

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

CHARLES JOSEPH FREITAG, JR., as  
Administrator of the ESTATE OF  
CHARLES JOSEPH FREITAG, SR.,  
Plaintiff,

v.

BUCKS COUNTY, *et al.*,  
Defendants.

Civil No. 2:19-cv-05750-JMG

**MOTION TO INTERVENE AND UNSEAL**

The *Bucks County Courier Times*<sup>1</sup> hereby moves to intervene in this matter for the limited purpose of seeking an order unsealing the following settlement record: Petition for Court Approval of Settlement, filed on Nov. 3, 2022. *See* Dkt. Nos. 133. In support of its motion, the *Bucks County Courier Times* relies on the accompanying Memorandum of Law.

WHEREFORE the *Bucks County Courier Times* respectfully requests that this Court grant the motion to intervene and enter an order unsealing the aforementioned sealed record.

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<sup>1</sup> The corporate entity which publishes the *Bucks County Courier Times* is GateHouse Media Pennsylvania Holdings, Inc. d/b/a the *Bucks County Courier Times*.

Date: May 4, 2023

By: /s/Paula Knudsen Burke

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**CERTIFICATE 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 nonconcurrence in the instant Motion to Intervene and Unseal. This motion is not certified as uncontested. Specifically, the following counsel take no position on the motion:

- Jonathan H. Feinberg, counsel for the Plaintiff.

The following counsel do not concur in the motion:

- John R. Ninosky, counsel for PrimeCare Medical, Inc. and medical defendants.

As of the time of this filing, I was not able to obtain a position from counsel for the other defendants.

Date: May 4, 2023

/s/ Paula Knudsen Burke  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she served the above Memorandum of Law via the District Court's Electronic Filing System and via electronic mail on May 4, 2023, to counsel of record as follows:

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**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of the *Bucks Country Courier Times*' Motion to Intervene and Unseal, and for good cause shown, it is ORDERED as follows:

1. The Motion is GRANTED.
2. The *Bucks Country Courier Times* is permitted to intervene.
3. The Court hereby Orders that access shall be granted and the following docket entry unsealed: Petition for Court Approval of Settlement, filed on Nov. 3, 2022. *See* Dkt. No. 133.
4. The identified docket entries and docketed transcripts shall be unsealed on or before June 14, 2023.

\_\_\_\_\_  
Judge, United States District Court