

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>THERESA M. SERANO,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	<b>No. 5:21-CV-00084-JLS</b>
<b>v.</b>	:	
	:	
<b>OFFICER KYLE GOLDEN, et al.,</b>	:	
	:	
<b>Defendants.</b>	:	

**MOTION TO INTERVENE AND AMEND ORDER**

*The Morning Call* hereby moves to intervene in this matter for the limited purpose of seeking an amended Confidentiality Order (Dkt. No. 29, filed Oct. 6, 2021) specifying that a state judicial order granting access to settlement terms via a Right to Know Law request constitutes valid legal process. In support of its motion, *The Morning Call* relies on the accompanying Memorandum of Law.

WHEREFORE *The Morning Call* respectfully requests that this Court grant the motion to intervene and enter an amended Limiting Order specifying that a state judicial order granting access to settlement terms via a Right to Know Law request constitutes valid legal process.

Date: December 9, 2022

By: /s/ Paula Knudsen Burke  
Paula Knudsen Burke  
REPORTERS COMMITTEE FOR  
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*Attorney for The Morning Call*

**ORDER**

AND NOW, this \_\_\_ day of December 2022, upon consideration of *The Morning Call's* Motion to Intervene and Amend Order, it is ORDERED as follows:

1. *The Morning Call's* Motion to Intervene and Amend is GRANTED. Their Motion to Amend Order is also GRANTED.
2. The Order dated October 6, 2021 (Dkt. No. 29) is hereby amended as follows:

Plaintiff, Theresa M. Serano, her counsel, Defendant Kyle Golden, and his counsel, are each barred from making public disclosure of the settlement terms between the parties and of the underlying allegations and claims brought in this matter unless pursuant to other valid legal process following reasonable notice to opposing counsel or further order of Court. "Other valid legal process" or "further Order of Court" may include, but is not limited to, an order from a Pennsylvania Court of Common Pleas pursuant to the Right to Know Law, 65 P.S. §§ 67.101 *et seq.*

BY THE COURT:

\_\_\_\_\_  
J.

**CERTIFICATE OF SERVICE**

I, Paula Knudsen Burke, hereby certify that I have served a copy of the foregoing Motion to Intervene and Amend Order upon the following counsel via the Electronic Case Filing System of the U.S. District Court for the Eastern District of Pennsylvania, on the date indicated below:

Joshua E. Karoly  
Karoly Law Firm LLC  
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*For the Plaintiff*

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*For Defendant Officer Kyle Golden*

Paul G. Lees  
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*For Defendant Township and John/Jane Does*

I have served a copy of the foregoing Motion to Intervene and Amend Order upon the following counsel via email:

Jennifer R. Alderfer  
Zator Law  
4400 Walbert Avenue at Ridgeview Drive  
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[jalderfer@zatorlaw.com](mailto:jalderfer@zatorlaw.com)  
*Solicitor for South Whitehall Township*

Date: December 9, 2022

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**CERTIFICATION OF COMPLIANCE PURSUANT TO LOCAL RULE 7.1(b)**

I hereby certify that pursuant to Local Rule 7.1(b), I sought the position of counsel for each party to this action to determine if the foregoing motion would be uncontested.

The following counsel do not concur in the motion seeking an amended order as attached:

- Geoffrey B. Gompers, Counsel for Officer Kyle Golden.
- Paul G. Lees, Trial Counsel for the South Whitehall Township in the above-captioned action.
- Joshua E. Karoly. Mr. Karoly has not replied with a position as of today's date.

The following attorney does not take a position on the motion seeking an amended order as attached:

- Jennifer Alderfer, Solicitor for South Whitehall Township

Date: December 9, 2022

Respectfully submitted,

By: /s/ Paula Knudsen Burke

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