

IN THE COURT OF COMMON PLEAS, BUTLER COUNTY, PENNSYLVANIA

JOE MYERS : CIVIL DIVISION
: :
vs. : NO. 19-10516
: :
TIMOTHY F. MCCUNE, JOSEPH CHIVERS, :
JACK W. MURTAUGH JR., GRAYDON :
BREWER, CARL V. NANNI, JACK LEWIS, JIM :
GALLAGHER, HANK LEYLAND, GREG :
LOVERICK, EDWARD TASSEY, AK STEEL et.al.

TYPE OF PLEADING:
LIMITED SPECIAL APPEARANCE
PRELIMINARY OBJECTIONS
10/18/19

FILED ON BEHALF OF:
ANGELO PAPA

COUNSEL FOR THIS PARTY:

Angelo A. Papa, Esquire
Supreme Court #47049
318 Highland Avenue
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(724) 654-8111
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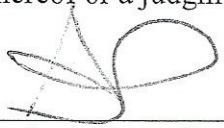
CERTIFICATE OF COMPLIANCE

I 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.

NOTICE TO PLEAD

TO: *Timothy F. McCune, Joseph Chivers, Jack W. Murtaugh Jr., Graydon Brewer, Carl V. Nanni, Jack Lewis, Jim Gallagher, Hank Leyland, Greg Loverick,*
You are hereby notified to file a written response to the enclosed within twenty (20) days from service hereof or a judgment may be entered against you.

*Edward Tassej,
Ak Steel, et al.*



Angelo A. Papa, Esquire

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PRELIMINARY OBJECTIONS /LIMITED /SPECIAL APPEARANCE

AND NOW comes the Plaintiff, Joe Myers, by and through his attorney, Angelo A. Papa, Esquire, and avers as follows:

1. The Plaintiff hereby incorporates by reference all documents and paragraphs of all prior pleadings as filed at this number and Joe Myers V Signature Hill 2007 – 11305 Butler County as though fully set forth herein.

2. The defendant herein, appear specially, without waiving any personal and subject matter jurisdictional claims whatsoever, and urges as a first matter, that he is not a defendant, is not subject to personal, and not subject to the subject matter jurisdiction of the plaintiff's claims, which are incomprehensible.

3. Although it is impossible to raise a defense, and although the defendant urges that there is no personal or subject matter jurisdiction, he does not want to "chance" the possibility that somehow the plaintiff, the Prothonotary, or the court would somehow, in some way issue some type of a default decision, ruling, order, which would in some way and somehow be against this

defendant, interests.

4. Years ago this plaintiff raised claims, which were dismissed, at least in part, because this plaintiff, could not get a certificate of merit.

5. This defendant, in this action, in no way yields that he is a part of this case, notwithstanding the claims, that the plaintiff has indicated, that this defendant is somehow a defendant.

6. Years later, this plaintiff raised claims again, different claims against different defendants, never including this particular defendant, all of which this defendant now incorporates pleadings of all defendants, as though fully set forth, including the lack of thicket of merit.

7. This alleged, defendant, has never been properly noticed, served, or otherwise included in this lawsuit, depriving the plaintiff of personal or subject matter jurisdiction.

8. This alleged, defendant, even if later determined to be a defendant, incorporates the preliminary objections of codefendants, and adds, that this case was dismissed, for among other reasons, the fact that the plaintiff never obtained a certificate of merit, and has still not obtained a certificate of merit.

9. This defendant preserved and reserved the right to file any other responsive pleading, to be dismissed from this case for one of personal and subject matter jurisdiction, and reserves the right to file other preliminary objections, if the court would somehow rule that this alleged, defendant, is a proper defendant.

10. This alleged, defendant, reserves and reserves the right to file a motion for sanctions, against this plaintiff, for vexatious, frivolous, vindictive claims, and abuse of process, seeking compensatory damages in excess of \$250,000,

WHEREFORE, Plaintiff respectfully requests that this Honorable Court dismiss any and all claims against this alleged, defendant.

Respectfully submitted,

A handwritten signature in black ink, consisting of several overlapping loops and curves, characteristic of a cursive or stylized signature.

Angelo A. Papa, Esquire

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NOTICE OF PRESENTMENT

Joe Myers
12137 Emerald Green Court
Jacksonville, FL 32246

Kindly take note that the Attached Pleading will be presented to the Prothonotary on the
18 day of October 2019.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below, a true and correct copy
of the Pleading was served upon counsel at the address indicated above.

Date: _____

10/18/19