IN THE COURT OF COMMON PLEAS BUTLER COUNTY, PENNSYVANIA

)	Case No.: No. 19-10516
JOE MYERS,)	
)	CIVIL DIVISION
Plaintiff,)	
)	
VS.)	
)	Type of Pleading:
TIMOTHY F. McCUNE, JOSEPH H. CHIVERS, JACH	K)	
)	PRAECIPE of NOTICE to add DEFENDENT PAPA'S
W. MURTAUGH JR., GRAYDON BREWER, CARL V.)	name to COMPLAINT and all PLEADINGS
)	
NANNI, JACK LEWIS, JIM GALLAGHER, HANK)	PRAECIPE of NOTICE OF IGNORING THE
)	COMPLAINT by certain DEFEDNANTS
LEYLAND, GREG LOVERICK, EDWARD TASSEY, AK)	
)	
STEEL et al, UAW (formerly Butler Armco)	
)	
Independent Union) et al, ANGELO PAPA)	FILED BY:
)	
Defendants)	Joe Myers, pro se
)	12137 Emerald Green Court
1	1	Tacksonville 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 <u>JWMurtagh@MHClawfirm.com</u> which is still active as the date if 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 <u>http://mhclawfirm.com/attorney-employment/</u> (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 <u>www.1776ToTyranny.com</u> and Defendants are responsible for not responding and cannot claim ignorance.

Dated this 7th day of August, 2019

Muss

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, PENNSYVANIA

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)	
)	
OR	DER	
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 Jur	y 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 JUDGEMNENT 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 Tassey

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 Myrs

Joe Myers