

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD REILLY , as Administrator	:	
Of the Estate of Veronique Aundra Henry	:	
	:	
	:	
V.	:	1:18-cv-01803
	:	Magistrate Judge Carlson
	:	
	:	
YORK COUNTY	:	

MOTION TO INTERVENE AND UNSEAL

The *York Daily Record, LLC* hereby moves to intervene in this matter for the limited purpose of seeking an order unsealing the following settlement records: (1) Petition for Court Approval of Settlement, filed on Mar. 22, 2021; (2) the Second Motion to Seal and First Motion for Order for Settlement, filed on Apr. 6, 2021; and (3) the Amended Order for Approval of Settlement and Distribution of Proceeds, filed on Apr. 6, 2021. *See* Dkt. Nos. 89, 92 and 93. In support of its motion, the *York Daily Record* relies on the accompanying Memorandum of Law and the exhibit attached thereto.

WHEREFORE the *York Daily Record* respectfully requests that this Court grant the motion to intervene and enter an order unsealing the aforementioned sealed materials.

Date: July 5, 2022

By: /s/ Paula Knudsen Burke

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Certification of Compliance Pursuant to Local Rule 7.1

I hereby certify that pursuant to Local Rule 7.1, I sought concurrence from counsel for each of the parties to this action to determine their concurrence or non-concurrence in the instant Motion to Intervene and Unseal.

The following counsel do not concur in the motion:

- John R. Ninosky, counsel for PrimeCare Medical, Inc. and medical defendants.
- Donald L. Reihard, counsel for York County, Board of Inspectors of the York County Prison and John Doe York County defendants

I was not able to obtain a position from Joshua A. Anstine and Leticia C. Chavez-Freed, counsel for the Plaintiff.

Date: July 5, 2022

/s/ Paula Knudsen Burke

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served the above Motion to Intervene and Unseal via the District Court's Electronic Filing System and via electronic mail on July 5, 2022 to counsel of record as follows:

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