

**IN THE SUPERIOR COURT OF PENNSYLVANIA
WESTERN DISTRICT**

Joe Myers, **Appellant**

vs.

Timothy F. McCune, Joseph H. Chivers,
John/Jack W. Murtagh Jr., Graydon
Brewer, Carl V. Nanni, Jack Lewis, Jim
Gallagher, Hank Leyland, Greg Loverick,
Edward Tasse, AK Steel et al, UAW
(formerly Butler Armco Independent
Union) et al, Angelo Papa, William
Cunningham, Michael Lettrich, Maria Milie
Jones, Dennis Roman, Nicholas Koch,
Adam Hobaugh, **Appellees**



Superior Court Docket No. 1892 WDA 2019

Appellant's Demur Of Recent Orders

Notice is hereby given that Joe Myers, Appellant above named, hereby appeals to the Superior Court of Pennsylvania from the order entered in this matter on the 8th day of June, 2020. This order has been entered in the docket as evidenced by the attached copy of the docket entry.

CIVIL DIVISION

Joe Myers
12137 Emerald Green Court
Jacksonville, Florida 32246

IN THE SUPERIOR COURT OF PENNSYLVANIA WESTERN DISTRICT

Joe Myers, **Appellant**

vs.

Timothy F. McCune, Joseph H. Chivers,
John/Jack W. Murtagh Jr., Graydon
Brewer, Carl V. Nanni, Jack Lewis, Jim
Gallagher, Hank Leyland, Greg Loverick,
Edward Tasse, AK Steel et al, UAW
(formerly Butler Armco Independent
Union) et al, Angelo Papa, William
Cunningham, Michael Lettrich, Maria Milie
Jones, Dennis Roman, Nicholas Koch,
Adam Hobaugh, **Appellees**

Superior Court Docket No. 1892 WDA 2019

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CIVIL DIVISION

Joe Myers
12137 Emerald Green Court
Jacksonville, Florida 32246

RELATED CASES

Joseph Myers, (Plaintiff)

v.

*AK Steel Corporation and Butler Armco
Independent Union, U.A.W. (Defendants)*

and

*Joseph G. Myers, (Plaintiff) v. Joseph
Chivers, (Defendant)*

Court filings:

- **Complaint – Jury Trial Demanded** dated 4-23-04 but Time/Date Stamped the day before 4-22-04
- **Complaint For Legal Malpractice Breach Of Contract, Failure To Timely File/Breach Of Contract, No Justification Of Fee Charged To Plaintiff** dated 6-1-04 but not Time/Date Stamped until 6-17-04
- **Conflict of Interest** dated 11-20-07

A.D. No. 04-10707

Joe Myers, (**Plaintiff**)

v.

Timothy F. McCune, Joseph H. Chivers,
John/Jack Murtagh Jr., Graydon Brewer, Carl
V. Nanni, Jack Lewis, Jim Gallagher, Hank
Leyland, Greg Loverick, Edward Tasse, AK
Steel et al, UAW (formerly Butler Armco
Independent Union) et al, Angelo Papa,
William Cunningham, Michael Lettrich, Maria
Millie, Jones, Dennis Roman, Nicholas Koch,
Adam Hobaugh, (**Defendants**)

Court filings:

- **Complaint** dated 5-29-19
- **Response to SCHEDULING ORDER**
dated 9-19-19
- **All Defendants are in Contempt of
Court and Obstructing Justice** dated 9-28-
19
- **Legal Notice and Violation Warning
of Denial of Rights Under Color of Law**
dated 10-16-19
- **Amended Legal Notice and Violation
Warning of Denial of Rights Under Color
of Law** dated 10-18-19

- ***Amended Court Filing Adding Defendants and For Continued Violation of Plaintiff's Constitutional Rights*** dated 10-28-19
- ***Response to Motion To Strike by Defendant Koch and to Any Future Court Filings By Any Defendant Trying to Violate Plaintiff's Constitutional Rights*** dated 11-25-19
- ***Notice of Appeal*** dated 12-18-19
- ***Concise Statement of Matters Complained of on Appeal*** dated 2-4-20

NO. A.D. No. 19-10516

Joe Myers, (**Appellant**)

v.

Timothy F. McCune, Joseph H. Chivers,
John/Jack Murtagh Jr., Graydon Brewer, Carl
V. Nanni, Jack Lewis, Jim Gallagher, Hank
Leyland, Greg Loverick, Edward Tasse, AK
Steel et al, UAW (formerly Butler Armco
Independent Union) et al, Angelo Papa,
William Cunningham, Michael Lettrich, Maria
Millie, Jones, Dennis Roman, Nicholas Koch,
Adam Hobaugh, (**Appellees**)

Court filings:

- **Superior Court of Pennsylvania
Docketing Statement** dated 1-7-20
- **Motion For Relief, Motion For
Extension For Rule 1925(b) Order**
- **Response To Rule 1925(b)
Fraudulent/Illegal Order Time/Date
Stamped 2-4-20**
- **Response to Supreme Court Order
dated 2-18-20, Writ Of Mandamus,
Extraordinary Jurisdiction, Request For
Extension For Filing Brief**

Case No.: 1892 WDA 2019

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ORDERS DO NOT FOLLOW THE LAW

Appellant files this **DEMUR** as the recent **ORDERS** dated 5-26-20 and 5-27-20 do not follow the **CONSTITUTUION** of the United States of America which is the SUPPREME LAW of the land as well as the SUBSTANTIVE LAW. *The Superior Court of Pennsylvania* nor ANY COURT can use Rules of Procedure to USURP RIGHTS and Black's Law Dictionary is very clear on the definition of **SUBSTANTIVE LAW**:

"That part of the law which the courts are established to administer, as opposed to the rules according to which the substantive law itself is administered. That part of the law which creates, defines, and regulates rights, as opposed to adjective or remedial law, which prescribes the method of enforcing rights or obtaining redress for their invasion."

Appellant further proves the Appellant's argument as explained in Appellant's recent court filing, **Appellant's Reply To All Appellee's Briefs**.

THE FOUNDING DOCUMENTS are **SUCCESSIVE** in the **PROTECTION** of **INDIVIDUAL RIGHTS!**

THE PEOPLE of this great country fought the **REVOLUTION** because King George continued to USURP the RIGHTS of the **Colonists!**

After the **Colonists** WON the war they declared **OUR** independence and spelled out in the **Declaration of Independence** Our God-given Rights that **NO** government elected and appointed position can grant or take away from **ANYONE**. The **Declaration of Independence** also spelled out the **USURPATIONS** of King George that Appellee Cunningham has UNLAWFULLY attempted to deny Appellant and this Court is attempting also with the recent UNLAWFUL ORDERS.

WE THE PEOPLE then wrote the **PREAMBLE** to the **CONSTITUTION** of the United States of America. The **PREAMBLE** clearly stated **THE PEOPLE** wanted JUSTICE and to protect the Blessings of Liberty for EVERYONE!

The **CONSTITUTION** was written to **RESTRICT ANYONE** in the legislative, executive and judicial positions BUT NOT to restrict THE RIGHTS OF THE PEOPLE!

THE PEOPLE were still concerned that anyone in legislative, executive and judicial positions would attempt to **USURP INDIVIDUAL RIGHTS** so **THE PEOPLE** ratified the **PREAMBLE** to the **BILL OF RIGHTS** as well as the first **10 Amendments** to FURTHER DECLARE and RESTRICT those in government positions from MISCONSTRUCTION or ABUSE of its POWERS which Appellee Cunningham and this Court is attempting misconstrue and abuse the RIGHTS of Appellant!

*"The Conventions of a number of the States, having at the time of their adopting the Constitution expressed a desire in order to prevent misconstruction or abuse of its powers, that further declaratory and restrictive clauses should be added:
And as extending the ground of public confidence in the*

Government will best ensure the beneficent ends of its institution." **Bill of Rights PREAMBLE** (Emphasis added)

The **BILL OF RIGHTS** without question **GUARANTEES** Appellant a **JURY TRIAL** and Appellee Cunningham and this Court **CANNOT DENY** Appellant that RIGHT!

Then the 14th Amendment was ratified some 70 years after the **BILL OF RIGHTS** which further restricts the government and specifically the States from enforcing ANY LAW which abridges the privileges of Appellant.

"All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." **14th Amendment**

DEMUR OF MAY 26, 2020 ORDER

This **ORDER** must be **STRIKEN** from the record as Appellee Papa has LIED to the Court on numerous issues.

The following points are **FRAUD** committed by Appellee Papa when he filed ***Appellee's Petition to Strike Angelo Papa from Caption & for Misjoinder of Brief*** and Appellant will provide them as follows:

- Appellee Papa's ***point 5*** states he was not served when IN FACT he was and Appellant proved that in Appellant's recent court filing ***Appellant's Reply To ALL Appellee's Briefs.***
- In Appellant's recent court filing ***Appellant's Reply To ALL Appellee's Briefs*** Appellant stated Appellee Papa LIED to the court when Appellee Papa stated on his ***point 8*** "never naming or serving this Defendant in the new action with no reference to mal practice" when IN FACT Appellant did name

Appellee Papa in the initial **Complaint** filed on 5-29-19 on **point 24** of the court filing. Appellant stated "Papa had ample time and much more evidence but even Papa committed legal malpractice as well as by not filing properly."

- To further prove Appellee Papa's **LIES** Appellant has **appended** the court filing by Appellant filed dated 8-7-19 **PRAECIPE of NOTICE to add DEFENDANT PAPA'S name to COMPLAINT and ALL PLEADINGS/PRAECIPE of NOTICE OF IGNORING THE COMPLAINT by certain DEFENDANTS**. In this court filing Appellant clearly states in the very first sentence "Defendant Papa's name was mistakenly missing from the heading of Plaintiff's Complaint and all subsequent pleadings even though he was referenced in said documents so this is to notify the court that Defendant Papa has been added in the heading. Attached is the

email dated 7-27-19 from Plaintiff to Defendant Papa apprising Papa of the Complaint filed by Plaintiff." So Appellee Papa knew this and is now why he has asked the court **TO CHANGE HIS EMAIL**. Appellee Papa's email was CEO@SignatureHill.com that Appellant sent the email to.

DEMUR OF MAY 27, 2020 ORDER

The part of the **ORDER** of court filing **Application to Correct Case and for Ancillary Relief** to remove Appellees *Cunningham, Papa, Lettrich, Jones, Roman, Koch and Hobaugh* from the caption must be **STRIKEN** from the record as the **UNLAWFUL ORDER** is **UNCONSTITUTIONAL!**

Appellant has the **LAWFUL CONSTITUTIONAL RIGHT** to add any party to the filing because Appellant gave ALL aforementioned Appellees fair warning and legal notice when Appellant mailed the **Warning Letter** for **Denial of Rights**

Under Color of Law to every Appellee and then Appellant added all the ***Warning Letters*** to court filing ***AMENDED LEGAL NOTICE AND VIOLATION WARNING OF DENIAL OF PLAINTIFFS RIGHTS UNDER COLOR OF LAW OF THE UNITED STATES OF AMERICA*** and this court filing was appended to the recent court filing ***Appellant's Reply To ALL Appellee's Briefs*** by Appellant.

This court knows that as per the aforementioned definition of SUBSTANTIVE LAW and the SUCCESSIVE mandates of the FOUNDING DOCUMENTS this court CANNOT USE rules of procedure to deny Appellant his RIGHT TO PROPERTY!

Appellee Koch ***VALIDATED*** in his *Reply Brief* that even the Pennsylvania Constitution restricts this COURT or ANY court from using rules of procedure to deny ANY RIGHTS of Appellant!

"if such rules are consistent with this Constitution and neither abridge, enlarge nor modify the substantive rights of

any litigant" – Appellant's case proves ALL Appellees are using procedure that **ARE NOT CONSISTENT** with the **Constitution** and the **RULES** most certainly **ABRIDGE** Appellant's **SUBSTANTIVE RIGHTS**.

FURTHERMORE ALL Appellees knew the lower court dismissed the Rules of Procedure as the following evidence proves:

- The lower Court threw out the Rules of Procedure when the Court allowed **Appellee Koch** to file his Notice of Appearance filed on 6-21-19 AFTER Koch filed his Preliminary Objections and Brief in Support of Preliminary Objections to Plaintiff's Complaint on 6-19-20.
- The lower Court threw out the Rules of Procedure when the Court, almost FOUR MONTHS after Appellant's initial Complaint (appended) was filed on 5-29-19, allowed **Appellee Hobaugh** to file

his Notice of Appearance, Preliminary Objections and Brief in Support of Preliminary Objections to Plaintiff's Complaint on 9-24-20.

- The lower Court threw out the Rules of Procedure when the Court, almost FIVE MONTHS after Appellant's initial Complaint (**appended**) was filed on 5-29-19, allowed **Appellee Papa** to file his Limited Special Appearance Preliminary Objections on 10-22-20.
- On 10-16-19 Appellant filed Notice to Butler County, Notice of Judicial Misconduct, Attorney Misconduct. This **appended** court filing called into question the illegal acts of **ALL Appellees** with a law license and specifically Appellee Cunningham.
- **All APPELLEES** were warned when on 10-21-19 Appellant filed Amended Legal Notice & Violation

Warning of Denial of Plaintiff's Rights Under Color of Law of the United States of America.

The **appended** court filing had the Color of Law Violation Warning letter for every **Appellee** as part of the filing.

- On 10-29-19 Appellant filed Amended Court Filing Adding Defendants & for Continued Violation of Plaintiff's Rights Under Color of Law of the United States of America. The **appended** court filing adds **ALL Appellees** with a law license as **DEFENDANTS** which at that point **Appellee Cunningham** was prohibited from any further judicial actions and lawfully had to recuse himself from Appellant's case INSTEAD Appellee Cunningham went ahead and filed his unlawful OPINION on 11-21-19.
- **Appellee Koch** filed a Motion to Strike on 11-19-19 against Appellant's Amended Court Filing

Adding Defendants & for Continued Violation of Plaintiff's Rights Under Color of Law of the United States of America again siting Appellant must follow *Rules of Procedure* YET APPELLEES DID NOT HAVE TO FOLLOW THE SAME RULES or the LAW!

This case started when **Appellee AK Steel et al** EXTORTED Appellant's property and ALL **Appellees** have willfully **DEFRAUDED** the courts since then because Appellant's Brief or the Concise Statement appended to said Brief are very clear **Appellee UAW et al** is a fraud at Appellee AK Steel plant in Butler PA because **Appellee AK Steel et al** provides an on property Appellee UAW et al union hall and pays the salaries of the officers as well which is a violation of **National Labor Relations Act (NLRB) Section 8 (a)(2)** **and** makes it an unfair labor practice for an employer:

...to **dominate or interfere** with the formation or administration of any labor organization **or contribute financial or other support to it.**" (emphasis added)

Appellees fail to respond to the legal issue of **FRAUD** committed by **Appellee AK Steel et al** as well as **Appellee UAW et al** spelled out very clearly again in Appellant's Brief and the Concise Statement appended to the said Brief.

WRIT OF MANDAMUS

Appellant Myers files this Writ of Mandamus as there has been the final Order dated 11-21-20 and the Supreme Court of Pennsylvania must demand that Appellee Cunningham is removed as a judge since he is an Appellee and that Appellee Cunningham is reported to the Disciplinary Board of the Supreme Court of Pennsylvania to have his law license revoked for his blatant violation of not honoring his sworn oath to uphold the Constitution of the United States of America and his sworn oath of office as an attorney and his part in the conspiracy against Appellant.

The Supreme Court of Pennsylvania must report Appellee McCune to the Disciplinary Board of the Supreme Court of Pennsylvania to have his law license revoked for his blatant violation of not honoring his sworn oath to uphold the Constitution of the United States of America and his sworn oath of office as an attorney and his part in the conspiracy

against Appellant. Specifically for not investigating the criminal act committed by Appellee AK Steel when the truck rolled over with Appellant inside the truck even after Appellant sent Appellee McCune a detailed letter (**Exhibit 28 from Appellant's Brief**) of the criminal activity while Appellee McCune was the Butler County District Attorney.

The Supreme Court of Pennsylvania must report ALL other Appellees with a law license to the Disciplinary Board of the Supreme Court of Pennsylvania to have their law license revoked for their blatant violation of not honoring their sworn oath to uphold the Constitution of the United States of America and their sworn oath of office as attorneys and their part in the conspiracy against Appellant.

The Supreme Court of Pennsylvania must demand that the current Butler County District Attorney Richard Goldinger investigate the criminal activity against Appellant by ALL Appellees and the continued unsafe use of grossly overloaded

tractor-trailers with UNSECURED loads traveling the extremely steep hill with an approximate 45 degree bend in the hill at the Appellee AK Steel plant in Butler Pennsylvania that allows the public and vendors to travel the on the same Appellee AK Steel roads. Appellant notified Goldinger on 8-12-19 via a time/date stamped email (**Exhibit - Investigation and prosecution – from Appellant’s Brief**). If Goldinger does not honor his sworn oaths then the court must mandate his investigation and prosecution and forward the investigation of Appellant’s case to the Pennsylvania Attorney General Josh Shapiro If Shapiro does not honor his sworn oaths then the court must mandate his investigation and prosecution and forward the investigation of Appellant’s case to U.S. Attorney General Barr.

EXTRAORDINARY JURISDICTION

In light of the evidence in the **Appellant's Brief** and the **Writ of Mandamus** this case must be transferred back to the Supreme Court of Pennsylvania. Appellant has proven through the Constitution of the United States of America, Title 42 and the Pennsylvania Constitution and because ALL Appellees have violated **Title 18 Section 241 Conspiracy Against Rights, Section 242 Deprivation of Rights Under Color of Law and Section 245 Federally Protected Activities** by conspiring against Appellant's Rights that only the Supreme Court of Pennsylvania has jurisdiction.

Additionally, this case must also be transferred to the Supreme Court of Pennsylvania for the violation of Appellant's Constitutional Inalienable/Unalienable RIGHTS and only the Supreme Court of Pennsylvania can demand a full investigation regarding the conspiracy of ALL Appellees against Appellant but specifically the Appellees with a law license.

The Supreme Court of Pennsylvania only has the jurisdiction to enforce an injunction against Appellee AK Steel to have a full investigation of the CIVIL and CRIMINAL ACTS and CONSPIRACY that Appellee AK Steel has perpetrated against Appellant and the fraud between Appellee AK Steel et al and the fraudulent Appellee UAW et al.

When Appellee AK Steel provides Appellee UAW a union hall on AK Steel property as well as pays the salaries and overtime that the fraudulent Appellee UAW officers do not have to work for and then defrauds the court when Appellees AK Steel and fraudulent UAW have the civil case of Appellant in 2004 transferred to Federal Court claiming it is an NLRB case the Supreme Court of Pennsylvania must investigate and call for the prosecution of ALL Appellees involved in this continued fraud against Appellant.

CONCLUSION

"We the people of the United States, in order to form a more perfect union, establish justice, insure domestic tranquility, provide for the common defense, promote the general welfare, and secure the blessings of liberty to ourselves and our posterity, do ordain and establish this Constitution for the United States of America." – **Preamble to the Constitution of the United States of America**

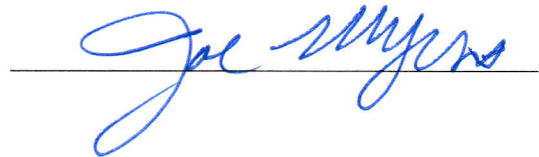
All courts are mandated to follow the SUPREME LAW of the land which is the Constitution of the United States of America and hold the **LAW as ORGANIZED JUSTICE**, in Bastiat's words from the book, THE LAW, referenced in the Appellant's Brief. Courts cannot allow **UNCONSTITUTIONAL LAW** to continue as **ORGANIZED CRIME** and allow Appellant to be illegally plundered!

Appellant is seeking \$100 million from Appellee AK Steel and \$10 million from EACH other Appellee in compensatory and punitive damages for the conspiracy.

The entirety of this writ should issue and the full weight of the Constitution must be followed to the prosecution of ALL Appellees and the compensatory and punitive damages restored to Appellant.

This Court has only one duty and that is to follow the United States Constitution and STRIKE the recent ORDERS dated May 26th and 27th of 2020 and execute the attached ORDER.

Dated this 8th day of June, 2020



Joe Myers pro se

12137 Emerald Green Court

Jacksonville, FL 32246

Phone: 904-254-6472

Email: 1776ToTyranny@gmail.com

CERTIFICATE OF COMPLIANCE

I hereby certify that filing complies with the requirements of the Court to the best of my ability as a Citizen of the United States.

Dated this 8th day of June, 2020

/s/ Joe Myers

Joe Myers pro se

12137 Emerald Green Court

Jacksonville, FL 32246

Phone: 904-254-6472

Email: 1776ToTyranny@gmail.com

IN THE SUPERIOR COURT OF PENNSYLVANIA WESTERN DISTRICT

Superior Court Docket No. 1892 WDA 2019

Joe Myers

APPELLANT

vs.

Timothy F. McCune, Joseph H. Chivers, John/Jack W. Murtagh Jr., Graydon Brewer, Carl V. Nanni, Jack Lewis, Jim Gallagher, Hank Leyland, Greg Loverick, Edward Tasse, AK Steel et al, UAW et al (formerly Butler Armco Independent Union), Angelo Papa, William Cunningham, Michael Lettrich, Maria Milie Jones, Dennis Roman, Nicholas Koch, Adam Hobaugh,

APPELLEES

ORDER

AND NOW, this _____ day of June 2020, upon the facts and evidence provide by Appellant, it is hereby ORDERED by the Superior Court that:

- (a) The recent ORDERS dated May 26th and 27th of 2020 are hereby STRIKEN from the record as well as ALL Briefs filed by Appellees as the Appellees perverted the LAW and did not honor their sworn oath to the Constitution;

- (b) Appellant is awarded either the full damages requested or a JURY TRIAL is scheduled;
- (c) That part of this case to be transferred BACK to the Supreme Court of Pennsylvania so that ALL Appellees with a law license are stripped of their license and NEVER allowed to practice law in the United States;
- (d) That part of this case to be transferred back to the Supreme Court of Pennsylvania so an injunction is imposed on Appellee AK Steel et al Butler plant for the continued criminal activity of hauling the coils on grossly overloaded trailers coming down a steep hill with a 90 degree bend in it to an intersection Appellee AK Steel et al allows the public at large to enter their property to purchase material from Hocketts Slag a public company;
- (e) That part of this case to be transferred back Supreme Court of Pennsylvania so the Court can contact Cleveland-Cliffs the new owner of Appellee AK Steel et al to inform them of this legal issue.

BY THE COURT

_____J.

**IN THE COURT OF COMMON PLEAS
BUTLER COUNTY, PENNSYLVANIA**

JOE MYERS,)	Case No.: No. 19-10516
)	
Plaintiff,)	CIVIL DIVISION
)	
vs.)	
)	Type of Pleading:
TIMOTHY F. McCUNE, JOSEPH H. CHIVERS, JACK)	
W. MURTAUGH JR., GRAYDON BREWER, CARL V.)	PRAECIPE of NOTICE to add DEFENDENT PAPA'S
)	name to COMPLAINT and all PLEADINGS
NANNI, JACK LEWIS, JIM GALLAGHER, HANK)	
LEYLAND, GREG LOVERICK, EDWARD TASSEY, AK)	PRAECIPE of NOTICE OF IGNORING THE
)	COMPLAINT by certain DEFENDANTS
STEEL et al, UAW (formerly Butler Armco)	
Independent Union) et al, ANGELO PAPA)	FILED BY:
)	
Defendants)	Joe Myers, pro se
)	12137 Emerald Green Court
)	Jacksonville, FL 32246

Defendant Papa's name was mistakenly missing from heading of Plaintiff's Complaint and all subsequent pleadings even though he was referenced in said documents so this is to notify the court that Defendant Papa has been added in the heading. Attached is the email dated 7-27-19 from Plaintiff to Defendant Papa apprising Papa of the Complaint filed by Plaintiff.

This is also to notify the court that Defendants Murtagh, Papa, Brewer, Nanni, Lewis, Gallagher, Leyland, Loverick and UAW (formerly Butler Armco Independent Union) have refused to respond to the Complaint that Plaintiff sent to all Defendants via United States Priority Mail. Tracking confirms ALL Defendants received the Complaint and all other pleadings have been mailed **U.S. Mail, First-Class.**

Defendant Murtagh has refused the numerous mailings that Plaintiff has sent to numerous addresses and Murtagh's law firm of Murtagh, Hobaugh & Cech in Butler PA and Wexford PA and his P.O. Box. Provided are the exhibits of the letters and dates Plaintiff mailed letters to Defendant Murtagh that have the return dates to Plaintiff.

Plaintiff has provided the emails dated 7-15-19 and 7-24-19 to and from Plaintiff and Adam Hobaugh, attorney at the law firm of Murtagh, Hobaugh & Cech, as well as to the email address JWMurtagh@MHCLawfirm.com which is still active as the date of this pleading for Jack Murtagh. Plaintiff details in the email to Hobaugh and Murtagh that Murtagh continues to represent individuals per the profile of Murtagh on the website of Murtagh, Hobaugh & Cech at <http://mhclawfirm.com/attorney-employment/> (see attached exhibits that Plaintiff emailed with a time date stamp).

Hobaugh had a legal duty as an attorney to make sure Defendant Murtagh received the legal documents when the website of Murtagh, Hobaugh & Cech states Murtagh is still an attorney at the law firm with both locations at 110 Swinderman Road in Wexford and 112 Hollywood Drive Suite 101 in Butler the same address as Defendant UAW.

The court must bring sanctions against Adam Hobaugh and the law firm of Murtagh, Hobaugh & Cech for obstructing justice.

All other Defendants have been notified by Plaintiff of ALL PLEADINGS via U.S. Mail and the pleadings can be downloaded at www.1776ToTyranny.com and Defendants are responsible for not responding and cannot claim ignorance.

Dated this 7th day of August, 2019



Joe Myers pro se
12137 Emerald Green Court
Jacksonville, FL 32246
Phone: 904-254-6472
Email: joemyers7@icloud.com

**IN THE COURT OF COMMON PLEAS
BUTLER COUNTY, PENNSYLVANIA**

JOE MYERS,)	Case No.: No. 19-10516
)	
Plaintiff,)	CIVIL DIVISION
)	
vs.)	
)	
TIMOTHY F. McCUNE, JOSEPH H. CHIVERS, JACK)	
W. MURTAUGH JR., GRAYDON BREWER, CARL V.)	
NANNI, JACK LEWIS, JIM GALLAGHER, HANK)	
LEYLAND, GREG LOVERICK, EDWARD TASSEY, AK)	
STEEL et al, UAW (formerly Butler Armco)	
Independent Union) et al, ANGELO PAPA)	
Defendants)	
)	
)	

ORDER

AND NOW, to-wit, this _____ day of _____, 2019, upon consideration of Plaintiff's Complaint and ALL pleadings of Plaintiff it is hereby ORDERED that Plaintiff has a Constitutional Right to be heard by a jury of Plaintiff's peers. It is ADJUDGED and DECREED that Jury selection will be set for this _____ day of _____, 2019 JURY TRIAL will commence this _____ day of _____, 2019.

BY THE COURT

CERTIFICATE OF SERVICE

I, the undersigned, certify that the foregoing PLAINTIFF'S RESPONSE THE DEFENDANT CHIVERS NOTICE OF INTENT TO ENTER JUDGEMENT OF NON PROS was served on the following via U.S. Mail, First-Class, this 7th day of August, 2019.

Marie Milie Jones/Michael Lettrich counsel for Timothy F. McCune

Gulf Tower
Suite 3410
707 Grant Street
Pittsburgh, PA 15219

Dennis Roman counsel for Joseph Chivers

Union Trust Building
Suite 700
510 Grant Street
Pittsburgh, PA 15219

Jack W. Murtagh

110 Swinderman Road
Wexford, PA 15090

Graydon Brewer

48 Crystal Drive
Oakmont, PA 15139

Angelo Papa

318 Highland Ave
New Castle, PA 16101

Carl Nanni

200 E. Pearl Street

Butler PA 16001

Jack Lewis

870 Bullcreek Road

Butler, PA 16002

Jim Gallagher

200 Portman Road

Butler, PA 16002

Hank Leyland

188 Portman Road

Butler, PA 16002

Greg Loverick

100 Easy Street

Butler, PA 16001

Nicholas J. Koch counsel for Defendants AK Steel et al and Tasse

Union Trust Building

501 Grant Street, Suite 800

Pittsburgh, PA 15219

UNITED AUTO WORKERS - UAW (formerly Butler Armco Independent Union) and Jack Murtagh

Union Counsel

112 Hollywood Dr., Suite 101

BUTLER, PA 16001



Joe Myers
5

Complaint information

July 27, 2019 at 1:30 PM

From Joe Myers

To Angelo Papa

Angelo,

Since you have not responded to the Complaint I filed I wanted to share the website that you can download the Complaint and all the pleadings to date.

<https://www.1776totyranny.com>

Joe

CERTIFICATE OF SERVICE

I, the undersigned, certify that the foregoing **APPELLANT'S DEMUR OF RECENT ORDERS** was served on the following via U.S. Mail, First-Class, this 8th day of June, 2020.

**Erie County Courthouse
Att: William Cunningham
140 West 6th Street
Erie, PA 16501**

**Frost Brown Todd LLC
Union Trust Building / Att: Nicholas J. Koch
501 Grant Street, Suite 800
Pittsburgh, PA 15219**

**JonesPassodelis PLLC
Gulf Tower /Att: Ms. Jones & Mr. Letterich
707 Grant Street, Suite 3410
Pittsburgh, PA 15219**

**Angelo Papa
318 Highland Ave
New Castle, PA 16101**

**Graydon Brewer
48 Crystal Drive
Oakmont, PA 15139-1051**

**Murtagh, Hobaugh & Cech
Att: Adam Hobaugh
P.O. Box 816
Wexford, PA 15090**

**Marshall Dennehey Warner Coleman & Goggin
Union Trust Building / Att: Dennis Roman
501 Grant Street, Suite 700
Pittsburgh, PA 15219**



Joe Myers