not bend in the wind of "judicial climate" and "political correctness."

REMEDY

40. **Whereas** Defendants Stenstrom's and Hoopes' request that in consideration of their **PRAECIPE IN RESPONSE TO PLAINTIFF'S PRAECIPE FOR CONTESTED DISCOVERY MOTION** (Control No: 23044066), and **ANSWER** and supporting **MEMORANDUM OF LAW**, in response to Plaintiff's separately filed, but procedurally unified, Plaintiff's **MOTION TO COMPEL** (also Control No: 23044066), this court hereby finds as follows:

- a. Defendants Stenstrom's and Hoopes' request that Plaintiff's **MOTION TO COMPEL**, be **DENIED**.
- b. Defendants Stenstrom's and Hoopes' request that Plaintiff's prescriptive, procedural hearing for Discovery AFTER the Case Management Order (CMO) deadline of May 1st, 2023, be **DENIED**.
- c. Defendants Gregory Stenstrom's and Leah Hoopes' request for, and leave to submit a separate **MOTION FOR SANCTIONS** for recovery of legal costs and punitive sanctions from Plaintiff Savage and Plaintiff's attorney J. Conor Corcoran, Esquire.

Respectfully submitted,



Date: 26APR2023

LEAH HOOPEES
241 Sulky Way
Chadds Ford, PA 19317
Telephone: 610-608-3548
leahfreedelcopa@protonmail.com



Date: 26APR2023

GREGORY STENSTROM
1541 Farmers Lane
Glen Mills, PA, 19342
Telephone: 856-264-5495
gstenstrom@xmail.net

VERIFICATION

We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Motion to Dismiss are true and correct to the best of our knowledge, information and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



GREGORY STENSTROM

PRO SE



LEAH M. HOOPES

PRO SE

Dated: 26APR2023

EXHIBIT A

PROTOCOL FOR DISCOVERY MOTIONS FILED ON/AFTER MARCH 15, 2021



**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COURT OF COMMON PLEAS**

Monday, March 1, 2021

TRIAL DIVISION – CIVIL

NOTICE TO THE BAR

PROTOCOL FOR DISCOVERY MOTIONS FILED ON/AFTER MARCH 15, 2021

Praecipes and Certifications Regarding Discovery Motions

For all Discovery Motions filed on/or after March 15, 2021, the Office of Judicial Records shall set a *Certification Due Date* of seven (7) days from the date of filing the motion. No later than the *Certification Due Date*, only the movant (not the respondent) shall file in the *Discovery Court Filings* section of the Civil Electronic Filing System (EFS) the appropriate praecipe and certification for the Court's review as follows.

- (1) **Withdrawn discovery motions:** For all Discovery motions that are withdrawn, only the movant (not the respondent) shall file a Praecipe to Withdraw, identifying the control number, and identifying the party or parties against whom the motion is pending, with the relief sought. See the attached form for the appropriate format to be used for this Praecipe to Withdraw.
- (2) **Discovery motions entered by agreement:** For all Discovery motions entered by agreement, only the movant (not the respondent) shall file a Praecipe to Enter Discovery Order By Agreement. The praecipe shall identify the control number, and identify the party or parties against whom the motion is pending, with the relief sought. This praecipe shall request that the Office of Judicial Records enter, upon Court review, the order marked BY AGREEMENT and prepared by counsel for the movant with an appropriate certification that the other party(s) agree to the terms of the order. Counsel for the movant shall retain written proof of the agreement/consent from all counsel in the matter to the stipulated order. See the attached form for the appropriate format to be used for the praecipe and certification of discovery motions entered by agreement.
- (3) **Uncontested discovery motions:** For all uncontested Discovery motions, only the movant (not the respondent) shall file a Praecipe to Enter Uncontested Discovery Order. The praecipe shall identify the control number, and identify the party or parties against whom the motion is pending, with the relief sought. This praecipe shall request that the Office of Judicial Records enter, subject to review, the order marked UNCONTESTED prepared by

Page 1 of 9

counsel for the movant with an appropriate certification that the motion is uncontested by the party or parties against whom the motion is pending. Counsel for the movant shall retain written proof of the consent from all counsel in the matter to the order and the fact that it is uncontested. See the attached form for the appropriate format to be used for the praecipe and certification of uncontested discovery motions.

Note: If the movant is unsuccessful in reaching the respondent to obtain the respondent's position, the motion is presumed Contested per paragraph 5.

- (4) **Discovery motions involving a third party:** For all Discovery motions concerning any person or entity which is not a party to the applicable action (collectively referred to as a "third party") which are by agreement or uncontested, only the movant (not the respondent) shall file a Praecipe to Enter Discovery Order Against a Third Party. The praecipe shall identify the control number, and identify the third party or parties against whom the motion is pending, with the relief sought. This praecipe shall request that the Office of Judicial Records, subject to review, enter the order by agreement or uncontested with an appropriate certification that the motion is by agreement or uncontested. The certification shall also set forth the means of service of the motion and include a valid electronic means of contacting the third party against whom the motion is pending. Counsel for the movant shall retain written proof of the consent from the third party to the order and the fact that it is by agreement or uncontested. See the attached form for the appropriate format of the requisite praecipe and certification to be used for submission to the Court hereunder. Movant shall provide the third party with a copy of the Order.
- (5) **Contested discovery motions:** For all contested Discovery motions (including third party motions), only the movant (not the respondent) shall file a Praecipe for Contested Discovery Motion. The praecipe shall identify the control file number, and identify the party or parties against whom the motion is pending, with the relief sought. This praecipe shall confirm that counsel for the movant has conferred or made reasonable efforts to confer with the opposing party or third party and/or its counsel to resolve the dispute and despite reasonable efforts, the parties are unable to resolve the dispute without court intervention. See the attached form for the appropriate format to be used for this praecipe and certification.
- Note:** If the movant is unsuccessful in reaching the respondent to obtain the respondent's position, the motion is presumed Contested.

Be Advised: If a movant must file a unique praecipe and certification that relates to less than all parties subject to the filed Discovery Motion, Discovery Court Program staff should be consulted before filing. For example, a movant may withdraw a Discovery Motion as it relates to defendant A, but may need to file a certification that marks the motion contested as it relates to defendant B. In this and similar circumstances, Discovery Court Program staff should be consulted for filing protocols.

Be Advised: If the movant fails to file any of the praecipes or certifications described above, the Discovery Motion will be marked “dismissed without prejudice” by the Office of Judicial Records after the expiration of the *Response Date*.

Discovery Motions Certified Contested

The Office of Judicial Records shall set a *Response Date* of seven (7) days from the *Certification Due Date* for all Discovery Motions filed on/or after March 15, 2021. If the movant certifies a Discovery Motion as contested, all respondents shall file a response by the established *Response Date* in the *Discovery Court Filings* section of the Civil Electronic Filing System (EFS).

If a Discovery Motion is certified Contested, and no response is filed within seven (7) days, the motion will be assigned to a judge for review as unopposed.

If a response in opposition of the motion is filed, the Discovery Motion will be listed for a hearing with the appropriate Judicial Team Leader. The hearing will be listed approximately seven (7) to ten (10) days from the expiration of the *Response Date*. Notice of the date, time, and manner of the hearing will be sent by the Office of Judicial Records to all parties.

If a Discovery Motion is certified contested, but subsequently determined to be agreed upon, uncontested, or withdrawn, only the movant (not the respondent) shall file the appropriate praecipe and certification with the Office of Judicial Records as described above. Subsequently, the scheduled hearing will be canceled and closed on the docket and the order shall be entered by agreement, uncontested, or withdrawn as described above.

Be advised: All praecipes and certifications described above shall be made subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

Questions regarding these protocols and any related filing procedures should be directed to Peter Divon, Manager, Discovery Court Program, at Peter.Divon@courts.phila.gov.

Honorable Lisette Shirdan-Harris
Administrative Judge
Trial Division

Honorable Daniel J. Anders
Supervising Judge
Trial Division – Civil

Honorable Gary S. Glazer
Supervising Judge
Trial Division – Commerce

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
 PHILADELPHIA COURT OF COMMON PLEAS
 TRIAL DIVISION – CIVIL

	:	
	:	
	:	
Plaintiffs	:	COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA
	:	
v.	:	_____ TERM, 20__
	:	
	:	NO. _____
	:	
Defendants	:	
	:	

**PRAECIPE TO ENTER THIRD PARTY UNCONTESTED OR
 RESOLVED BY AGREEMENT DISCOVERY ORDER**

To the Office of Judicial Records:

Pursuant to the Court’s Discovery protocol and subject to the below certification, kindly, upon court review enter the discovery order, attached hereto as Exhibit A which seeks relief including **[movant must enter relief sought here and whether it is by agreement or uncontested]**.

I, attorney for [PARTY NAME], hereby certify that, on [DATE] and in compliance with Pa.R.C.P. 440, I served third party respondent [NAME OF ENTITY SUBJECT TO MOTION] with a copy of the motion to [STATE WHAT TYPE OF MOTION e.g. enforce subpoena, for protective order, or other] filed on [DATE] with Control number [CONTROL NUMBER]. The respondent was properly served with said motion by [DESCRIBE MANNER OF SERVICE].

I also certify that, on [DATE], [THE SUBPOENA or MOTION] was properly served on respondent [NAME OF ENTITY SUBJECT TO MOTION] in compliance with Pa.R.C.P. 234.2 by [DESCRIBE MANNER OF SERVICE].

I further certify that I conferred with a representative of the respondent [NAME OF PERSON OR PARTY SUBJECT TO MOTION] and that the discovery motion filed on [DATE] with Control number [CONTROL NUMBER] is [STATE WHETHER UNCONTESTED OR RESOLVED BY AGREEMENT]. The representative for respondent [NAME OF PERSON OR PARTY SUBJECT TO MOTION] can be electronically contacted at [ELECTRONIC CONTACT]. A copy of the discovery order to which respondent [NAME OF PERSON OR PARTY SUBJECT TO MOTION] consents to entry as [UNCONTESTED OR BY AGREEMENT] is attached hereto as Exhibit A.

I make this certification subject to the penalties of 18 Pa.C.S.A. § 4904 regarding unsworn falsifications to authorities.

I hereby certify that I have provided a copy of the attached Order to the referenced respondent and I have maintained a written confirmation that this Motion is [STATE WHETHER UNCONTESTED OR BY AGREEMENT].

BY: _____, Esquire

Attorney for [MOVANT]

Date:

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE

Plaintiff,

v.

DONALD J. TRUMP,

and

RUDOLPH W. GIULIANI,

and

**DONALD J. TRUMP FOR
PRESIDENT, INC.,**

and

RUDOLPH W. GIULIANI, PLLC,

and

JENNA ELLIS,

and

GREGORY STENSTROM,

and

LEAH HOOPES,

and

PHILLIP KLINE,

and

THE THOMAS MORE SOCIETY,

Defendants

CASE ID NO.: 211002495

CERTIFICATE OF SERVICE

FOR

MOTION TO DISMISS

COMPLAINT AGAINST

DEFENDANTS

GREGORY STENSTROM

AND

LEAH HOOPES

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Defendants Stenstrom and Hoopes Motion to Dismiss was served upon all parties at the addressees below on the date indicated below:

J. Conor Corcoran, Esquire
LAW OFFICE OF J. CONOR CORCORAN, P.C.
1650 Market Street, Suite 3600
Philadelphia, PA 19103
conor@jccesq.com
Counsel for Plaintiff

Michael T. Madaio, Esq.
HABBA MADAIO & ASSOCIATES LLP
1430 U.S. Highway 206, Suite 240
Bedminster, NJ 07921
mmadaio@habbalaw.com
Attorney for Donald J Trump and Donald J. Trump for President, Inc.

Bruce Castor, Esquire
VAN DER VEEN, HARTSHORN, & LEVIN
1219 Spruce Street
Philadelphia, PA 19107
bcastor@mtvlaw.com
Counsel for Giuliani and Giuliani PLLC

Joseph Sibley, Esquire
CAMARA & SIBLEY, LLP
1108 Lavaca St.
Austin, TX 78701
sibley@camarasibley.com
Counsel for Giuliani and Giuliani PLLC

Lee J. Janiczek, Esquire
LEWIS BRISBOIS BISGAARD & SMITH, LLP
550 E. Swedesford Rd., Suite 270
Wayne, PA 19087
Lee.Janiczek@LewisBrisbois.com
Counsel for Thomas Moore Society

Matthew H. Haverstick, Esq. and Shohin H. Vance, Esquire
KLEINBARD LLC
Three Logan Square
1717 Arch Street, 5th Floor Philadelphia, PA 19103
(215) 568-2000
mhaverstick@kleinbard.com
svance@kleinbard.com
Counsels for Defendant Jenna Ellis



GREGORY STENSTROM
PRO SE



LEAH M. HOOPES
PRO SE

Dated: 26APR2023

EXHIBIT J

JEAN DESIR
816 South 20th Street
Philadelphia, PA 19146
Plaintiff

v.

J. CONOR CORCORAN, ESQUIRE
One Penn Center, Ste. 1130
Philadelphia, PA 19103
Defendant

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
FEBRUARY 2009
NO. 003216

DATE: 04/23/09 TIME: 04:36
TICKET NO: 445603
CASE NO: 090203216
TOTAL AMT: \$ 7.00

Register 1 282
CASHIER: PRM
CUSTOMER: Cash walk-in customer

2009 APR 23 PM 4:38
RECEIVED

7.00

Desir Vs J Corcoran-CMPLT



09020321600008

NOTICE

AVISO

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you

I e han demandado a usted en la corte. Si usted quiere defenderse de estademandas expuestas en las paginas siguientes, usted tiene veinte (20) dias deplavoal partir de la fecha de la demanda y la notificacion, llacc lalta a senta una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de s?? persona. Sea a visado que si ysted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previa aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perde? dinero o sus propiedades o otros de rechos importantes para usted.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIAMENTE SI?? NO LLENE ABOGADO O SI NO LLENE EL DINERO SUFFICIENTE PARA PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE INCUENIRA ESCRIBA ABAJO PARA AVERIGUAR DONDE SI PUEDI CONSEGUIR ASISIENCIA LEGAL.

Lawyer Reference Service
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: 215-238-6333
TTY: 215-451-6197

Servicio de Referencia Legal
Uno Reading Centro
Filadelfia, PA 19107
Telefono: 215-238-6333
TTY: 215-451-6197

JEAN DESIR	:	
816 South 20 th Street	:	
Philadelphia, PA 19146	:	
Plaintiff	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
v.	:	FEBRUARY 2009
	:	NO. 003216
J. CONOR CORCORAN, ESQUIRE	:	
One Penn Center, Ste. 1130	:	
Philadelphia, PA 19103	:	
Defendant	:	

COMPLAINT

I. PARTIES

1. Plaintiff, Jean Desir, is an adult who resides at the above address .

2. Defendant, J. Conor Corcoran, Esquire, is an attorney licensed to practice law in the Commonwealth of Pennsylvania with an address as set forth above.

II. BACKGROUND

3. Shortly after January 12, 2005, Plaintiff retained the legal services of Defendant Corcoran on a criminal matter.

4. Defendant was to provide legal representation to Plaintiff with regard to the criminal charges brought by the Philadelphia District Attorney deriving out of an accident that occurred on or about January 12, 2005.

5. On January 12, 2005, Plaintiff, without having the mental

capacity to understand what he was doing, caused the vehicle in which he was driving to rear-end, at a high rate of speed, the vehicle being occupied by Brandon Stone.

6. Among other things, at the time of the accident, Plaintiff suffered from schizoaffective disorder, which requires psychiatric treatment and medication.

7. At the time of the accident, Plaintiff was suffering from an acute manic episode with psychotic features which exacerbated his underlying psychiatric condition.

8. At the time of the accident, Plaintiff was legally insane, that is his condition was such that he did not know what he was doing was wrong and lacked the mental capacity to know or appreciate the wrongfulness of his conduct.

9. At the criminal jury trial, Plaintiff defended his actions on the basis that he was legally insane and did not have the mens rea to commit any crime, let alone aggravated assault.

10. The prosecution argued that Plaintiff was mentally ill, but guilty.

11. The jury agreed with the prosecution and entered a verdict against Plaintiff as guilty but mentally ill.

12. Defendant Corcoran failed to obtain evidence that was readily available that would have acquitted Plaintiff.

13. Defendant Corcoran failed to call witnesses that were available to testify - - whose testimony would have assisted in showing that Plaintiff was out of his mind and legally insane on January 12, 2005.

14. Defendant failed to offer testimony and an expert opinion of an appropriately credentialed forensic psychiatrist that Plaintiff was legally insane at the time of the accident.

15. Defendant Corcoran failed to supply Plaintiff's medical expert with all of Plaintiff's medical records, including Plaintiff's prison medical records, describing Plaintiff's condition within 24 hours of the accident, which would have supported Plaintiff's case that he was in fact legally insane at the time of the accident.

16. Defendant Corcoran failed to cross exam the Prosecution's medical expert with all available medical records depicting Plaintiff as being legally insane.

17. As a result of Defendant's professional negligence, Plaintiff was found guilty and caused to be incarcerated for a period of seven months.

COUNT I - NEGLIGENCE

18. Plaintiff incorporates paragraphs 1 through 17 as though same were fully set forth at length herein.

19. As set forth above, Defendant Corcoran was responsible for performing all duties and obligations incumbent upon him as Plaintiff's criminal counsel, including trial preparation

20. Defendant Corcoran, as an attorney, owed a duty to Plaintiff as Plaintiff's attorney, to perform all legal work in a professional, careful, attentive, diligent and reasonable manner.

21. As set forth above, Defendant breached this duty by failing to properly perform the following:

- i. Failing to properly prepare for trial;
- ii. Failing to obtain an appropriate expert;
- iii. Failing to provide said expert with all relevant medical records;
- iv. Failing to offer material testimony at trial;
- v. Failing to present/prepare necessary documentation during the course of Plaintiff's case;
- vi. Generally failing to properly and timely prosecute Client's case.

23. In failing to perform said duties, Defendant's conduct fell below the standard of care for attorneys under the circumstances.

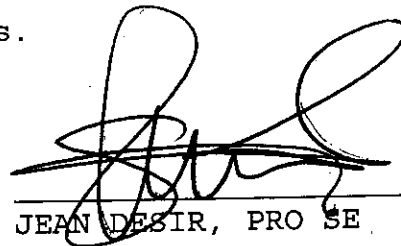
24. In failing to properly perform said duties, as more fully set forth above, and below, Defendant failed to exercise reasonable

care, skill, diligence, knowledge normally/ordinarily possessed by other attorneys similarly situated and, where applicable criminal law specialists.

25. As more fully set forth above, Defendant's malpractice / negligence has caused Client to suffer damages.

26. Defendant Corcoran is therefore liable to Plaintiff for compensatory damages and disgorgement of fees paid to himself, plus consequential damages, including, but not limited to, reasonable legal expenses, attorney fees and costs in prosecuting this legal malpractice claim.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an award in his favor and against Defendant, plus interest, costs and attorney's fees.



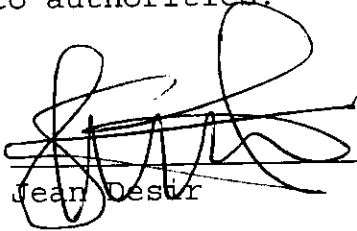
JEAN DESIR, PRO SE
816 S. 20th Street
Philadelphia, PA 19146
(215) 545-6178

VERIFICATION

I, Jean Desir, Plaintiff in this Action, hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief.

I understand that the statements made in said Pleading are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Date: 4-22-09



Jean Desir

EXHIBIT K



OPINION



A Twitter feud with the District Attorney turns ugly

A pilfered photo gives rise to a federal case



District Attorney Seth Williams, due in federal court yesterday to defend himself in a lawsuit over the alleged theft of intellectual property, decided to settle the case instead. (Michael Bryant/Staff)

by By Chris Brennan | Columnist

Published Jun. 20, 2014, 3:01 a.m. ET

DISTRICT ATTORNEY Seth Williams, due in federal court yesterday to defend himself in a lawsuit over the alleged theft of intellectual property, decided to

settle the case instead.

For a Twitter feud, this got pretty ugly.

Photographer **R. Bradley Maule**, of PhillySkyline.com, complained in the July 2013 lawsuit that a photo used as background for Williams' official Twitter account was pilfered from his website.

Williams, in a Dec. 30 deposition, said that Maule's attorney, **J. Conor Corcoran**, asked him about the photo during a 2013 primary Election Day lunch at the Famous 4th Street Deli.

Williams was not at all pleased with that chat and a follow-up phone call from Corcoran that he called an attempt to "shake me down over some silly picture."

See, Williams saw himself as the victim in this "photo caper."

"Unfortunately, there's a lot of human nature that there are people who prey on elected officials, people that they think are trying to do good," Williams explained in the deposition.

Instead, Williams went on, Maule could probably benefit from telling people the district attorney was using his picture.

Another deposition that day made clear an employee at the D.A.'s office installed Maule's picture on Williams' Twitter account after finding it with a Google search for "Philadelphia skyline."

The employee said she worked on the Twitter account during her lunch break, not while being paid by the District Attorney's Office.

Corcoran later emailed **Anthony Twardowski**, Williams' lawyer, and suggested the use of a city employee "for his own personal political pursuits" on Twitter

000258

might be a legal problem.

Twardowski, in an emailed response, called that "baseless and extortionate threats" in an "effort to strong-arm a settlement."

Twardowski also said Williams had reported Corcoran's "groundless threats" to the state Attorney General's Office and the U.S. Attorney's Office and was considering reporting him to the judge overseeing the lawsuit.

Twardowski declined to comment about that exchange and yesterday added this: "All I can say is the case has been settled."

Corcoran went further, throwing one more sharp elbow at Williams, who is known to name-drop his prosecution of a Catholic Church child sex-abuse case.

"When faced with the intellectual property claims of R. Bradley Maule, the District Attorney folded like the morals of the Catholic Church," Corcoran said.

32nd Ward fight rages on

Former Municipal Judge **Jimmie Moore** says he will sue the Democratic City Committee for overturning what he calls his election last week as leader of North Philly's 32nd Ward.

His lawyer, **Larry Otter**, says the lawsuit may be filed as soon as today in federal court.

Moore challenged ward leader **Gary Williams'** bid for a third term. They agree that the first vote ended in a 20-20 tie.

Williams and Moore agree that Moore narrowly won a second vote during the ward meeting.

Tie votes are supposed to go directly to the Democratic City Committee's Contest Committee. The full Democratic City Committee voted Monday that Williams would have prevailed 21-20 because a committeewoman wanted to change her vote.

Moore, who ran against U.S. Rep. Bob Brady in 2012 but dropped out of the race before the Democratic primary election, said he sees himself as the rightfully elected ward leader.

"I'm going to have a ward meeting Monday," Moore said. "I'm going to continue on with ward business."

Williams is not impressed.

"Jimmie Moore can do whatever the hell Jimmie Moore wants to do," he said. "I'm the ward leader. That's the bottom line."

Brady, chairman of the Democratic City Committee, said the quadrennial election of ward leaders was mostly peaceful.

"This was easy," Brady said. "We only had two or three fights. Usually we have more."

Quotable vs. Quotable:

"To Mr. Wolf, you should know that Philadelphia is not alone in our outrage over Gov. Corbett's cuts to public education. To Mr. Wolf, we say the commonwealth deserves more. Our schools deserve more." - City Councilwoman **Blondell Reynolds Brown**, speaking yesterday about **Tom Wolf**, the Democratic nominee for governor and **Gov. Corbett** while introducing legislation to borrow \$30 million to help fund the Philadelphia School District.

"It's unfortunate that Majority Whip Reynolds Brown would join Secretary Tom Wolf in perpetuating lies about Gov. Corbett's commitment to education." - **Chris Pack**, communications director for Corbett's campaign, referring to Wolf's former title as state revenue secretary under then-Gov. **Ed Rendell**.

Email: brennac@phillynews.com

Phone: 215-854-5973

" @ChrisBrennanDN

Blog: ph.ly/phillyclout



By Chris Brennan

TRENDING IN PHILLY

I-95 closing again in Center City Philadelphia. Here's what to know.

The Super Bowl's ending was great, but Tony Romo didn't stick the landing

This Pa. activist is the source of false and flawed election claims gaining traction across the country

Rare Pappy Van Winkle and Buffalo Trace bourbon and rye up for grabs in PLCB lottery

The three emptiest office buildings in Philadelphia

EDUCATION

EXHIBIT L

Area: SMALL BUSINESS/SELF EMPLOYED AREA #2
 Lien Unit Phone: (800) 829-3903
 Serial Number: 404641520

For Optional Use by Recording Office



As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

Name of Taxpayer J CONOR CORCORAN

Residence 2601 PENNSYLVANIA AVE APT 501
 PHILADELPHIA, PA 19130-2327

IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2008	XXX-XX-8997	06/22/2009	07/22/2029	
1040	12/31/2008	XXX-XX-8997	04/11/2011	05/11/2021	11847.57
1040	12/31/2009	XXX-XX-8997	05/31/2010	06/30/2020	
1040	12/31/2009	XXX-XX-8997	04/11/2011	05/11/2021	17772.04
1040	12/31/2010	XXX-XX-8997	05/30/2011	06/29/2021	14246.26
1040	12/31/2011	XXX-XX-8997	11/12/2012	12/12/2022	28239.22
1040	12/31/2012	XXX-XX-8997	11/18/2013	12/18/2023	204956.47
1040	12/31/2013	XXX-XX-8997	11/24/2014	12/24/2024	17843.50
1040	12/31/2016	XXX-XX-8997	10/30/2017	11/29/2027	1187.14
1040	12/31/2017	XXX-XX-8997	10/22/2018	11/21/2028	6146.52
1040	12/31/2018	XXX-XX-8997	10/28/2019	11/27/2029	1833.25

OFFICE OF FEDERAL RECORDS
 FIRST JUDICIAL DISTRICT OF PA
 JAN 11 2020
 AM 11:17

Place of Filing Prothonotary
 Philadelphia County
 Philadelphia, PA 19107
 Total \$ 113071.97

This notice was prepared and signed at DETROIT, MI, on this,
 the 24th day of January, 2020.

Signature *Shirley Dean Conroy*
 for S. MCGUIGAN
 Title ACS SBSE
 (800) 829-3903
 22-00-0001

EXHIBIT M



Find companies

J. Conor Corcoran

Philadelphia, PA

jccsq.com

Revenue: \$861,000

Employees: 5

[Claim this company](#)



Last Updated
02/02/2024



Industry
Law Firm



Location
Philadelphia, PA



You can add this company to your [prospects](#) to get updates

Competitors



Law Offices of Ronald J Resmini
Founded in 1970



Clifford Law Off



Summary

Edit



J. Conor Corcoran

Description

000260

The Law Office of J. Conor Corcoran is a civil litigation firm based in Philadelphia, with associates from coast to coast, and with particular interests in the fields of Catastrophic Injury, Copyright Infringement, Medical Malpractice, Civil Rights, an...

Strengths

Revenue generated per employee is greater than industry average

Weaknesses

J. Conor Corcoran has a very small market share in their industry

Revenue growth is less than the industry average

The number of employees is not growing as fast as the industry average

Variance of revenue growth is more than the industry average

Annual Revenue

Edit

J. Conor Corcoran's annual revenue

\$861,000

Based on Kona Equity data

Revenue per employee

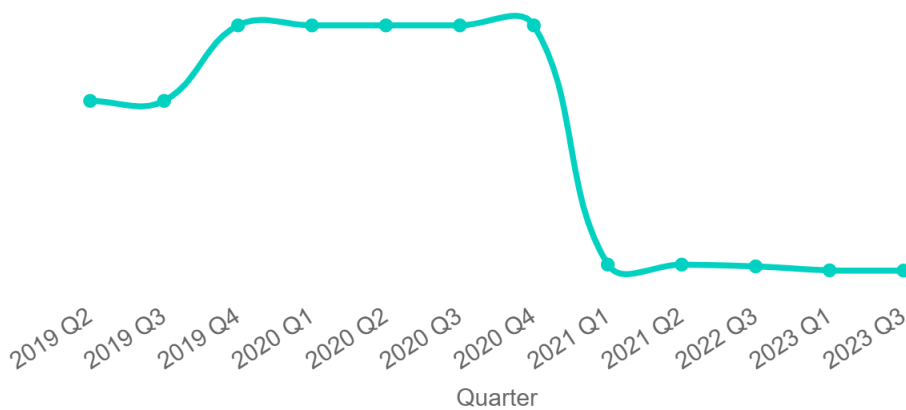
\$172,200

Variance of revenue growth

0.63

Revenue growth rate from first known quarter to current

-72.1%

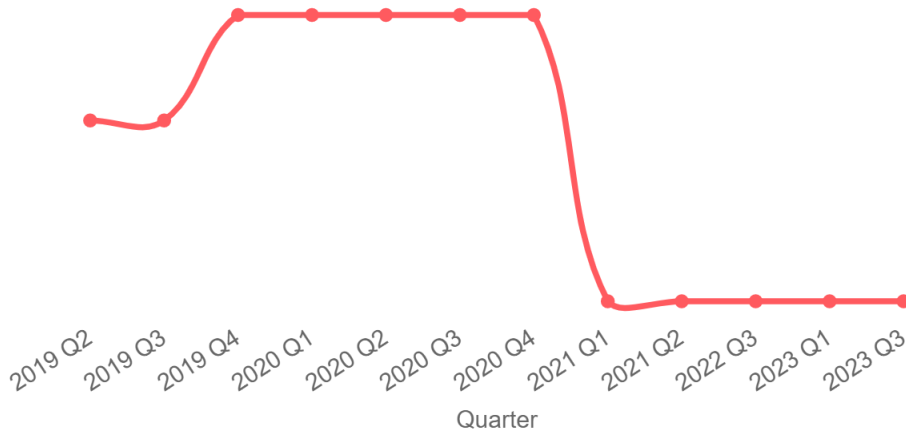


Employee Count

Edit

5 employees

Employee growth rate from first known quarter to current
-70.6%



Executives

Edit

Conor Corcoran

Attorney

c**@jccesq.com

Unlock Email

Gia Ceritano

Paralegal

g**@jccesq.com

Unlock Email

Amy Harting

Law Clerk

a**@jccesq.com

Unlock Email

G Score - 1

G2 Income per employee more than industry average.

Location

Edit

1500 John F. Kennedy Blvd, Ste 620
Philadelphia, PA 19102

Unlock unlimited leads

Get access to millions of contacts, companies, emails, and more!

Continue to Kona Equity Premium

Key Information

Edit

Name: J. Conor Corcoran

Industry: Law Firm



#Law Firms & Legal Services

SIC: 8111; 811

NAICS: 541; 5411

Disclaimer: These numbers are estimates and any other company information is based off our proprietary algorithms and by no means should be accepted as 100% factual. Kona Equity is in no way affiliated with J. Conor Corcoran.

See similar companies

000205

By City

Philadelphia

Small Law Firm in Philadelphia

Mid-size Law Firm in Philadelphia

By State

PA

Small companies in PA

Small Law Firm in PA

Mid-size Law Firm in PA

By Industry

Law Firm

Small Law Firm

Mid-size Law Firm

Firmographic data

G Score of 1

SIC: 8111

SIC: 811

NAICS: 541

NAICS: 5411

#Law Firms & Legal Services

Frequently Asked Questions

Where is J. Conor Corcoran located?

v

What is J. Conor Corcoran's official website?

v

What is J. Conor Corcoran's revenue?

v

What is J. Conor Corcoran's SIC code?

v

Gregory Stenstrom, Pro Se 1541 Farmers Lane Glen Mills, PA 19342 856-264-5495 gregorystenstrom@gmail.com gstenstrom@xmail.net	Leah Hoopes, Pro Se 241 Sulky Way Chadds Ford, PA 19317 610-608-3548 leahfreedelcopa@protonmail.com
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**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
PENNSYLVANIA (CIVIL DIVISION)**

JAMES SAVAGE

CASE ID NO.: 211002495

Plaintiff,

**PRAECIPE TO ATTACH
MOTION FOR SANCTIONS**

v.

DONALD J. TRUMP, et al,

Defendants

PRAECIPE TO ATTACH MOTION FOR SANCTIONS

1. Pro Se Defendants Leah Hoopes and Gregory Stenstrom hereby attach the information herein to its Motion for Sanctions filed February 14th, 2024 (Control No. 54-24023354). In support of this motion. Hoopes and Stenstrom avers as follows:
2. Plaintiff’s attorney J. Conor Corcoran averred during Discovery hearing before the Honorable Court on January 10th, 2024, that he did not have responsive Plaintiff medical records, had been unable to obtain them, and that Pro Se Defendants Stenstrom and Hoopes would have to subpoena them from Plaintiff’s (undisclosed) healthcare provider.
3. Honorable Judge Erdos ordered Plaintiff’s attorney Corcoran to produce them.
4. Plaintiff’s attorney Corcoran provided partial responsive documents via email at 4:35pm, yesterday, February 15th, 2024, with Plaintiff medical records.
5. A common theme of Plaintiff’s attorney Corcoran’s conduct described in subject motion is his inability to remember the stream of falsehoods he is accustomed to crafting from one moment to the next, even during the short periods of hearings, and his inattention to detail.

- The fax cover sheet of the documents from CCP Crozer shows he has been in possession of documents he swore he did not have during the January 10th, 2024, with a transmission date of November 29th, 2023, which was forty-two (42) days previous to the hearing; eighty(80) days until he produced them to Pro Se Defendants (yesterday); and only ten (10) days prior to the February 25th, 2024, discovery deadline Ordered by the Honorable Court, leaving Defendants at disadvantage as to relevant subpoenas that they might need to file to meet their own evidence production deadlines, and prepare for their defense.


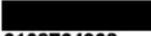
<p>Fax PLAINTIFF0001</p> <p>To: Fax Number: Company: Voice Number: Address 1: Address 2: Address 3:</p> <p>From: Fax Number: Company: Voice Number: Address 1: Address 2: Address 3:</p> <p>Date: Subject:</p>	<p> Cardiology Consultants of Philadelphia, P.C. PLAINTIFF0001</p> <p>Law Office of J. Conor Corcoran, 1-215-735-1175 Law Office of J. Conor Corcoran,</p> <p> 6108764308 CCP Crozer 6108762400 One Medical Center Boulevard Upland, PA 19013</p> <p>November 29, 2023</p>
---	---

Figure 1 - Medical Records Fax Cover Sheet.

- The medical records, which will be submitted as confidential documents to the Honorable Court, and docket, under separate cover, show that Plaintiff Savage did NOT have “two heart attacks” as attested to by Plaintiff’s attorney Corcoran, but rather suffers pre-existing cardiac deficiencies related to smoking and obesity among other self-inflicted maladies.
- Hence, the apparent reluctance by Plaintiff and Plaintiff’s counsel to produce them as material facts in support of the complaint they both separately verified by their individual signatures, and Plaintiff’s attorney Corcoran’s repeated oral testimony in hearings before the Honorable Court.

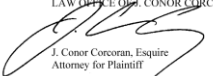
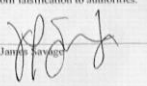
<p style="text-align: center;"><u>VERIFICATION</u></p> <p>I, J. Conor Corcoran, hereby verify that I am the attorney for the Plaintiff; that I have read the averments in the foregoing document, and they are true and correct to the best of my knowledge, information, and belief; and that I make this Verification subject to 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.</p> <p style="text-align: center;">Respectfully Submitted,</p> <p style="text-align: center;">LAW OFFICE OF J. CONOR CORCORAN, P.C.</p> <p style="text-align: center;"> J. Conor Corcoran, Esquire Attorney for Plaintiff</p> <p>Date: November 1, 2021</p>	<p style="text-align: center;"><u>VERIFICATION</u></p> <p>I, James Savage, hereby verify that I am the Plaintiff; that I have read the foregoing, and it is true and correct to the best of my knowledge, information and belief; and that I make this Verification subject to 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.</p> <p style="text-align: center;"> James Savage</p>
---	--

Figure 2 – Plaintiff and Plaintiff’s attorney Verifications.

9. Nor has Plaintiff or Plaintiff's attorney produced any evidence from their proposed expert witness of any examination to support their claims that would permit Pro Se Defendants Stenstrom and Hoopes to prepare their defense.
10. Plaintiff and Plaintiff's attorney Corcoran continues to show little interest in providing any material facts to support their claims, and instead rely on conjectural, baseless statements with apparent attempt to repeat attorney Corcoran's modus operandi described in the subject Motion for Sanctions of bullying a settlement from defendants by toying with Case Management Order deadlines, exhausting defendants financially, and dragging proceedings out, which in this case is now 838 days since Plaintiff's instant complaint.
11. Plaintiff's attorney Corcoran appears to have been spurred to finally produce the medical records that have been requested by all Defendants since the inception of Plaintiff November 1st, 2021, complaint, by Pro Se Defendants Stenstrom and Hoopes subject Motion for Sanctions, which included reference to both the *Brown v Broke Flats* "slip and fall" case filed by attorney Corcoran, and Pro Se Defendants statement that:
 - a. *"When Pro Se Defendants Stenstrom and Hoopes pressed for medical records documenting Plaintiffs alleged "two heart attacks," after the more than 800+ days that this subject case has been permitted to drag on, and three blown Discovery deadlines, Corcoran stated he did not have any, and that he had been unable to obtain them from Plaintiff Savage, and that Pro Se Defendants Stenstrom and Hoopes would have to subpoena them."*
12. Wherefore, Pro Se Plaintiffs Stenstrom and Hoopes request that this Praecepto to Attach and proposed Order be attached to their Motion for Sanctions.

Respectfully submitted,



LEAH HOOPES

241 Sulky Way
Chadds Ford, PA 19317
Telephone: 610-608-3548
leahfreedelcopa@protonmail.com
16FEB2023



GREGORY STENSTROM
1541 Farmers Lane
Glen Mills, PA, 19342
Telephone: 856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com
16FEB2023

VERIFICATION

We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Motion for Sanctions are true and correct to the best of our knowledge, information, and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



GREGORY STENSTROM
PRO SE



LEAH M. HOOPES
PRO SE

Dated: 16FEB2023

Pro Se Defendants Gregory Stenstrom and Leah Hoopes

Gregory Stenstrom, Pro Se
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495
gstenstrom@xmail.net
gregorystenstrom@gmail.com

Leah Hoopes, Pro Se
241 Sulky Way
Chadds Ford, PA 19317
610-608-3548
leahfreedelcopa@protonmail.com

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE
Plaintiff,

v.

DONALD J. TRUMP,

et al,
Defendants

CASE ID NO.: 211002495

**PRAECIPE TO ATTACH
MOTION FOR SANCTIONS**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, they caused the foregoing Motion for Sanctions, to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Gregory Stenstrom and Leah Hoopes

Dated: 16FEB2023

**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY PENNSYLVANIA
(CIVIL DIVISION)**

JAMES SAVAGE

CASE ID NO.: 211002495

Plaintiff,

v.

DONALD J. TRUMP, et al,

Défendants.

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Defendant’s Motion for Sanctions, and any response thereto, it is hereby ORDERED and DECREED that said Motion is GRANTED.

Pro Se Defendants Stenstrom and Hoopes shall be paid fifty-thousand US dollars (\$50,000) _____ by Plaintiff Savage, and fifty-thousand US dollars (\$50,000) _____ by Plaintiff’s attorney J. Conor Corcoran, for a total of \$100,000 to each Pro Se Plaintiff, and total sanctions in the amount of \$200,000 _____.

BY THE COURT

EXHIBIT D



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

SAVAGE VS TRUMP ETAL

October Term, 21

No. 02495

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Delaware County Solicitor William Martin
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Schedule A

at: 241 Sulky Way Chadds Ford PA 19317
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: September 11, 2023

Name: Leah Hoopes, Pro Se

Address:

241 Sulky Way
Chadds Ford, PA 19317

Telephone: 610 608-3548

Supreme Court ID#: Pro Se

Attorney for: Defendant



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-6652 or Email: OJRCivil@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

SAVAGE VS TRUMP ETAL

: Court of Common Pleas
:
:
: _____ October _____ Term, _____ 21
:
: No. _____ 02495 _____

TO: Delaware County Solicitor William Martin
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

Schedule A

From January 1, 2020 to December 31, 2021.

- Please provide chain of custody sheets for USB drives/removable media from all Hart machines used in the 2020 general election
- Please provide all communication, reports, investigations performed on the missing and unrecoverable USB/Flash/V drives from the 2020 general election
- All login in sheets, information for tabulation servers, and election management system for the 2020 general election
- Any and all communication during the employment of James Savage, to and from James Allen, Demar Moon, Hart Intercivic, Christine Reuter, Regina Miller, Gerald Lawrence, Department of State, Attorney General, FBI, Delaware County District Attorney's office, and Park Police
- Please provide Logic and Accuracy testing records including attestation report provided to the Department of State for 2020 and 2021
- Please provide all login credentials provided to and used during the 2020 general election James Savage
- Please provide and any all communication from Delaware County council , election board to , Director of elections Marianne Jackson, Director of Delaware County Howard Lazarus to and from FBI , PA state Police, Park Police, Delaware County District Attorney's office in regard to the hacking of the servers during November 2020
- Please provide all serial numbers for all Hart Intercivic machines used to scan, tabulate the November 2020 general election also include all correlating documentation linked to these machines including return sheets, proof sheets, USB drives, USB drives used in Logic and Accuracy testing, Cast vote records, verity keys,.verity cast drives
- All chain of custody sheets from all drop boxes used in the November 2020 general election
- All logs from rover vans used to transport election materials and machinery used in the 2020 general election
- All images and USB drives from the Bluecrest sorter used in the 2020 general election
- Please provide any and all lists, reports, information of all volunteers and employees that participated in the 2020 general election
- Chain of custody documentation from all drop off locations used in the 2020 election
- Please provide all images of ballots tabulated in the 2020 general election
- Please provide original v drive duplicators, verity keys, logs from the election management system include all subsequent reports, logs used in the 2020 general election
- Please provide all postage meter documentation used in the administration of the 2020 general election
- Please provide all security footage from the buildings including the central counting center at Seaport drive, Board of Elections, Government center, drop boxes during the time frame of September 2020 to November 2020
- All reports from the Delaware County Park police in regards to threats made against James Savage during his employment as Voting machine warehouse supervisor
- Please provide all medical leave documentation , including unemployment, or human resource documentation describing James Savages medical condition , and limitations during duty as an public official as the Supervisor of the Voting machine warehouse
- Please provide offer letter for James Savage as the Supervisor of the voting machine warehouse
- Please provide all documentation created , edited, logged , by James Savage during his employment in Delaware County Pennsylvania
- Please provide oath of office for James Savage
- Please provide all documentation from the Voting machine warehouse , including time sheets , log in documentation , equipment logs, service logs, for James Savage and Demar Moon
- All logged phones calls to the Delaware County voting machine warehouse located in Chester Pa, during James Savage's employment during the administration of the 2020 election



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

SAVAGE VS TRUMP ETAL

: Court of Common Pleas
:
: _____ October Term, 21
:
: No. 02495

TO: Delaware County Solicitor William Martin
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, William Martin
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on SEPTEMBER 11th have been produced.
(Date of Subpoena)

No documents or things responsive to this subpoena are in my possession.

Date: 10/2/2023

/s/ William Martin
(Signature of Person Served with Subpoena)

Ballard Spahr LLP

1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
TEL 215.665.8500
FAX 215.864.8999
www.ballardspahr.com

Elizabeth Wingfield
Tel: 215.864.8128
Fax: 215.864.8999
wingfielde@ballardspahr.com

October 2, 2023

By Hand Delivery and U.S. Mail

Leah Hoopes
241 Sulky Way
Chadds Ford, PA 19317

Re: Subpoena to Produce Documents or Things Served Upon William Martin

Dear Ms. Hoopes:

Pursuant to the subpoena you served upon William Martin in *Savage v. Trump*, No. 02495, enclosed please find Mr. Martin's Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23.

Sincerely,

/s/ Elizabeth V. Wingfield
Elizabeth V. Wingfield
Enclosure

EXHIBIT E



pennsylvania
OFFICE OF OPEN RECORDS

FINAL DETERMINATION

IN THE MATTER OF	:
	:
LEAH HOOPEES,	:
Requester	:
	:
v.	: Docket No: AP 2024-0241
	:
DELAWARE COUNTY,	:
Respondent	:

FACTUAL BACKGROUND

On December 4, 2023, Leah Hoopes (“Requester”) submitted a request (“Request”) to Delaware County (“County”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.*, stating:

I am requesting any and all documentation, texts, emails, communications, faxes, phone calls that took place among J Manly Parks, Nick Centrella,¹ Adrienne Marofsky, William Martin² with factcheck.org and any other 3rd party, news media or publication during the months of November - December 2020 and January 2021.

This is a third party in which public officials and their attorneys are talking with and no privilege applies.

On January 9, 2024, following a thirty-day extension during which to respond, 65 P.S. § 67.902(b), the County denied the Request arguing that it does not possess records responsive to the Request.

¹ J. Manly Parks and Nick Centrella are employees of the law firm, Duane Morris, who provided legal services for the County during the relevant timeframe.
² Adrienne Marofsky and William Martin are employees of Delaware County for the relevant timeframe.

On January 22, 2024, the Requester appealed to the Office of Open Records (“OOR”), challenging the denial and stating grounds for disclosure. In her appeal filing, the Requester specifically argues that responsive records exist as evidenced by the Duane Morris attorney invoices submitted to the County Board of Elections solicitor states that Attorney J. Manly Parks billed the County for time spent on December 7, 2020 “[Correspondence regarding] facts [regarding] uploading of VCards for Factcheck.org[.]” The OOR invited both parties to supplement the record and directed the County to notify any third parties of their ability to participate in this appeal. 65 P.S. § 67.1101(c).

On January 30, 2024, the County submitted a position statement arguing that it conducted a good faith search for responsive records and that no responsive records exist in its possession, custody, or control. In support of its position, the County submitted the affidavit of Jonathan Lichtenstein, Esq., the Solicitor for the County (“Lichtenstein Affidavit”) who states that the County IT Department conducted a search of emails of the named County employees and that no responsive emails were discovered. The Lichtenstein Affidavit further states that the Request was forwarded to J. Manly Parks who had the IT Department of Duane Morris conduct a search for responsive emails and that no responsive emails were returned. On February 6, 2024, the Requester provided an additional submission in support of the argument that the County should possess responsive records given the line items on the solicitor invoices and public statements made by the County.

LEGAL ANALYSIS

The County is a local agency subject to the RTKL. 65 P.S. § 67.302. Records in the possession of a local agency are presumed to be public, unless exempt under the RTKL or other law or protected by a privilege, judicial order or decree. *See* 65 P.S. § 67.305. As an agency

subject to the RTKL, the County is required to demonstrate, “by a preponderance of the evidence,” that records are exempt from public access or do not exist. 65 P.S. § 67.708(a)(1). Preponderance of the evidence has been defined as “such proof as leads the fact-finder ... to find that the existence of a contested fact is more probable than its nonexistence.” *Pa. State Troopers Ass’n v. Scolforo*, 18 A.3d 435, 439 (Pa. Commw. Ct. 2011) (quoting *Pa. Dep’t of Transp. v. Agric. Lands Condemnation Approval Bd.*, 5 A.3d 821, 827 (Pa. Commw. Ct. 2010)).

1. The County failed to interpret the Request reasonably and demonstrate that it conducted a good faith search for responsive records

An agency may interpret the meaning of a request for records, but that interpretation must be reasonable. *See Bradley v. Lehighon Area Sch. Dist.*, OOR Dkt. AP 2021-0333, 2021 PA O.O.R.D. LEXIS 715; *Ramaswamy v. Lwr. Merion Sch. Dist.*, OOR Dkt. AP 2019-1089, 2020 PA O.O.R.D. LEXIS 2095. The OOR must determine whether or not the agency’s actual interpretation of a request is reasonable. *Ramaswamy*, 2020 PA O.O.R.D. LEXIS 2095; *Winegrad*, 2023 PA O.O.R.D. LEXIS 483. The OOR determines this from the text and context of the request alone, as neither the OOR nor the requester is permitted to alter a request on appeal. *See McKelvey v. Off. of the Att’y Gen.*, 172 A.3d 122, 127 (Pa. Commw. Ct. 2016); *Smith Butz, LLC v. Dep’t of Env’tl. Prot.*, 142 A.3d 941, 945 (Pa. Commw. Ct. 2016). Emails and text messages of a public official which are contained on personal devices may be public records if the emails or texts were created, received, or retained in connection with a transaction, business, or activity of the agency and the public official was acting in their capacity on behalf of the agency. *See Mollick v. Twp. of Worcester*, 32 A.3d 859, 875 (Pa. Commw. Ct. 2011); *see also, Barkeyville Borough v. Stearns*, 35 A.3d 91, 95-97 (Pa. Commw. Ct. 2012) (citing *Mollick*, 32 A.3d at 872-73); *Easton Area Sch. Dist. v. Baxter*, 35 A.3d 1259 (Pa. Commw. Ct. 2012).

The County states that IT searched for responsive emails “among all of the named parties”

which appears to indicate that a search was not conducted for responsive emails where less than the four named individuals are included. Thus, it appears that the County interpreted the Request as seeking emails only between all of the named parties instead of emails which are inclusive of any or all of the named parties. The word “among” has many differing uses, some of which indicate a joint or common action more akin to the word between, and some of which indicate intermingling.³ Because the Request is subject to two different, but reasonable interpretations, we find that the County’s interpretation that was used to respond to the Request was reasonable in this instance. *See Long v. Bath Borough*, OOR Dkt. AP 2023-1598R, 2024 PA O.O.R.D. LEXIS ____ (when ruling on a Petition for Reconsideration relating to interpretation of request for emails “between” named individuals, the OOR noted that where a request is subject to two different, but reasonable interpretations, the OOR will not overturn an agency’s interpretation). Nothing precludes the Requester from submitting a new RTKL request with language that seeks a larger universe of records, if she chooses to do so.

Notwithstanding, the Request seeks “any and all documentation, texts, emails, communications, faxes, phone calls that took place among” four named individuals with factcheck.org and any other third party, news media, or publication during the months of November 2020, December 2020, and January 2021. Through the Lichtenstein Attestation, the County demonstrated that the County IT Department conducted a search of the County email servers for responsive emails which may have been sent via the County email addresses of the employees. *See Lichtenstein Attestation* ¶ 3. Specifically, the search conducted was for “emails among all the named parties.” *Id.* The County further attests that the named Duane Morris attorneys

³ BLACK’S LAW DICTIONARY defines among as “Mingled with or in the same group or class. Intermingled with. In company or association with. In shares to each of, e.g. divided ‘among’ the heirs. In or through the midst of.” BLACK’S LAW DICTIONARY 83 (6th ed.).

had their work email addresses search by the firm's IT Department and that no responsive emails were returned. *Id.* at ¶ 4. The County's evidence is devoid of detail explaining the parameters of the email search conducted which would demonstrate that the County and third-party contractors conducted a search reasonably calculated to uncover all responsive records, specifically the text messages, records of phone calls, faxes, emails, and other documentation of communications sought in the Request. Accordingly, the County's interpretation of the Request as seeking emails only on the County or law firm servers ignores the plain meaning of the words used in the Request and is unreasonable.

CONCLUSION

For the foregoing reasons, the appeal is **granted in part** and **denied in part**, and the County is required to conduct a good faith search for all records responsive to the Request and provide all responsive records within thirty days. If no additional responsive records are located following a good faith search, the County shall provide the Requester with a sworn affidavit or statement made under the penalty of perjury describing its search and confirming that no additional records exist. This Final Determination is binding on all parties. Within thirty days of the mailing date of this Final Determination, any party may appeal to the Delaware County Court of Common Pleas. 65 P.S. § 67.1302(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond according to court rules as per 65 P.S. § 67.1303, but as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.⁴ All documents or communications following the issuance of this Final Determination shall be sent to oor-postfd@pa.gov. This Final Determination shall be placed on the OOR website at: <http://openrecords.pa.gov>.

⁴ *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).

FINAL DETERMINATION ISSUED AND MAILED: February 21, 2024

/s/ Catherine R. Hecker

APPEALS OFFICER
CATHERINE R. HECKER

Sent via OOR Portal to: Leah Hoopes
Anne Coogan
Robert Scott, Esq.

EXHIBIT F

The Law Office of John F. Rooney, V., PLLC

John F. Rooney, V, Esq. (ID# 310289)
2401 Pennsylvania Avenue, Suite 1C41
Philadelphia, PA 19130
P: (215) 279-8400
F: (267) 775-5330
Email: john@rooneyphillylawyer.com

JAMES ALLEN & JAMES SAVAGE	:	DELAWARE COUNTY
	:	COURT OF COMMON PLEAS
	:	
Plaintiffs,	:	CV-2022-008511
v.	:	
	:	
NEWSMAX MEDIA INC., et. al.	:	
	:	
Defendants.	:	

ENTRY / WITHDRAW OF APPEARANCE

To The Prothonotary of Said Court:

Kindly enter the appearance of John F. Rooney, V, Esq. on behalf of Plaintiff, James Allen, regarding the above referenced matter.

/s/John F. Rooney
John F. Rooney, V.
ID# 310289

Kindly withdraw the appearance of J. Conor Corcoran, Esq. on behalf of Plaintiff, James Allen, regarding the above referenced matter.

/s/J. Conor Corcoran
J. Conor Corcoran
ID# 89111

BY THE COURT:

J.