DILWORTH PAXSON LLP

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tmutchler@dilworthlaw.com strentalange@dilworthlaw.com Counsel for Petitioners

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY21-00277

HURUBIE MEKO and LNP MEDIA GROUP, INC.,	:	
	:	Case No.
Petitioners,	:	
	:	
V.	:	
	:	
CITY OF LANCASTER,	:	
	:	
Respondent.	:	•

VERIFIED PETITION FOR REVIEW

This Verified Petition for Review is made under Act 22 of 2017, which permits any member of the public to request video or audio recordings created by law enforcement agencies and allows a right of appeal to a Court of Common Pleas with jurisdiction in the event of denial of access. See 42 Pa.C.S.A. §§ 67A01, et seq. In support of this appeal, Petitioners state as follows:

PARTIES

1. Petitioner, LNP Media Group, Inc. ("LNP"), is a print and digital news organization and publisher of LNP, a newspaper of general circulation covering Lancaster County and located at 101 N. Queen St., Lancaster, PA 17603. LNP also supports a digital news presence known as LancasterOnline.

66252587 178.25 RCT#130913

- 2. Petitioner, Hurubie Meko ("Meko"), is a LNP investigative reporter in the file of the request for video recordings, specifically police body camera footage, pursuant to Act 22 of 2017 ("Act 22"), codified at 42 Pa.C.S.A. §§ 67A01, et seq.
- 3. Respondent, the City of Lancaster, is the entity that denied Petitioner Meko's request for the audio recording or video recording. See 42 Pa.C.S.A. § 67A06(a)(2) ("The respondent to a petition filed under this section shall be the entity that denied the request for the CI-21-00277 audio recording or video recording under section 67A05(a) (relating to procedure)").

JURISDICTION

4. Respondent is located within Lancaster County and therefore this Court has jurisdiction over this matter. *See Bradley v. O'Donoghue*, 823 A.2d 1038, 1040 (Pa. Commw. Ct. 2003) (citing Section 333 of the JARA Continuation Act of October 5, 1980, P.L. 693, 42 Pa. C.S. § 20043); *see also* 42 Pa.C.S.A. § 67A06(a)(1) (providing a right of appeal to a court of common pleas with jurisdiction within 30 days of the request's denial).

STATEMENT OF FACTS

- 5. In the summer of 2020, protests erupted across the nation in response to the unlawful killing of George Floyd on May 25, 2020.¹
- 6. These protests primarily focused on police reform and accountability, with thousands of American citizens participating in marches and demonstrations across the country.
- 7. On September 13, 2020, the Lancaster City Bureau of Police ("LCBP") responded to an incident involving a mentally ill young man, Ricardo Munoz. Police body camera footage

¹ See Derrick Bryson Taylor, George Floyd Protests: A Timeline, The New York Times (Jan. 6, 2021), available at https://www.nytimes.com/article/george-floyd-protests-timeline.html.

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showed Mr. Munoz charging an officer with a knife; Mr. Munoz was subsequently short and killed by the responding officer.²

- 8. That evening, a large crowd of protesters gathered outside of LCBP headquarters in Lancaster City and demonstrated throughout the evening into the morning.
- 9. Observing news agencies, as well as private citizens, recorded video and took still photos of the events, all of which took place on public streets and sidewalks.³

Other LNP | LancasterOnline correspondents were at the scene of the protest, 10. taking videos and photos and live-tweeting the events as they unfolded in the public streets.



My phone battery is low but about 10 minutes ago police started to fire tear gas and advance on the protestors after they were banging on a metal structure for several minutes. Protesters responded by throwing water bottles and returning the tear gas. Ongoing, will update

12:41 AM - Sep 14, 2020 - Twitter for IPhone

5 Retyreets 10 Likes

Multiple times in the evening, police and the protesters clashed, resulting in tear 11. gas, foam rounds and/or rubber bullets, and other crowd control measures being deployed by LCBP and the Lancaster County Special Emergency Response Team.

² See Dan Nephin, Ricardo Muñoz's Last Day: A Family's Efforts to Get Mental Health Help Leads to Fatal Shooting, LNP | LancasterOnline (Oct. 5, 2020), available at: https://lancasteronline.com/news/local/ricardomu-ozs-last-day-a-familys-efforts-to-get-mental-health-help-leads-to/article 317c048a-063a-11eb-86dab7de29b2af0b.html.

³ The scene outside LCBP headquarters on September 13, 2020 at approximately 10:20 pm was recorded by LNP | LancasterOnline and is available at: https://www.facebook.com/102506761394/videos/657189651569713 (last accessed Jan. 13, 2021).



Police using teargas



12:30 AW - Sep 14, 2020 - Twitter for Phone

121 Retweets 23 Quote Tweets 337 Likes

12. In addition, multiple protesters were arrested for arson and looting related activities that were witnessed by police officers, according to public charging documents.



Police made several arrests moments ago. The streets are pretty much clear at this point. I asked if I could go in to take pictures and they said no and that they were arresting anyone who is still out.

3:08 AM - Sep 14, 2020 - Twitter for IPhone

65 Retweets 5 Quote Tweets 283 Likes

13. On November 9, 2020, Petitioner Meko filed an Act 22 request for body camera footage from the evening of September 13, 2020, with LCBP's open records officer. See Exhibit A; see also 42 Pa.C.S.A. § 67A03(1).

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Pursuant to 42 Pa.C.S.A § 67A03(1), the request was personally delivered to the LCBP's open records officer and made within 60 days of the date the video recording was created.

- 15. The request stated with particularity the incident or event that is the subject of the audio recording or video recording, including the date, time and location of the incident or event (see 42 Pa.C.S.A. § 67A03(2)), and included a statement describing the requester's relationship CI-21-00277 to the incident or event that is the subject of the audio or video recording (see 42 Pa.C.S.A. § 67A03(3)).
- 16. On December 14, 2020, Respondent denied Petitioner Meko's request, arguing as follows:

The video you have requested contains numerous incidents of unrest that are part and parcel of riot and other criminal charges currently pending before the Court of Common Pleas. Given the length of the acts alleged in those charges and the variety of acts involved, there is no reasonable method in which to redact the audio and video from the requested body camera footage so as to safeguard the investigative information and ensure a fair trial for both the defendants and the Commonwealth. Pursuant to Section 67A04(a) of Act 22 of 2017, your request is denied in that the City of Lancaster Bureau of Police in conjunction with the District Attorney's Office of the County of Lancaster has determined that the requested video contains potential evidence in a criminal matter, information pertaining to an investigation, or a matter in which criminal charges have been filed, confidential information or victim information and the reasonable redaction of the audio or video recording would not safeguard potential evidence. information pertaining to an investigation, confidential information or victim information.

See Exhibit B.

17. Respondent's denial was a boilerplate recitation of the provisions of Ricci M. Deni
§ 67A04, which provides that:

[I]f a law enforcement agency determines that an audio recording or video recording contains potential evidence in a criminal matter, information pertaining to an investigation or a matter in which a criminal charge has been filed, confidential information or victim information and the reasonable redaction of the audio or video recording would not safeguard potential evidence, information pertaining to an investigation, confidential information or victim information, the law enforcement agency shall deny the request [1-21-00277] writing. The written denial shall state that reasonable redaction of the audio recording or video recording will not safeguard potential evidence, information pertaining to an investigation, confidential information or victim information.

42 Pa.C.S.A § 67A04(a).

18. This appeal follows within the time limit proscribed by 42 Pa:C.S.A. § 67A06 (a)(1).

ARGUMENT

- 19. Petitioners incorporate all above paragraphs as if set forth herein.
- Act 22 provides a right of access by which the public can request and review body camera footage, as a means of creating accountability and public trust in law enforcement institutions. See generally 42 Pa.C.S.A. §§ 67A01, et seq.
- 21. Petitioners ask: If this body camera footage is exempt from access, what sort of footage, exactly, did the Pennsylvania legislature intend to grant access while drafting Act 22?
- 22. Pursuant to 42 Pa.C.S.A. § 67A06(e), this Court may grant this Petition and order the disclosure of the body camera footage if it determines that Petitioners have established the following by a preponderance of the evidence:
 - a. That Respondent's denial was arbitrary and capricious; and,

b. That the public interest in disclosure of the body camera for the public interest of the Petitioners, outweighs the interests of the law enforcement agency or an individual's interest in nondisclosure.

See 42 Pa.C.S. § 67A06(e).

23. "A preponderance of the evidence standard, the lowest evidentiary standard, is tantamount to 'a more likely than not' inquiry." Carey v. Dep't of Corr., 61 A.3d 367, 374 (Pa. CI-21-00277 Commw. Ct. 2013) (emphasis added).

Arbitrary and Capricious

- 24. It is more likely than not that Respondent's denial of access was arbitrary and capricious.
- 25. Petitioners' requested information cannot be considered exempt for investigative or evidentiary purposes, as the entire protest occurred in the public view.
- 26. As noted above, LNP | LancasterOnline and several other newsgathering organizations were on-site the entire time throughout the evening of September 13, 2020, filming and photographing the unfolding events in front of LCBP headquarters.
- 27. In addition, numerous citizens were recording the protest using their own cellphones and were posting still photos and videos to social media sites such as Facebook Live and other content streaming platforms. Beyond the media's and citizenry's scrutiny of the public scene, Lancaster City, moreover, utilizes a surveillance system that captures video from numerous locations throughout the City.⁴

⁴ See Lindsey Blest, Lancaster Safety Coalition Wants to Replace Its Fleet of Cameras With 360-Degree Ones, LNP | LancasterOnline (Jul. 10, 2019), available at https://lancasteronline.com/news/local/lancaster-safety-coalition-wants-to-replace-its-fleet-of-cameras-with-360-degree-ones/article_9c95f612-a282-l1e9-82f3-837e71197425.html.

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28. To be clear, these events did not take place within a private residence of the party of within any building. Instead, these events took place on an open street, subject to wide public observation.

- 29. To withhold footage of *public events*—where the only distinction is the perspective of a different lens, in this case, a body camera—is arbitrary and capricious.
- 30. Moreover, the capricious nature of Respondent's denial lies in the fact that LCBP

 CI-21-00277

 may be subjected to heightened public scrutiny upon the production of this body camera footage.
- 31. Notably, Act 22 is a fairly new law, and as such, there is very little decisional case law interpreting its provisions.
- 32. Even so, Act 22's purpose is clear: to provide greater transparency in law enforcement, not less.
- 33. In that connection, for this Court to hold that the events which unfolded on September 13, 2020, in a public street in front of LCBP headquarters—many of which have already been recorded and transmitted to the public by the media and citizenry—are not subject to public review, would certainly deprive Act 22 of any effective value.

Public Interest in Disclosure

- 34. It is more likely than not that the public interest in disclosure of the requested body camera footage, or the interest of the Petitioners, outweighs the interests of LCBP or an individual's interest in nondisclosure.
 - 35. In making its public interest disclosure determination, this Court may consider:
 - a. The public's interest in understanding how law enforcement officers interact with the public;

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- b. The interests of crime victims, law enforcement and others with respect the safety and privacy; and
- c. The resources available to review and disclose the audio recording or video recording.

42 Pa.C.S.A. § 67A06(e).

- 36. As the United States Supreme Court has observed, "[t]he free press has been a CI-21-00277 mighty catalyst in awakening public interest in governmental affairs, exposing corruption among public officers and employees and generally informing the citizenry of public events and occurrences" Estes v. Texas, 381 U.S. 532, 539, (1965).
- 37. There is indeed a "basic assumption [in] our political system that the press will often serve as an important restraint on government," as "[an] untrammeled press is a vital source of public information," and "an informed public is the essence of working democracy." Minneapolis Star & Tribune Co. v. Minn. Comm'r of Revenue, 460 U.S. 575, 585 (1983) (internal citations and quotations omitted) (alterations added).
- 38. There has always been a significant public interest in understanding how law enforcement interacts with the public in the United States.
- 39. However, given the current public concern regarding police reform and accountability—as well as the countering opinions that have emerged in our national discussion of effective policing methods—there is an even stronger public interest in viewing these protests from the perspective of the responding law enforcement officers.
- 40. Here, Respondent utterly failed to identify any victim whose safety or privacy would be violated by disclosure of the requested body camera footage. To be sure, the events in questions were not attacks on an individual, they were public demonstrations. The only pending

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criminal charged mentioned in Respondent's denial was "riot," which is a victimle Ricci M. Defil

Exhibit B.

41. Moreover, the names of the law enforcement officers were openly displayed on badges as they actively responded to the public protests. Thus there can be no legitimate concern as to the identification of specific officers, as those identifies were already made public via their openly displayed badges.

CI-21-00277

- 42. As to the other participants in the protest, they voluntarily chose to participate in a demonstration occurring in the public sphere. There is no privacy risk that was not assumed by their attendance at this event.
- 43. Finally, the objection raised in providing this requested information was that given the length of the video it would be difficult to redact. *See* Exhibit B. There, however, is no provision of Act 22 that provides Respondent the option to not provide responsive footage based on the length of the footage. Moreover, as noted, there is no need for redaction given the public nature of this footage.

RELIEF SOUGHT

Wherefore, Petitioners ask this Honorable Court to:

- 1. Grant this Petition for Review and order access to the sought record; or
- 2. In the alternative, grant this Petition for Review and establish a briefing schedule or set a date for an evidentiary hearing; and,
- 3. Grant such other relief to Petitioners as may be appropriate or justified under law.

CI-21-00277

Respectfully submitted,

Dated: January 13, 2021

/s/ Terry Mutchler

Terry Mutchler (Pa. ID No. 308052) Silvio Trentalange (Pa. ID No. 320606)

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1500 Market Street, Suite 3500E

Philadelphia, PA 19102

T: 215-575-7000 F: 215-575-7200

tmutchler@dilworthlaw.com strentalange@dilworthlaw.com

Counsel for Petitioners

VERIFICATION

On this the 12th day of January, 2021, I hereby certify that the facts within this Petition for Review are true and accurate to the best of my knowledge, information, and belief. I understand that false statements made herein are subject to the penalties of 18 Pa C S. § 4909, relating to unsworn falsification to authorities.

Harubie Meko CI-21-00277

CI-21-00277

Exhibit A

Law Enforcement Recording Request Form - Act 22cton is all your filed***

This form can be used to request law enforcement recordings ("any audio recording or video reaction for beta by a law enforcement agency") under Act 22 of 2017. Note that the Right-to-Know Law does not apply to such recordings. Any denials must be appealed to the appropriate Court of Common Pleas, not the Office of Open Records.

SUBMITTED TO AGENCY NAME: Lancaster City Bureau of Police (LCBP) (Attn: AORO)
Date of Request: 11/13/2020 Submitted via: U.S. Mail In Person (Act 22 requires requests to be submitted via "personal delivery or certified mail.")
PERSON MAKING REQUEST:
Name: <u>Hurubie Meko</u> Company (if applicable): <u>LNP LancasterOnline</u> CI-21-00277
Mailing Address: 101 N. Queen Street
City: Lancaster State: PA Zip: 17603 Email: hmeko@lnpnews.com
Telephone: (717) 344-4476 Fax:
How do you prefer to be contacted if the agency has questions? $\ \Box$ Telephone $\ \Box$ Email $\ \Box$ U.S. Mail
RECORDING REQUESTED: Requests must be submitted within 60 days of the event recorded. All of the following information is <u>required</u> . Be thorough; use additional pages if necessary.
Date and Time of the Event: September 13, 2020 from 10:30 p.m. to 7:00 a.m.
Location of the Event: <u>Outside LCBP headquarters</u> ; intersection of N. Prince Street and Chestnut Street
Describe the Event: The evening of the shooting of Ricardo Munoz on Sept. 13, a large crowd of protesters gathered outside of the LCBP headquarters in Lancaster city and demonstrated throughout the evening and into the morning. Multiple times in the evening, police and the protesters clashed resulting in tear gas, foam rounds and/or rubber bullets and other crowd control measures being deployed by LCBP and the county's SERT team. In addition, multiple protesters were arrested for arson and looting related activities that were witnessed by officers, according to charging documents. Multiple news agencies as well as private citizens were recording video and still photos of the events, which took place on public streets and sidewalks.
Describe Your Relationship to the Event: As an investigative reporter with LNP LancasterOnline I was following the situation unfolding the night of Sept. 13 closely — I was watching live feeds from protesters, tweets from my colleagues and news reports. However, the missing piece to a more complete public understanding of what occurred that night is the police body camera footage. To work on a story that gives a complete, comprehensive and accurate explanation of what occurred the evening of Sept. 13 in Lancaster city between police and protesters, the body camera footage is vital. If the Event Occurred in a Residence, Identify All People Present (unless unknown & not reasonably ascertainable): N/A

If an Act 22 request is granted, the agency may charge "reasonable fees" to provide a copy of the recording.

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	is FOR AGENCY USE ONLY State	
Tracking:	Date Received:	Response Due (30 cal. days):
Extension? Yes	☐ No (If Yes, Final Due Date:) Actual Response Date:
Request was: 🗆 Gr	ranted	nied Denied Cost to Requester: \$

CI-21-00277

CI-21-00277

Exhibit B



DEPARTMENT OF ADMINISTRATIVE SERVICES

December 14, 2020

Ms. Hurubie Meko LNP | Lancaster Online 101 North Queen Street Lancaster, PA 17603

Sent via email only - Hmeko@LNPnews.com

CI-21-00277

Dear Ms. Meko:

We have received your Act 22 of 2017 request for body camera video from November 13, 2020 from 10:30 p.m. to 7:00 p.m. outside LCBP headquarters; intersection of North Prince Street and Chestnut Street, relating to: "The evening of the shooting of Ricardo Muniz on September 13, a large crowd of protestors gathered outside the LCBP headquarters in Lancaster City and demonstrated throughout the evening and into the morning. Multiple times in the evening, police and the protestors clashed resulting in teargas, foam rounds and/or rubber bullets and other crown control measures being deployed by LCBP and the County's SERT team. In addition, multiple protestors were arrested for arson and looting related activities that were witnessed by officers, according to charging documents. Multiple news agencies as well as private citizens were recording video and still photographs of the events, which took place on public streets and sidewalks."

The video you have requested contains numerous incidences of unrest that are part and parcel of riot and other criminal charges currently pending before the Court of Common Pleas. Given the length of the acts alleged in those charges and the variety of acts involved, there is no reasonable method in which to redact the audio and video from the requested body camera footage so as to safeguard the investigative information and ensure a fair trial for both the defendants and the Commonwealth. Pursuant to Section 67A04(a) of Act 22 of 2017, your request is denied in that the City of Lancaster Bureau of Police in conjunction with the District Attorney's Office of the County of Lancaster has determined that the requested video contains potential evidence in a criminal matter, information pertaining to an investigation, or a matter in which criminal charges have been filed, confidential information or victim information and the reasonable redaction of the audio or video recording would not safeguard potential evidence, information pertaining to an investigation, confidential information or victim information.

Pursuant to Section 67A05 of the Act, you have the right to appeal this determination to the Court of Common Pleas of Lancaster County within thirty (30) days of the date of this letter.

Sinderely,

Patrick S. Hopkins Business Administrator

Open Records Officer

PO BOX 1599 120 N. DUKE STREET LANCASTER, PENNSYLVANIA 17608-1599
(T) 717-291-3556 (FAX) 717-291-4722
WWW.CITYOFLANCASTERPA.COM

LANCASTER

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY

HURUBIE MEKO and LNP MEDIA GROUP, INC.,	:	
,	:	Case No.
Petitioners,	:	
	:	
v.	:	•
~~~	:	
CITY OF LANCASTER,	:	
	:	CI-21-00277
Respondent.	:	

# **CERTIFICATE OF SERVICE**

Pursuant to 42 Pa.C.S. § 67A06 (b)(4), I hereby certify that this Petition and its attachments will be served upon the Open Records Officer of Respondent within five (5) days of the date of filing with this Court, by certified mail with proof of service.

/s/ Terry Mutchler
Terry Mutchler
Counsel for Petitioners

# IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY

HURUBIE MEKO and LNP MEDIA
GROUP, INC.,

Petitioners,

Case No. 21-00277

Case No. 21-00277

CITY OF LANCASTER,

Respondent.

# ORDER OF RULE TO SHOW CAUSE

Upon consideration of the attached Petition, it is hereby ordered that:

- 1. A rule is issued upon the Respondent to show cause as to why the Petitioners are not entitled to the relief requested.
  - 2. Respondent shall file an answer to the Petition within twenty (20) days.
  - 3. The Petition shall be decided under Pa.R.C.P. 206(7).
  - 4. Discovery shall be completed within forty-five (45) days of service of the answer.
  - 5. Petitioner shall file a brief within twenty (20) days after the discovery deadline.
- 6. Any party opposing the Petition shall file a responsive brief within ten (10) days of service of Petitioner's brief.
- 7. Petitioner may file a reply brief within five (5) business days of service of the responsive brief.
- 8. After all briefs have been filed, the Prothonotary shall notify the assigned Judge and forward the file to chambers for disposition. Any party may request oral argument by filing a praecipe requesting it when filing their brief.

	BY THE COURT:	
	·	J.

Petitioner shall provide notice of the entry of this Rule to all parties.

9.

# IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTRICE M. Dehl

GROUP, INC.,	; ;	
Petitioners,	: Case No	
v.	:	
CITY OF LANCASTER,	: :	
Respondent.	<b>:</b> :	CI-21-00277

# **CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Signature:	/s/ Terry Mutchler				
Name:	TERRY MUTCHLER				
Attorney No.: 308052					
Case Docket Number:					

# ENTERED AND FILED IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYPHONOTARY'S OFFICE

PROTHONOTARY CIVIL COVER SHEET

LANCASTER, PA ***Electronically Filed***

PLEASE LIST NAMES AND ADDRESSES OF ADDITIONAL PARTIES ON A SEPARATE SHEET. ALL PARTY INFORMATION IS REQUIRED INCLUDING ZIP CODES & PARTY INFORMATION MUST MATCH THE PLEADING._PLEASE DO NOT STAPLE THE COVER SHEET TO THE PLEADING. IF AN EVENT NEEDS TO BE SCHEDULED, A CAO SCHEDULING COVER SHEET MUST ALSO BE ATTACHED

TYPE OF ACTION: Civil Appeal - Petition for Review re Act 22

Request for Body Camera Footage

For Prothonotary use only: DOCKET No. CI-

# **PARTY INFORMATION**

PLAINTIFF'S NAME: Hurubie Meko and LNP Media

DEFENDANT'S NAME: City of LSTes 21-00277

ADDRESS (if confidential, use 2nd sheet)

ADDRESS:

101 N. Queen St.

120 N. Duke Street

MUNICIPALITY/TWP: Lancaster, PA 17603

MUNICIPALITY/TWP: Lancaster, PA 17608

DOB:

DOB:

TELEPHONE #:

**TELEPHONE #:** 

# FILING ATTORNEY/ FILING PARTY INFORMATION

FIRM/OFFICE: Dilworth Paxson, LLP

FILING ATTORNEY/PARTY: Terry Mutchler, Esq. (Counsel for Petitioners)

AOPC (Attorney ID) # 308052

ADDRESS: 1500 Market Street, Philadelphia

STATE: PA

ZIP CODE: 19102

TELEPHONE #: 215-575-7000

E-MAIL: tmutchler@dilworthlaw.com

# **TAX LIEN INFORMATION**

MAP REFERENCE:

MUNICIPALITY:

WARD:

SALE PRICE:

**DEED BOOK:** 

**DEED PAGE:** 

PROPERTY DESCRIPTION:

DEED DATE:

TAX YEAR:

TAX LIEN AMOUNT:

# **PFA INFORMATION**

**HEARING DATE:** 

SOCIAL SECURITY # (Defendant-last 4 digits)

POLICE DEPARTMENT:

PREVIOUS PETITIONS:

# Supreme Count of Pennsylvania Court of Common Pleas Civil Cover Sheet Lancaster County

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PROTHONOTARY'S OFFICE	Ē

For Prothonotary Use Only: ***Electr	CASTER, PA pnically Filed***
Docket No: Jan 1	2021 04:04PM ci M. Dehl

	The information collected on this for supplement or replace the filing and	form is used I service of	d solely for pleadings o	court administratio or other papers as re	n purposes. equired by la	This form does not w or rules of court.
S E	Commencement of Action:			Petition Declaration of Taking		<u> </u>
C T	Lead Plaintiff's Name: Hurubie Meko			Lead Defendant's Nam City of Lancaster	ne:	
I O	Are money damages requested? ☐ Yes ☑ No		⊠ No	Dollar Amount Requested:		
N	Is this a Class Action Suit?	☐ Yes	⊠ No	Is this an <i>MD</i>	J Appeal?	☐ Yes ☑ No
A	Name of Plaintiff/Appellant's Attorn  Check here if ye			squire (are a Self-Represer	nted [Pro Se	e] Litigant)
•	Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your PRIMARY CASE. If you are making more than one type of claim, check the one that you consider most important.					
S E C T I O N	TORT (do not include Mass Tort)  Intentional Malicious Prosecution Motor Vehicle Nuisance Premises Liability Product Liability (does not include mass tort) Slander/Libel/ Defamation Other:  MASS TORT Asbestos Tobacco Toxic Tort - DES	Bu De De De Di Di En Di	yer Plaintiff bbt Collection bbt Collection pployment D scrimination	n: Credit Card n: Other	Board Board Dept. Statu Zonin  Other	rative Agencies d of Assessment d of Elections of Transportation tory Appeal: Other
В	Toxic Tort - Implant Toxic Waste Other:  PROFESSIONAL LIABLITY Dental Legal Medical Other Professional:	Eje En En Gr La Mo	ound Rent ndlord/Tena ortgage Fore ortgage Fore rtition tiet Title	in/Condemnation	Common Declar Mand	LANEOUS mon Law/Statutory Arbitration aratory Judgment damus Domestic Relations raining Order Warranto evin