



IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

2015 JUL 31 AM 10:15
CENTRE COUNTY, PA
CLERK OF COURT

GRAHAM B. SPANIER

Plaintiff,

v.

LOUIS J. FREEH, and
FREEH SPORKIN & SULLIVAN, LLP,

Defendants.

) Docket No. 2013-2707
)
) Type of Case: Defamation
)
) Type of Pleading: Status Report
)
) Filed on behalf of: Plaintiff
)
) Counsel of record for this party:
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all prior motions and how those motions were resolved by the Court; (III) Pending Motions, a summary of the motions that have been filed by the parties and Plaintiff's proposal for resolving these pending motions to move the litigation forward; and (IV) Other Procedural Issues, other procedural matters that may require the Court's attention.

I. Nature Of The Action.

This is a defamation, tortious interference, and breach of contract action brought by Dr. Graham B. Spanier, the former President of Pennsylvania State University ("Penn State" or "University"), against Louis J. Freeh ("Freeh"), his law firm Freeh Sporkin & Sullivan, LLP ("FSS"), his consulting firm Freeh Group International Solutions, LLC ("FGIS"), and Penn State itself. The lawsuit arises out of false and defamatory statements about Dr. Spanier in the "Freeh Report" commissioned by Penn State, as well as disparaging statements made by certain members of the University's Board of Trustees — as well as other breaches of contract by Penn State — in the wake of the well-publicized events involving Jerry Sandusky.¹

¹ The facts supporting the causes of action against Defendants Freeh and FSS and prospective defendants FGIS and Penn State are set forth in detail in the Proposed Complaint attached as Exhibit 1 to Plaintiff's Motion To Join Additional Parties. The facts stated herein are intended only to summarize the claims alleged in the Proposed Complaint in order to familiarize the Court with the general natures of the allegations and claims.

The defamation claims against Freeh and FSS relate to defamatory statements Defendants made concerning Dr. Spanier in a July 12, 2012 written report entitled “Report of the Special Investigative Task Force Regarding the Actions of the Pennsylvania State University Related to the Child Sexual Abuse Committed By Gerald A. Sandusky” (“Freeh Report”), in a July 12, 2012 press conference held in conjunction with the release of the Freeh Report, in prepared remarks distributed at the press conference, and in a February 2013 press release reiterating the defamatory statements and allegations in the Freeh Report.

The claims against Penn State relate primarily to the same defamatory statements made by Freeh and FSS in the Freeh Report (which Penn State commissioned and published on its website), to statements made by certain Penn State trustees regarding the Freeh Report that spoke negatively and disparagingly about Dr. Spanier in violation of an explicit clause in Dr. Spanier’s November 15, 2011 Separation Agreement with Penn State, and to other breaches of the Separation Agreement by Penn State which also occurred as a result of, and arose directly from, the defamatory statements in the Freeh Report.

The claim against FGIS relates to Freeh’s and FGIS’s actions during Freeh’s engagement by Penn State in tortiously interfering with Dr. Spanier’s employment opportunities.

II. Procedural History

What follows is a chronological, narrative summary of the procedural history of the case to date, including all significant motions and orders. For the Court's convenience, Plaintiff has also attached a chart listing all filings in this action² in the Centre County Court of Common Pleas, the Superior Court, the United States District Court for the Middle District of Pennsylvania, and the United States Court of Appeals for the Third Circuit. See Appendix A.

A. Commencement Of The Action / Initial Stay Of Proceedings

Plaintiff commenced this civil action on July 11, 2013 by filing a Praecipe for a Writ of Summons with the Prothonotary. On August 2, 2013, Plaintiff filed a Praecipe to Reissue Writ of Summons. Plaintiff then served the writs on then-Defendants Freeh, FSS, and Pepper Hamilton LLP. On September 12, 2013, Plaintiff filed a Praecipe to Issue Amended Writ of Summons that dropped Pepper Hamilton LLP as a defendant. On September 30, 2013, Defendants Freeh and FSS filed a Praecipe to File Complaint, requesting that the Prothonotary enter a Rule Upon Plaintiff to File a Complaint. The Rule was granted the same day.

On October 18, 2013, Plaintiff filed a Motion to Stay Civil Proceedings, asking the Court to stay all further proceedings in this civil case until certain

² Certain non-substantive filings, such as notices of appearance and *pro hac vice* motions, have been omitted from this summary and Appendix A for purposes of brevity.

criminal proceedings in the Court of Common Pleas of Dauphin County are resolved. Defendants filed their Opposition on November 12, 2013, arguing that Defendants would be prejudiced by being named in a writ of summons without having the allegations against them detailed in a complaint. The motion was argued on January 7, 2014. On February 25, 2014, Judge Jonathan D. Grine issued an Opinion and Order granting Plaintiff's motion and staying the case.

Defendants filed an Emergency Motion for Reconsideration on March 17, 2014. In their Emergency Motion, Defendants argued for the first time that Defendants could lose their ability to remove the case to federal court if the case remained stayed without a complaint being filed beyond the one-year anniversary of its commencement because, subject to certain exceptions, removal to federal court must be effected within one year under 28 U.S.C. § 1446. On March 18, 2014, Judge Grine denied Defendants' Emergency Motion for Reconsideration.

On March 25, 2014, Defendants Freeh and FSS filed a Notice of Appeal regarding Judge Grine's Order staying the case, and on March 31, 2014, Defendants filed their Concise Statement of Matters Complained of on Appeal. On April 8, 2014, Judge Grine issued a further Opinion in Response to Matters Complained of on Appeal, affirming the reasoning in his February 25, 2014 Opinion and Order and requesting that the decision remain undisturbed.

On March 26, 2014, Freeh and FSS filed an Application for Special Relief in the Superior Court of Pennsylvania, arguing that the Superior Court should hear their appeal on an expedited basis because of the claimed threat to their effort to remove the case to federal court. On April 9, 2014, the Superior Court granted the Application, and after expedited briefing and oral argument, on June 30, 2014 the Superior Court issued an Opinion dismissing the appeal.

B. Removal Of The Case, The Federal Declaratory Judgment Action, Appeal To The Third Circuit Appeal, and Remand Back To State Court.

On July 9, 2014, Freeh and FSS filed a Notice of Removal with the United States District Court for the Middle District of Pennsylvania, asserting that the District Court had diversity jurisdiction over the case (hereinafter “Removed Action”).³ That same day, Freeh and FSS filed a separate declaratory judgment action in the Middle District of Pennsylvania, asking the District Court to conclude that it could properly exercise diversity jurisdiction in this action, and also to declare that Freeh and FSS could remove this case to federal court even though Dr.

³ The case number in federal court was: *Graham B. Spanier v. Louis J. Freeh and Freeh Sporkin & Sullivan, LLP*, No. 4:14-CV-01316-MEM, in the United States District Court for the Middle District of Pennsylvania (Malachy, J.)

Spanier had not yet filed a complaint (hereinafter “Declaratory Judgment Action”).⁴

On August 8, 2014, Dr. Spanier filed a Motion to Remand in the Removed Action arguing, among other things, that Defendants’ removal of the case was procedurally improper because federal statutes and case law do not allow removal of a case initiated solely on a writ of summons before a complaint has been filed and because federal diversity jurisdiction was not apparent from the face of Defendants’ removal papers.⁵

On August 15, 2014, United States District Judge Malachy E. Mannion dismissed the Declaratory Judgment Action as moot in light of Defendants’ simultaneous efforts to remove the defamation case to federal court, and he also issued an Order to Show Cause in the Removed Action, concluding that Defendants had not sufficiently pleaded diversity of citizenship and directing Defendants to show cause as to why the case should not be dismissed or remanded for lack of subject matter jurisdiction. On August 22, 2014, Defendants filed

⁴ This was technically a separate case and had a different case number and caption: *Louis J. Freeh and Freeh Sporkin & Sullivan, LLP v. Graham B. Spanier*, No. 4:14-CV-01310-MEM, in the United States District Court for the Middle District of Pennsylvania (Malachy, J.).

⁵ Dr. Spanier also argued that federal diversity jurisdiction was not apparent from the face of Defendants’ affidavits, and accordingly sought jurisdictional discovery, which the Court granted.

additional information in the Removed Action regarding the citizenship of FSS. Shortly thereafter Plaintiff sought jurisdictional discovery directed toward the question of Defendants' citizenship, which the Court granted.

On September 15, 2014, Freeh and FSS filed a Notice of Appeal in the District Court, appealing Judge Mannion's dismissal of their Declaratory Judgment Action to the U.S. Court of Appeals for the Third Circuit.⁶ On October 10, 2014, Dr. Spanier filed a Motion for Summary Affirmance in the Third Circuit, arguing that Judge Mannion's dismissal of the Declaratory Judgment Action was proper and that the appeal should be disposed of summarily without full briefing. The Third Circuit agreed, and on November 25, 2014, it issued an Order granting Dr. Spanier's Motion for Summary Affirmance and entered judgment for Dr. Spanier.

In the Removed Action, Judge Mannion heard oral argument regarding subject matter jurisdiction on November 14, 2014, and shortly thereafter on November 26, 2014, the Court issued an Order and Memorandum opinion agreeing with Dr. Spanier and holding that Defendants' removal was procedurally improper because Plaintiff had not yet filed his complaint. Judge Mannion remanded the Removed Action back to the Centre County Court of Common Pleas.

⁶ The case number for this appeal was: *Louis J. Freeh and Freeh Sporkin & Sullivan, LLP v. Graham B. Spanier*, No. 14-3935, in the United States Court of Appeals for the Third Circuit.

C. Post-Remand Proceedings In The Court of Common Pleas.

On March 18, 2015, after this action was returned to the Centre County Court of Common Pleas, Dr. Spanier filed a Motion to Modify the Stay requesting that the Court partially lift the previously-entered stay of proceedings so that the case can move forward and discovery can commence. Dr. Spanier also filed a Motion for Leave to Join Additional Parties, requesting to add as parties Penn State and Freeh Group International Solutions (“FGIS”), another Freeh entity that participated in the Penn State investigation. Appended to the Motion for Leave to Join Additional Parties is Dr. Spanier’s proposed Complaint asserting claims against Freeh and FSS for defamation, against Penn State for breach of contract, and against FGIS for tortious interference. Dr. Spanier’s motions request leave to file the proposed Complaint as part of the lifting of the stay.

On the same day Plaintiff filed these motions, counsel met in chambers with Judge Grine and discussed the status of the case and Dr. Spanier’s filings. Judge Grine issued an Order setting a pre-trial conference for May 13, 2015. On April 10, 2015, Defendants filed a Motion for Assignment of an Out of County Judge, arguing that an out-of-county judge should be assigned to this action. Defendants filed a Supplemental Submission on April 15, 2015, after their preferred out-of-county judge, Judge Todd A. Hoover of the Dauphin County Court of Common Pleas, announced an indefinite medical leave of absence. On April 29, 2015, Dr.

Spanier filed a Memorandum of Law in Opposition to Defendants' Motion for Appointment of an Out of County Judge.

On April 29, 2015, Judge Grine recused himself from the case and cancelled the pre-trial conference previously scheduled for May 13. On June 1, 2015, after Plaintiff withdrew his objection to the appointment of an out-of-county judge, Centre County President Judge Thomas King Kistler issued an Order granting the Motion for Assignment of an Out of County Judge. Judge Kistler stated that the matter would be referred to the A.O.P.C. for appointment of a trial judge. On July 1, 2015, Judge Robert J. Eby issued the Order of the Court directing the Plaintiff to file the instant Status Report summarizing the current status of the case.

III. Pending Motions.

There are two motions now pending before the Court, both filed by Plaintiff:

- Plaintiff's Motion to Modify the Stay; and
- Plaintiff's Motion to Join Additional Parties.

With respect to the stay, Plaintiff requests that the Court modify the stay of this action, in place since February 25, 2014, to permit the case to go forward and allow the parties to engage in discovery. (*See generally* Mar. 18, 2015 Mem. of Law in Supp. of Mot. to Modify the Stay.) Plaintiff's brief argues that the stay was originally put in place due to the possibility that certain witnesses — including potentially Dr. Spanier — would assert their Fifth Amendment rights during the

civil case in light of the pending criminal cases against Dr. Spanier, former Penn State Athletic Director Tim Curley, and former Penn State Senior Vice President for Finance and Business Gary Schultz. (*Id.* at 7-11.) Therefore, Judge Grine stayed this action until the resolution of the criminal proceedings, on the assumption that the criminal cases would go to trial in 2014. (*Id.* at 5-6.)

Defendants have been adamant since the outset of the action that Plaintiff should file a complaint detailing his claims against Defendants. (*Id.* at 3, 5-7.) Because the suit was instituted by Writ of Summons and then stayed, no operative complaint has yet been filed. (*Id.* at 6-7.) Plaintiff argues that because of the unanticipated delay in the resolution of the criminal cases, and because Dr. Spanier has stated that he will not take the Fifth Amendment in this action, the Court should lift the stay in order to allow this action to proceed. Plaintiff does request, however, that the Court keep a partial stay in place with respect to any third-party witnesses that do assert their Fifth Amendment rights in light of the ongoing criminal proceedings. (*Id.* at 10.) It is anticipated that this issue will not arise, if at all, until the later stages of discovery. (*Id.*)

With respect to the Motion to Join Additional Parties, Plaintiff requests the Court's leave to join Penn State and Freeh Group International Solutions ("FGIS") (an entity affiliated with Defendants Louis Freeh and FSS) as additional defendants in this action. (*See generally* Mar. 18, 2015 Mem. of Law in Supp. of Mot. to Join

Additional Defs.) Plaintiff argues that the claims he seeks to assert against Penn State and FGIS arise out of the same series of occurrences as the claims against Defendants Freeh and FSS (namely the arrest and prosecution of Sandusky, the Freeh investigation, and release of the Freeh Report) and involve common questions of law and fact. Therefore, granting leave to include those claims in this action would comport with Pennsylvania Rules of Civil Procedure 2232(c) and 2229(b), and would promote judicial economy. (*Id.* at 11-18.)

Specifically, the claims against Penn State for breach of a contractual non-disparagement clause arise out of Penn State's publication of the Freeh Report (and thus are based on the same statements as the defamation claims against Freeh and FSS), as well as statements made by Penn State trustees concerning the Freeh investigation and the assertions made in the Freeh Report. (*Id.* at 13-14.) The tortious interference claim against FGIS arises out of related statements made by Freeh and FGIS during the Freeh investigation. (*Id.* at 14.) Plaintiff argues that because all of these claims are so closely intertwined, they should be tried together with Penn State and FGIS joined as defendants in this action. (*See generally id.*) Plaintiff attached a proposed Complaint as Exhibit A to his Memorandum of Law in Support of Motion to Join Additional Parties, and requests that the Court grant leave to file this Complaint so that this action can proceed.

Defendants have not (thus far) informed Plaintiff of their position on these two motions, notwithstanding the fact that Defendants have repeatedly stated (both publicly and in pleadings) that they *want* Plaintiff to file a Complaint and *want* the stay to be lifted so that Plaintiff's case can move forward expeditiously to a determination of the merits, which is exactly what these motions are designed to achieve.

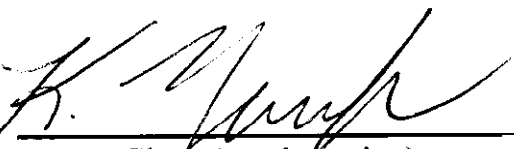
Accordingly, in order to move this case forward, Plaintiff respectfully requests entry of a Scheduling Order convening a prompt case management conference with the parties (either telephonically or in person) so that Defendants can inform the Court (and Plaintiff) whether they intend to oppose or support the above-referenced motions. If Defendants intend to oppose either motion, Plaintiff requests that the Court enter a Scheduling Order setting a briefing and hearing schedule that will allow these motions to be resolved expeditiously so the case can proceed to discovery.

IV. Other Procedural Issues.

Plaintiff respectfully submits that, since Penn State and FGIS are the additional parties that Plaintiff seeks to add to the case by virtue of Plaintiff's Motion To Join Additional Parties, and since both of these proposed additional defendants are central to (and inextricably intertwined with) Plaintiff's claims, counsel for both of these proposed additional defendants should be given notice of

the case management conference and/or briefing schedule requested above. For its part, Penn State, through its outside counsel, has informed Plaintiff that they do not take any position on either of the two pending motions. Providing Penn State and FGIS notice of any hearing or consideration of this issue will allow Penn State to inform the Court of any change in its position, and will allow all interested parties to be heard, will avoid duplication of effort, conserve judicial resources, and eliminate the need to re-litigate these same issues to address any post-hoc objections these proposed additional defendants may have after they are formally joined. To that end, Plaintiff intends to provide Penn State and FGIS a service copy of this filing.

Dated: July 31, 2015

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the below counsel of record on July 31, 2015 via email and first class mail.

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Dated: July 31, 2015

Appendix A

Court of Common Pleas - Case No. 2013-2707	
7/11/13	Writ of Summons
8/2/13	Praecipe to Reissue Writ of Summons
9/12/13	Praecipe to Issue Amended Writ of Summons
9/30/13	Entry of Appearance of L. Welsh
9/30/13	Entry of Appearance of R. Heim, M. Kichline, A. Mehrotra, and W. McEnroe
9/30/13	Praecipe to File Complaint
10/18/13	Memorandum of Law in Support of Motion to Stay Civil Proceedings
10/18/13	Plaintiff's Motion to Stay Civil Proceedings
11/12/13	Opposition of Defendants to Motion of Plaintiff to Stay Civil Proceedings
11/13/13	Scheduling Request
12/20/13	Decorum Order
12/30/13	Continuance Request
2/25/14	Opinion and Order Regarding Motion to Stay Civil Proceedings
3/17/14	Defendants' Emergency Motion for Reconsideration
3/17/14	Defendants' Memorandum in Support of Emergency Motion for Reconsideration
3/18/14	Order (Denying Defendants' Emergency Motion for Reconsideration Without Hearing)
3/25/14	Notice of Appeal
3/26/14	1925 (B)(1) Order
3/31/14	Defendants' Concise Statement of Matters Complained of on Appeal
4/8/14	Opinion in Response to Matters Complained of on Appeal
7/9/14	Notice of Having Filed a Notice of Removal
1/20/15	Order (Rescheduling January 20, 2015 Pretrial Conference)
3/16/15	Entry of Appearance – K. Yurchak
3/16/15	Motion for Admission - A. Phillips
3/16/15	Motion for Admission - E. Locke
3/16/15	Motion for Admission - T. Clare
3/18/15	Motion for Leave to Join Additional Parties
3/18/15	Memorandum in Support of Motion for Leave to Join Additional Parties
3/18/15	Motion to Modify the Stay
3/18/15	Memorandum in Support of Motion to Modify Stay
3/18/15	Order Granting <i>Pro Hac Vice</i> - A. Phillips
3/18/15	Order Granting <i>Pro Hac Vice</i> - E. Locke
3/18/15	Order Granting <i>Pro Hac Vice</i> - T. Clare
3/18/15	Order (Setting May 13, 2015 Pretrial Conference)
4/10/15	Motion for Assignment of Out-of-County Judge
4/10/15	Memorandum in Support of Motion for Out of County Judge
4/15/15	Supplemental Submission Regarding Out of County Judge
4/29/15	Memorandum in Opposition to Defendants' Motion
4/30/15	Order (Judge J. Grine Recusal)

Appendix A

5/5/15	Reply Memorandum of Louis Freeh and Freeh Sporkin & Sullivan, LLP in Support of Their Motion for the Assignment of an Out-of-County Judge
6/1/15	Order (Granting Motion for Out of County Judge)
7/1/15	Order of the Court (Parties to Submit a Concise Status Report Memorandum)
	<u>Middle District of PA - Case No. 14-1316</u>
7/9/14	[Dkt. 1] Notice of Removal
8/5/14	[Dkt. 2] Petition (Special Admission by A. Mehrotra)
8/5/14	[Dkt. 2-1] Code of Professional Conduct
8/6/14	[Dkt. 3] Order (Approving Special Admission by A. Mehrotra)
8/8/14	[Dkt. 4] Petition (Special Admission by T. Clare)
8/8/14	[Dkt. 5] Petition (Special Admission by E. Locke)
8/8/14	[Dkt. 6] Petition (Special Admission by A. Phillips)
8/8/14	[Dkt. 7] Plaintiff's Motion to Remand
8/8/14	[Dkt. 8] Plaintiff's Memorandum of Law in Support of Motion to Remand
8/8/14	[Dkt. 9] Plaintiff's Motion for Leave to Conduct Jurisdictional Discovery
8/8/14	[Dkt. 10] Plaintiff's Memorandum of Law in Support of His Motion for Leave to Conduct Jurisdictional Discovery
8/11/14	[Dkt. 11] Order (Approving Special Admission by E. Locke)
8/11/14	[Dkt. 12] Order (Approving Special Admission by Thomas A. Clare)
8/11/14	[Dkt. 13] Order (Approving Special Admission by A. Phillips)
8/15/14	[Dkt. 14] Order to Show Cause
8/20/14	[Dkt. 15] Stipulation and Proposed Order to Extend the Deadline to Respond to Plaintiff's Motion to Remand
8/20/14	[Dkt. 16] Order Approving Stipulation and Proposed Order to Extend the Deadline to Respond to Plaintiff's Motion to Remand
8/22/14	[Dkt. 17] Defendants' Submission in Response to the Court's August 15, 2014 Order to Show Cause
8/22/14	[Dkt. 17-1] Declaration of Louis Freeh in Support of Defendants' Submission in Response to Court's August 15, 2014 Order to Show Cause
8/22/14	[Dkt. 17-2] Declaration of Eugene R. Sullivan in Support of Defendants' Submission in Response to Court's August 15, 2014 Order to Show Cause
9/5/14	[Dkt. 18] Defendants' Memorandum of Law in Opposition to Plaintiff's Motion to Remand
9/5/14	[Dkt. 19] Order (Plaintiff to Respond to Defendants' Declarations on September 12, 2014)
9/9/14	[Dkt. 20] Stipulation and Proposed Order to Extend the Deadline to Respond to Defendants' Declarations Regarding the Court's Show Cause Order
9/12/14	[Dkt. 21] Plaintiff's Consolidated Reply Brief in Support of His Motion to Remand and Response to Declarations Submitted by Defendants in Response to the Court's Order to Show Cause
9/15/14	[Dkt. 22] Stipulation and Proposed Order to Extend the Deadline to Respond to Defendants' Declarations Regarding the Court's Show Cause Order
9/15/14	[Dkt. 23] Defendants' Motion for Leave to Reply to Plaintiff's Response to

Appendix A

	Declarations Submitted by Defendants in Response to the Court's Order to Show Cause
9/15/14	[Dkt. 24] Order (Granting Discovery and Scheduling November 14, 2014 Hearing)
9/18/14	[Dkt. 25] Order (Granting Defendants' Motion for Leave)
9/18/14	[Dkt. 26] Freeh's Reply in Further Support of Defendants' Submission in Response to the Court's August 15, 2014 Order to Show Cause - Order to Show Cause - "Exhibit A"
10/15/14	[Dkt. 27] Stipulation and [Proposed] Order Regarding Confidentiality of Certain Internal Partnership Documents
10/15/14	[Dkt. 28] Approved Stipulation and [Proposed] Order Regarding Confidentiality of Certain Internal Partnership Documents
11/4/14	[Dkt. 29] Order (Briefing for November 14, 2014 Hearing to be filed November 11, 2014)
11/10/14	[Dkt. 30] Plaintiff's Brief Regarding Subject Matter Jurisdiction - Filed Under Seal
11/10/14	[Dkt. 31] Defendants' Memorandum Demonstrating The Existence of Complete Diversity Jurisdiction Submitted in Response to the Court's November 4, 2014 Order
11/26/14	[Dkt. 34] Memorandum (Remanding Case to Court of Common Pleas of Centre County)
11/26/14	[Dkt. 35] Order (Granting Plaintiff's Motion to Remand)
1/28/15	[Dkt. 36] Withdrawal of Appearance of A. Mehrotra
	Superior Court of PA - 539 MDA 2014
3/25/14	Notice of Appeal
3/26/14	Application for Special Relief
3/31/14	Appeal Docket Sheet
4/9/14	Order (Granting Appellants' Application)
4/9/14	Order (Dismissing Duplicative Appeal)
4/22/14	Appellants' Designation of Contents of Reproduced Record
4/22/14	Brief of Appellants Louis J. Freeh and Freeh Sporkin & Sullivan, LLP
4/22/14	Reproduced Record
5/6/14	Brief of Appellee Graham B. Spanier
5/12/14	Reply Brief of Appellants Louis J. Freeh and Freeh Sporkin & Sullivan, LLP
6/30/14	Order (Denying Appeal)
	US Court of Appeals for the 3d Circuit - 14-3935
9/18/14	Freeh, Transcript Order Form (filed)
10/3/14	Briefing and Scheduling
10/3/14	Civil Appeal Information Statement
10/3/14	Concise Summary of Case
10/3/14	Entry of Appearance – R. Heim
10/3/14	Entry of Appearance – M. Kichline
10/3/14	Entry of Appearance – W. McEnroe
10/3/14	Entry of Appearance – A. Mehrotra
10/8/14	Entry of Appearance – A. Phillips

Appendix A

10/8/14	Entry of Appearance – E. Locke
10/8/14	Entry of Appearance – T. Clare
10/10/14	Appellee Graham B. Spanier's Motion for Summary Affirmance
10/20/14	Opposition of Appellants Louis J. Freeh and Freeh Sporkin & Sullivan, LLP to Appeal Graham B. Spanier's Motion for Summary Affirmance
10/30/14	Graham B. Spanier's Reply in Support of his Motion for Summary Affirmance
11/25/14	Order (Granting Summary Affirmance)
11/25/14	Entry of Judgment
	<u>Middle District of PA - Case No. 14-1310</u>
7/8/14	20140708 [Dkt. 1] Complaint (For Declaratory Judgment)
7/8/14	20140708 [Dkt. 2] Summons in a Civil Action
7/8/14	20140708 [Dkt. 2-1] Waiver of the Service Summons
7/14/14	20140714 [Dkt. 3] Letter from Judge Mannion Regarding Case Management Order
8/5/14	20140805 [Dkt. 4] Petition (Special Admission by A. Mehorta)
8/5/14	20140805 [Dkt. 4-1] Code of Professional Conduct
8/6/14	20140806 [Dkt. 5] Order (Approving Special Admission by A. Mehorta)
8/15/14	20140815 [Dkt. 6] Memorandum (Dismissing Declaratory Judgment Complaint)
8/15/14	20140815 [Dkt. 7] Order (Dismissing Declaratory Judgment Complaint as Moot)
9/15/14	20140915 [Dkt. 8] Notice of Appeal
10/22/14	20141022 [Dkt. 10] Order (Granting Summary Affirmance)