

Paula Knudsen Burke  
REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS  
Pa. I.D.: 87607  
P.O. Box 1328  
Lancaster, PA 17608  
pknudsen@rcfp.org

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EXETER TOWNSHIP,	:	<b>IN THE COURT OF COMMON PLEAS</b>
	:	<b>OF BERKS COUNTY, PENNSYLVANIA</b>
Plaintiff,	:	
	:	
v.	:	
	:	
JERRY GELEFF, an adult individual;	:	CIVIL ACTION—LAW
THE EXETER EXAMINER, an	:	NO. 22-16476
unincorporated business;	:	
THE EXETER UNDERGROUND, an	:	
unincorporated business;	:	
and JERRY GELEFF MEDIA,	:	
	:	
Defendants.	:	

**MOTION TO DISSOLVE INJUNCTION**

Pursuant to the Pennsylvania Rules of Civil Procedure 1531(c), Defendants Jerry Geleff, the Exeter Examiner, the Exeter Underground and Jerry Geleff Media, by and through undersigned counsel, hereby move to dissolve the injunction entered in the above-captioned case, and in support thereof state as follows:

1. On December 15, 2022, this Court issued an order (the “Order”) enjoining Defendants from possessing, publishing, or otherwise disseminating information obtained from a confidential source through Defendants’ constitutionally protected newsgathering.

2. The Order is unconstitutional and contravenes a near-century of Supreme Court jurisprudence striking down prior restraints on speech as violative of the First Amendment.

3. Pennsylvania Rule of Civil Procedure 1531(c) provides: “Any party may move at any time to dissolve an injunction.” Pa.R.Civ. P. 1531(c).

4. For the foregoing reasons, and those set forth in detail in Defendants' accompanying Memorandum of Law in Support of Motion to Dissolve Preliminary Injunction, Defendants respectfully request that the Order be dissolved immediately and that the Court enter the relief sought in the proposed order attached hereto.

Dated: December 23, 2022

Respectfully submitted,

*/s/ Paula Knudsen Burke*

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**CERTIFICATES OF SERVICE AND COMPLIANCE**

I hereby certify service of the foregoing Motion to Dissolve Preliminary Injunction, as well as all attachments thereto, upon the persons, in the manner, and on the date indicated below:

BY EMAIL

Tucker R. Hull (PA 306426)  
Law Office of Tucker R. Hull, LLC  
tucker@tucker-hull-law.com  
*Counsel for Plaintiffs*

J. Chadwick Schnee (PA 306907)  
Law Office of Tucker R. Hull, LLC  
chadwick@tucker-hull-law.com  
*Counsel for Plaintiffs*

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

Submitted by: Paula Knudsen Burke

Signature: /s/Paula Knudsen Burke

Attorney No.: 87607

Date: December 23, 2022