



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](mailto: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](http://www.1776ToTyranny.com) and Defendants are responsible for not responding and cannot claim ignorance.

Dated this 7<sup>th</sup> day of August, 2019



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**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	)	
	)	

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**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.

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**BY THE COURT**

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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 7<sup>th</sup> 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

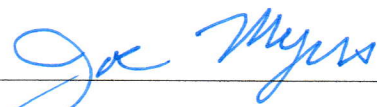
Pittsburgh, PA 15219

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

Union Counsel

112 Hollywood Dr., Suite 101

BUTLER, PA 16001

  
\_\_\_\_\_  
Joe Myers  
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