

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

NINA M. HARBAUGH, as Administrator
of the ESTATE OF BRITTANY ANN
HARBAUGH.,

Plaintiff,

v.

BUCKS COUNTY, *et al.*,
Defendants.

Civil No. 2:20-cv-01685-MMB

MOTION TO INTERVENE AND UNSEAL

The *Bucks County Courier Times*¹ hereby moves to intervene in this matter for the limited purpose of seeking an order unsealing the following settlement record and any related records: Motion Filed Under Seal to Approve Settlement and Distribution of Records, filed January 09, 2023 (*see* Dkt. No. 78); Order Re: 78 Motion for Settlement Filed Under Seal filed January 20, 2023 (*see* Dkt. No. 79); and Order that 77 Motion to Seal is Granted, filed January 20, 2023 (*see* Dkt. No. 80). 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 materials.

Date: October 31, 2023

/s/Paula Knudsen Burke

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

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[PROPOSED] 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 entries unsealed: Motion Filed Under Seal to Approve Settlement and Distribution of Records, filed January 09, 2023 (*see* Dkt. No. 78); Order Re: 78 Motion for Settlement Filed Under Seal, filed January 20, 2023 (*see* Dkt. No. 79); and Order that 77 Motion to Seal is Granted, filed January 20, 2023 (*see* Dkt. No. 80).
4. The Clerk is directed to redact the names of any minors referenced in Dkt. Nos. 78, 79 and 80.
5. The identified docket entries shall be unsealed on or around November 17, 2023.

Judge, United States District Court

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 these positions on the motion:

- David Inscho, on behalf of the Plaintiff, does not concur.
- Jeffrey M. Scott, on behalf of the Defendant County of Bucks, indicates that his client takes no position.
- John R. Ninosky, on behalf of Defendant PrimeCare, does not concur.

Dated: October 31, 2023

/s/Paula Knudsen Burke

Paula Knudsen Burke
PA ID 87607

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 October 31, 2023, to counsel of record as follows:

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Dated: October 31, 2023

/s/Paula Knudsen Burke

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