



COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA

MICHAEL MARTIN

vs.

TULLYTOWN BOROUGH

NO. 2024-00693

CIVIL COVER SHEET

State Rule 205.5 requires this form be attached to any document commencing an action in the Bucks County Court of Common Pleas. The information provided herein is used solely as an aid in tracking cases in the court system. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Name of Plaintiff/Appellant's Attorney: Scott M. Pollins, Esq., ID: 76334

Self-Represented (Pro Se) Litigant

Class Action Suit Yes No

MDJ Appeal Yes No

Money Damages Requested

Commencement of Action:

Complaint

Amount in Controversy:

More than \$50,000

Case Type and Code

Contract:

Employment Dispute: Other

Other: _____

Case# 2024-00693-0 - JUDGE:45 Received at County of Bucks Prothonotary on 02/02/2024 11:22 AM. Fee = \$283.25. The filer certifies 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. E-Filed by: Scott M. Pollins, Esq.

Pollins Law

Attorney for Plaintiff

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|---------------------------|---|-----------------------|
| <hr/> | : | Bucks County, PA |
| MICHAEL MARTIN, | : | Court of Common Pleas |
| Plaintiff, | : | |
| v. | : | |
| TULLYTOWN BOROUGH, | : | Civil Action No. |
| Defendant. | : | |
| <hr/> | : | |

NOTICE TO DEFEND - CIVIL

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Bucks County Bar Association
135 East State Street, P.O. Box 300
Doylestown, PA 18901
(215) 348-9413 or 1-(800)-273-2929

Case# 2024-00693-0 - JUDGE:45 Received at County of Bucks Prothonotary on 02/02/2024 11:22 AM. Fee = \$283.25. The filer certifies 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. E-Filed by: Scott M. Pollins, Esq.

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| | | |
|---------------------------|---|-----------------------|
| <u>MICHAEL MARTIN,</u> | : | Bucks County, PA |
| Plaintiff, | : | Court of Common Pleas |
| v. | : | |
| <u>TULLYTOWN BOROUGH,</u> | : | Civil Action No. |
| Defendant. | : | Jury Trial Demanded |

COMPLAINT

1. Plaintiff, Michael Martin (Martin), is the former Chief of Police for Defendant, Tullytown Borough (Borough). Martin is suing Borough for terminating his employment in retaliation for him blowing the whistle about dangerous understaffing of police and refusing Borough’s directions to violate the law. Martin brings his legal claims under the Pa. Whistleblower Law (PaWBL), 43 P.S. Sections 1421-1428, and for public policy wrongful discharge.

2. Martin resides in Bucks County, PA.

3. Borough is a Pennsylvania municipal entity located at 500 Main Street, Tullytown, PA 19007.

4. Borough has a Council comprised of seven (7) members.

5. Borough Council is responsible for creating and adopting all ordinances and policies necessary for town government to operate. It also establishes appropriate boards, commissions, and committees and makes the appropriate appointments.

6. Borough’s Mayor is responsible for the police department and its personnel.

7. In May 2023, Borough hired Martin to be the Chief of Police.

8. Borough's Chief of Police is appointed by Borough Council and reports to the Mayor. The Chief of Police is responsible for enforcing local, state and federal laws and handles the administration of the police department.

9. On May 4, 2023, Borough and Martin entered into an Employment Contract (Agreement, attached as *Exhibit I*), which stated, in pertinent part:

- The term of the Agreement was May 4, 2023 through December 31, 2024 (Section I-A, pg. 1).
- Martin was subject to a 6-month probationary period, and his employment became permanent unless Borough Council notified Martin in writing prior to the 6 months probationary period ending that a permanent appointment would not be made, or Martin was dismissed for cause (Section I-C, pg. 1).
- Martin was required to provide Borough Council and Borough's Mayor with monthly reports regarding the financial operations of the police department (Section V, pg. 3).
- Martin was required to submit requests for hiring of additional police officers to Borough Council (Section V, pgs. 3-4).
- No elected official of the Borough (including any Council members), unless acting for the entire elected body, was permitted to contact Martin or any police employee under his command in an attempt to compromise any police department rule or regulation, established law, or Borough ordinance (Section X, pg. 5).

10. During Martin's employment at Borough, Borough had a collective bargaining agreement (CBA) with the Borough Police Benevolent Association. The CBA is attached to Martin's Agreement as Exhibit B.

11. The CBA stated, in pertinent part:

- No Borough police officer shall be disciplined or discharged without just cause (Section XXVIII, pg. 12 of CBA).
- Safe working conditions shall be maintained (Section XXXII-A, pg. 13).

- Borough shall maintain a minimum of two police officers for patrol duty on a patrol shift at all times, not including Martin as the Chief of Police (Section XXXII-B, pg. 14).

12. Throughout Martin's employment at Borough, Martin prepared monthly reports, which were provided to Borough's Council and Mayor. Martin's monthly reports were available to the community. His monthly reports could be obtained by anyone who submitted a Right to Know request to Borough.

13. In Martin's June 2023 Monthly Report, he stated that the police department is short by two full time officers to fill the schedule. Martin asked Borough Council to start the process to get approval for two positions to get the police department up to full strength. Martin stated that once the police department is at full staff, overtime expenditures will be greatly reduced.

14. On June 6, 2023, Martin attended a meeting of the Borough Council personnel committee conducted at the house of Borough Council member Bryan Servis (Servis). Also in attendance at this meeting were Borough Council members Scott Saunders (Saunders) and Joe Shellenberger (Shellenberger).

15. During this meeting, the Borough Council personnel committee told Martin they wanted Officer Dilanni gone. Martin told them he had no reason to terminate Officer Dilanni. Servis told Martin to take away Officer Dilanni's firearm. Martin said he could not do that. All three claimed that because Dilanni is injured he should not carry a firearm. Martin told them that Officer Dilanni had a doctor's note allowing him to work light duty. They asked to see Officer Dilanni's doctor's note. Martin told them he cannot do that as it would be a HIPAA violation.

16. In Martin's July 2023 Monthly Report, he requested that Borough approve the hiring of at least one more full-time police officer (Full Time Police Officer Junior Rivas Breton had just been hired by Borough). Martin stated that he wanted to establish an eligibility list for police officers, which Borough was required to do pursuant to 8 Pa.C.S. Section 1184. Martin explained that Borough currently employed several good part time officers who want to work full time, however because Borough did not maintain an eligibility list, Martin was concerned the part time officers would leave working for the Borough and go work somewhere else full time. Martin stated that he wanted to end the Borough's revolving door of losing quality officers to other departments and give part time officers an opportunity, through the establishment of an eligibility list (which the Borough was legally required to establish but had not done so) to become full time officers. Martin stated that even with the recent hiring of Officer Breton, the police department was still short two full time officers, and the department was about to lose a part time officer who was working about 55 hours/week.

17. On July 7, 2023, Martin attended another meeting of the Borough Council personnel committee. This meeting was conducted at the house of Borough Council member Saunders. Borough Council members Servis and Shellenberger were also in attendance at this meeting.

18. Martin's purpose in attending this meeting was to request a vote be taken at the upcoming Borough Council meeting to approve his request for the hiring of at least one full-time police officer.

19. Martin explained that the Borough is needlessly spending a lot of money on overtime because of the police officer shortage. Martin said that his officers are worn out

physically and mentally because they are working so many extra hours. Martin stated the Borough requires at least two officers per shift at all times. Martin said it was urgent that the Borough create a police eligibility list (which the Borough was legally required to do).

20. The Borough Council members told Martin that the Borough was not budgeted for another police officer this year, however Martin showed them the police budget, which showed they *were* budgeted to make such a hire.

21. Martin reiterated how dangerous it is for the community to have such an understaffed police department.

22. Martin also reminded the Borough Council members that the CBA required they have at least two police officers on duty at all times. Martin told them that if they violate the CBA and someone is hurt or killed that it could cost the Borough millions of dollars in lawsuits.

23. Servis told Martin he wanted Officer Dilanni terminated. Servis blurted out that Officer Dilanni had investigated (Servis' friend) Borough Fire Marshall Dave Pearl (Pearl).

24. Servis telling Martin to terminate Office Dilanni because he investigated Pearl violated 18 Pa.C.S.A. Section 4703 (retaliation for past official act).

25. The Borough Council members asked to see Officer Dilanni's doctor's note (just as they had done a month earlier). The Borough Council members also told Martin they wanted him to confiscate Officer Dilanni's firearm (just as they had done a month earlier).

26. Several days later, Martin spoke with Borough Solicitor Russell Sacco (Sacco) about what had happened at the July 7 meeting. Sacco informed Martin that providing the Borough Council members with Officer Dilanni's doctor's note would violate HIPAA.

27. At the July 12, 2023 Borough Council meeting, Borough Council Members Service, Saunders and Shellenberger wrongly stated the Borough did not have the money to hire a full-time police officer. Martin was at the meeting, and he publicly stated that the Borough did have the money to make such a hire. Martin further stated that it was irresponsible for the Borough to not have a police eligibility list for hiring at such a small police department as Borough's. Martin informed everyone in attendance (by person and by video feed) at the meeting that the police department is short-staffed by two full-time officers and that's forcing him to mandate overtime. Martin referenced the danger of a short-staffed police department and how important public safety is.

28. Several weeks later and on about July 31, 2023, Officer Junior Rivas Breton resigned after working at the Borough for less than two months. Officer Breton submitted a letter to Borough Council (*Exhibit 2*) stating that he did not feel secure at the Borough because of the Borough's refusal to properly staff the police department. Officer Breton further stated that he had to work about 70 hours/week just to keep the police department staffed at the minimally required level of two officers per shift.

29. In Martin's August 2023 Monthly Report, he stated that he had received a resignation notice (from Officer Breton) for one of their full-time officers. Martin stated he warned Borough Council at the last council meeting that they need an eligibility list (which the Borough was legally required to maintain but had not done so) to protect the

police department from unexpected losses. Martin stated his department was dangerously short of manpower. Martin requested that the Borough Council approve his recommended hiring of two part-time police officers.

30. At a Borough Council meeting on August 2, 2023, Katie Wallace, wife of Borough police officer Ed Wallace, accused Martin of talking about each and every one of the employees/staff to others in a negative manner.

31. Mrs. Wallace and her husband, Office Wallace, knew this was not true when Mrs. Wallace said this to everyone in attendance at the Borough Council meeting.

32. At the same August 2 Borough Council meeting, the Mayor gave his report. The Mayor stated that Martin was doing an outstanding job and had several accomplishments in the short period he's been the Chief of Police.

33. After the August 2 Borough Council meeting, Servis told one of the Borough's police officers that he would do away with Martin's Chief of Police position and hire a public safety director.

34. In Martin's September 2023 Monthly Report, Martin stated that the loss of a full-time officer (Officer Breton) should be addressed immediately, as the police department is grossly understaffed. Martin requested Borough Council go into executive session to discuss the dangerous understaffing of the police department, and the Borough Council refused. The Borough Council informed Martin they would table this urgent issue for another day, but they never followed up with Martin about the dangerous understaffing of the police department.

35. On September 18, 2023, Martin submitted a written whistleblower complaint to the Borough Council, Mayor and Solicitor (*Exhibit 3*).

36. Martin's whistleblower complaint included the following:

- a. Since Martin started as Chief of Police for the Borough in May 2023, Borough Council has repeatedly conducted official Borough business outside official meetings, and Martin believed this violated Pa.'s Sunshine Act.
- b. Borough Council member Servis told Martin to terminate part-time officer Michael Dilanni because he was on light duty. Servis claimed the police department did not offer light duty to its officers. Servis also said that Dilanni was receiving workers compensation benefits from another police department, and he should not be allowed to work for Borough because of that. Martin discussed these issues with Borough Solicitor Russell Sacco (Sacco). Sacco confirmed there was no issue regarding Officer Dilanni receiving workers compensation benefits from another police department while working for Borough. Martin confirmed that the police department did have a light duty policy, contrary to what Servis told him.
- c. Servis directed Martin to take Officer Dilanni's service weapon away from him. Martin said he could not do that as he had no reason to do so. Martin informed Servis and several other Borough Council members that Office Dilanni had submitted a doctor's note allowing him to work light duty. Servis and the other Borough Council members demanded that Martin provide them with Officer Dilanni's doctor's note and Martin refused and told them that doing so would violate HIPAA.
- d. Martin believed that Servis and the other Borough Council members were forcing Martin to engage in conduct that not only violated HIPAA, but also potentially violated the Americans with Disabilities Act and Pa. Human Relations Act.
- e. Martin has repeatedly complained about the police department being short staffed, and this is a public safety issue.
- f. Martin recounted what happened at the July 7 Borough Council personnel committee meeting he attended at Borough Council member Saunders' house.

37. In Martin's October 2023 Monthly Report, Martin again raised the understaffing issue. He stated that Borough Council has not addressed this very important issue, nor have they even advised whether they have a plan to do so. Martin explained

that Borough's delay should be a cause for concern for both the police department as well as the citizens of Tullytown Borough.

38. On October 6, 2023, Martin emailed Borough Council President Maryann Gahagan (Gahagan). Martin stated that his request to hire two part-time (not full-time) police officers was taken off the meeting agenda. Martin reminded Gahagan that she had said at the prior Borough Council meeting that the Borough would hire these officers at the next meeting. Martin reiterated to Gahagan that the police department is short staffed, and this is a public safety issue.

39. Also on October 6, Sgt. Andrew Bunda emailed Officers Nate Aldsworth and Ed Wallace asking if they were in favor of filing a grievance against the Borough for violating Section XXXII (Safety and Health) of the CBA due to the extreme short staffing. Sgt. Bunda stated there have been shifts where only one officers is working, and this is unsafe for them as police officers and the community.

40. On October 8, Officer Aldsworth responded to Sgt. Bunda's email. In his email, Officer Aldsworth claims that he and Office Wallace could not vote in favor of the grievance because they believed that the main issue with the police department is supervision and managerial decision making.

41. In response to Martin's September 18 whistleblower complaint, the Borough did not conduct an investigation. Instead, the Borough asked its Special Labor Counsel, attorney Neil Morris (Morris), to respond to Martin's whistleblower complaint.

42. On October 16, 2023, Morris sent a letter to Martin (*Exhibit 4*). Morris wrongly claimed that Martin's whistleblower complaint was an attempt to dress up his personal employment grievances and insubordination as allegedly bogus whistleblower

claims in an end around of his at will probation. Based on this and similar statements, Martin believed that Morris' letter was designed not to investigate and meaningfully respond to Martin's whistleblower complaint but instead to disparage and humiliate him.

43. On November 1, 2023, in advance of the Borough Council's regularly scheduled monthly meeting, Sgt. Bunda submitted a letter to Borough Council and the Mayor (*Exhibit 5*).

44. In his letter, Sgt. Bunda stated that Martin has done an exceptional job as Chief of Police. Sgt. Bunda acknowledged Martin for identifying the dire need for the Borough to hire and replace full-time officer positions. Sgt. Bunda stated that Martin's hiring has increased morale with almost all of the officers in the department. Sgt. Bunda stated that having one officer on duty by themselves is not ensuring the officer's or residents' safety, and it opens up the Borough to a huge liability. Sgt. Bunda stated that the Borough's allegedly impending decision to terminate Martin is a dangerous decision to the Borough's safety.

45. Also on November 1, 2023, Borough Council voted 4-2 to approve a motion by Borough Council member Servis to terminate Martin effective immediately. Servis' motion reflected that Borough Solicitor Sacco approved Servis' motion; however, Borough Solicitor Sacco did not approve Servis' motion and this was crossed out of the final motion.

46. The next day, on November 2, 2023, Borough Police 'Acting Chief' Nate Aldsworth' sent Officer Dilanni home without any instructions regarding when he should return to work. About a month later on December 3, 2023, Borough Police 'Acting Chief'

Aldsworth terminated Officer Dilanni. Upon information and belief, these actions were taken at the direction of Borough Council member Servis.

47. Throughout the first several months of Martin's employment at Borough, Borough Council members Servis, Saunders and Shellenberger repeatedly directed Martin to terminate Borough police officers Joseph Parel, IV and Brianna Cochran.

48. Martin repeatedly told Borough Council members that he had no legitimate basis to terminate either of these officers.

49. Borough Council members never provided Martin with any proper reason(s) to terminate either Officer Parel or Officer Cochran pursuant to 8 Pa.C.S. Section 1190.

50. At the previously mentioned July 7 Borough Council personnel meeting at Borough Council member Saunders' house, Borough Council member Servis stated to Martin – 'just remember something, we hired you'. Then, Borough Council members Servis, Saunders and Shelleberg told Martin that 'we're the ones who can fire you.'

51. Borough is a public body within the meaning of the Pa. Whistleblower Law. 43 P.S. Section 1422. Martin is an employee within the meaning of the Pa. Whistleblower Law. 43 P.S. Section 1422.

52. As described above, Martin is a whistleblower who made repeated good faith reports of conduct he reasonably believed constituted wrongdoing or waste within the meaning of the Pa. Whistleblower Law. 43 P.S. Section 1422.

53. Martin's complaints of wrongdoing included Borough's repeated failure to properly and safely staff Borough's police department, Borough's repeatedly demanding that Martin disclose confidential medical information about Officer Dilanni in violation of HIPAA, the ADA and/or the PaHRA, Borough directing Martin to terminate Officer

Dilanni because he had previously investigated Borough Fire Marshall Pearl in violation of 18 Pa.C.S.A. Section 4703, Borough demanding Martin confiscate Officer Dilanni's firearm without any legitimate basis for doing so, Borough's failure to maintain an eligibility list for hiring police officers pursuant to 8 Pa.C.S. Section 1184, Borough directing and demanding Martin terminate Officers Dilanni, Parel and Cochran without any proper reason and in violation of 8 Pa.C.S. Section 1190, and Borough violating Pa.'s Sunshine Act by conducting official Borough business at secret meetings for which no documentation was made nor was the public ever informed about.

54. Martin's complaints of waste included Borough's conduct or omissions in failing to safely staff the police department, and Borough's failure to maintain an eligibility list for hiring police officers pursuant to 8 Pa.C.S. Section 1184. Borough's conduct or omissions required Martin to schedule police officers to work excessive overtime and needlessly prolong the hiring process for new police officers. This resulted in the Borough paying needless additional wages to officers working excessive overtime instead of hiring additional officers who could have worked those excessive overtime hours at a lesser rate.

55. Martin's complaints related to Borough violating the CBA, HIPAA, the ADA, the PaHRA, 18 Pa.C.S.A. Section 4703 (retaliation for past official action), and 8 Pa.C.S. Sections 1184 (eligibility lists to be maintained for hiring of police officers) and 1190 (borough police officers may only be removed for specified reasons).

Count I – Pa. Whistleblower Law

56. Paragraphs 1-55 are incorporated by reference as if fully set forth herein.

57. The acts, failures to act, practices and policies of Borough set forth above constitute whistleblower discrimination/retaliation in violation of the Pa. Whistleblower Law.

58. Borough violated the Pa. Whistleblower Law by terminating Martin in retaliation for his whistleblower complaints.

59. As a direct and proximate result of Borough's illegal retaliatory conduct, Martin suffered and is suffering damages, including lost compensation and benefits and emotional distress consisting of anxiety, stress, humiliation, career damage and embarrassment.

WHEREFORE, Martin respectfully requests this Court enter judgment in his favor and against Borough for the full amount of his damages in an amount exceeding \$50,000, including lost compensation and benefits, reinstatement of employment, interest, actual damages for emotional and mental stress, anxiety, embarrassment and humiliation, negative tax consequence damages, career damage, attorney's fees and expenses, and such other relief as the Court deems proper.

Count II – Public Policy Wrongful Discharge


60. Paragraphs 1-55 are incorporated by reference as if fully set forth herein.

61. For the first six months of Martin's employment at Borough, Martin was an at will employee.

62. Borough's termination of Martin is a violation of public policy as reflected in HIPAA, the ADA, the PaHRA, 18 Pa.C.S.A. Section 4703 (retaliation for past official action), and 8 Pa.C.S. Sections 1184 (eligibility lists to be maintained for hiring of police officers) and 1190 (borough police officers may only be removed for specified reasons).

VERIFICATION

I, Michael Martin, duly depose and state that I am the Plaintiff. I have read the foregoing Complaint and I state that the facts contained therein are true and correct to the best of my knowledge, information and belief. I make these statements subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.


Michael Martin

Date: 2/2/24

Case# 2024-00693-0 - JUDGE:45 Received at County of Bucks Prothonotary on 02/02/2024 11:22 AM. Fee = \$283.25. The filer certifies 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. E-Filed by: Scott M. Pollins, Esq.

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet



_____ County

| | |
|-----------------------------------|--|
| For Prothonotary Use Only: | |
| Docket No: | |

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

| | |
|--|---|
| Commencement of Action: | |
| <input checked="" type="checkbox"/> Complaint | <input type="checkbox"/> Writ of Summons |
| <input type="checkbox"/> Transfer from Another Jurisdiction | <input type="checkbox"/> Petition |
| | <input type="checkbox"/> Declaration of Taking |
| Lead Plaintiff's Name: Michael Martin | Lead Defendant's Name: Tullytown Borough |
| Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Dollar Amount Requested: <input type="checkbox"/> within arbitration limits (check one) <input checked="" type="checkbox"/> outside arbitration limits |
| Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Name of Plaintiff/Appellant's Attorney: <u>Scott M. Pollins</u> | |
| <input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant) | |

SECTION B

| | | |
|--|--|---|
| <p>Nature of the Case: Place an "X" to the left of the <u>ONE</u> case category that most accurately describes your PRIMARY CASE. If you are making more than one type of claim, check the one that you consider most important.</p> | | |
| <p>TORT (do not include Mass Tort)</p> <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other: _____ _____ | <p>CONTRACT (do not include Judgments)</p> <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other _____ _____ <input type="checkbox"/> Employment Dispute: Discrimination <input checked="" type="checkbox"/> Employment Dispute: Other Pa. Whistleblower Law and Public Policy Wrongful Tern <input type="checkbox"/> Other: _____ _____ | <p>CIVIL APPEALS</p> Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other _____ _____ <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: _____ _____ |
| <p>MASS TORT</p> <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: _____ _____ | <p>REAL PROPERTY</p> <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: _____ _____ | <p>MISCELLANEOUS</p> <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations <input type="checkbox"/> Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: _____ _____ |
| <p>PROFESSIONAL LIABILITY</p> <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____ _____ | | |