IN THE SUPERIOR COURT OF PENNSYLVANIA SITTING AT PITTSBURGH

JOSEPH MEYERS, Appellant

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.UAW. et al., Appellees

NO. 1892 WD 2019

APPELLEES' BRIEF AND PETITION FOR JOINDER OF ARGUMENT

ON BEHALF OF:UAW LOCAL 3303,
JAMES C. GALLAGHER, HANK LEYLAND, JOHN MURTAGH JR.,
GREG LOVERICK, CARL NANNI, AND JACK LEWIS

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APPELLEES'S BRIEF AND PETITION FOR JOINDER OF ARGUMENT

COMES NOW, the Appellees, UAW LOCAL 3303,

JAMES C. GALLAGHER, HANK LEYLAND, JOHN MURTAGH JR.,

GREG LOVERICK, CARL NANNI, AND JACK LEWIS, by and through their attorney, Adam K. Hobaugh, Esquire, and submits this

Petition for Joinder of Argument as follows:

To preserve judicial resources and prevent duplication of argument on the exact same issues and defenses to Appellant's Appeal, the parties herein submit a request to join in the defenses and arguments raised by Appellees AK Steel and Edward Tassey.

Counsel for Appellees UAW LOCAL 3303,

JAMES C. GALLAGHER, HANK LEYLAND, JOHN MURTAGH JR.,

GREG LOVERICK, CARL NANNI, AND JACK LEWIS, joins in the
response filed by Appellees AK Steel and Edward Tassey, on May
21, 2020.

Respectfully submitted, MURTAGH, HOBAUGH, & CECH

s/Adam K. Hobaugh Adam K. Hobaugh PA ID No. 203448 Murtagh, Hobaugh & Cech P.O. BOX 816 Wexford, PA 15090 Telephone: (724) 935-7555

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Attorney for UAW Local 3303, James C. Gallagher, Hank Leyland, John Murtagh Jr., Greg Loverick, Carl Nanni, and Jack Lewis

CERTIFICATION OF COMPLIANCE

I hereby certify that the foregoing Brief contains 118 words according to the word processing system used to prepare the Brief. This complies with Pa.R.A.P. 2135(a)(2).

Respectfully submitted,
MURTAGH, HOBAUGH, & CECH

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CERTIFICATE OF SERVICE

I, the undersigned certify that the foregoing APPELLEES UAW LOCAL 3303, JAMES C. GALLAGHER, HANK LEYLAND, JOHN MURTAGH JR., GREG LOVERICK, CARL NANNI, AND JACK LEWIS' APPELLES' BRIEF AND PETITION FOR JOINDER was served on the following via U.S. Mail, First-Class, postage prepaid, this <u>21st</u> day of MAY, 2020.

Mr. Joe Myers 12137 Emerald Green Court Jacksonville FL 32246 Angelo Papa, Esq. 318 Highland Avenue New Castle, PA 16101

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Joseph Chivers c/o Dennis J. Roman, Esq. Marshall Dennehey, Warner, Coleman, & Goggin, P.C. Union Trust Building 501 Grant Street, Suite 700 Pittsburgh, PA 15219 AK Steel Corporation and Edward Tassey c/o Nicholas J. Koch, Esq. Frost Brown Todd, LLC Union Trust Building 501 Grant Street, Suite 800 Pittsburgh, PA 15219

Hon. William Cunningham 1020 Perry Highway Pittsburgh, PA 15237

> /s/Adam K. Hobaugh Adam K. Hobaugh

CERTIFICATE OF COMPLIANCE

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

Respectfully submitted,
MURTAGH, HOBAUGH, & CECH

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