

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOUGLAS MARSHALL, SIMON CAMPBELL,	:	
ROBERT ABRAMS, AND TIMOTHY DALY,	:	
Plaintiffs	:	Civil Action No.: 2:21-cv-04336
	:	
v.	:	
	:	
PETER C. AMUSO, et al.	:	
Defendants.	:	

**ANSWER WITH AFFIRMATIVE DEFENSES OF
DEFENDANTS, PENNSBURY SCHOOL DISTRICT, CHERRISSA GIBSON,
CHRISTINE TOY-DRAGONI, JOSHUA WALDORF, HOWARD GOLDBERG,
T.R. KANNAN, LINDA PALSKEY, DEBRA WACHSPRESS,
AND ANN LANGTRY TO PLAINTIFFS' COMPLAINT**

INTRODUCTION

The averments of the Introduction, although not requiring a response, are denied.

THE PARTIES

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that Peter C. Amuso was a Solicitor at times relevant to the Complaint.
6. Admitted that Michael T. Clarke was a Solicitor for Pennsbury School District at times relevant to the Complaint.
7. Admitted.
8. Admitted.
9. Admitted in part, denied in part. Christine Toy-Dragoni was the President of Pennsbury School Board. She is no longer on the Board.

10. Admitted in part, denied in part. Defendant, Joshua Waldorf was the Vice President of Pennsbury School Board. He is still on the Board.

11. Defendant, Chip Taylor has been dismissed.

12. Admitted in part, denied in part. Defendant, Howard Goldberg was a member of Pennsbury School Board. He is no longer on the Board.

13. Admitted.

14. Defendant, Michael Pallotta has been dismissed.

15. Admitted.

16. Admitted.

17. Admitted in part, denied in part. Debra Wachspress was a member of the Pennsbury School Board. She is no longer on the Board.

18. Admitted in part, denied in part. Ann Langtry was the Supervisor of Communication Strategies. She is now retired.

JURISDICTION AND VENUE

19. Admitted as to jurisdiction.

20. Admitted as to venue.

STATEMENT OF FACTS

Pennsbury's Censorship Policies and Procedures

21. The averments of Paragraph 21 are denied in that the Policy referred to as 903 has been repealed, and has been replaced with a policy that cures the issues addressed in Court's granting of the Preliminary Injunction.

22. Denied. See the response to Paragraph 21.

23. Denied. See the response to Paragraph 21.

24. Denied. See the response to Paragraph 21.

25. Denied. See the response to Paragraph 21.

26. Denied. See the response to Paragraph 21.

27. Denied. See the response to Paragraph 21.

28. Denied. See the response to Paragraph 21.

29. Denied as stated. As indicated in the response to Paragraph 21, Policy 903 as it existed as been repealed. The claims regarding the excise of speech from official recordings was temporary.

30. Admitted. By way of further response, the Policy averred to in Paragraph 30 has been repealed and replaced.

31. Denied. It is denied that the Defendants believe people who speak to them at Board meetings do not have any First Amendment rights.

32. Denied. See the response to Paragraph 21.

33. Denied. The Policy 903 averred to in Paragraph 33 has been repealed. By way of further response, at no time did anyone have restrictions imposed on their right to present at the School Board meeting.

34. Admitted in part, denied in part. It is admitted that there was a Civility Policy in effect on May 20, 2021. It is denied that the Policy still exists, and in fact, Policy 922 has been repealed and not replaced.

35. Denied as stated in that Policy 922 has been repealed and not replaced.

36. Denied in that Policy 922 has been repealed. The former Policy is a writing which speaks for itself.

37. Admitted.

Defendants' Censorship of Plaintiffs' Written Comments

38. Admitted in part, denied in part. It is admitted that during Covid meetings were held online or online with a very limited audience capacity. It is believed that with little exception comments were presented and displayed.

39. Admitted that these issues were raised by Robert Abrams repeatedly at meetings and he was given the opportunity to express those views.

40. Admitted. The email response by T.R. Kannan was in keeping with the Policy then in effect.

41. Admitted in part, denied in part. A very limited of what were perceived as "personal attacks" in violation of the Policy 903 were excluded. By way of further response, the Policy 903, which is referred to in Paragraph 41, has been repealed.

42. Admitted.

43. The averments of Paragraph 43 are directed to other than Responding Defendants and, therefore, no response is required.

44. Denied as stated. Under the policy that then existed with regard to comments that were personally directed to members of the administration that could tarnish their reputation, Mr. Goldberg, after review of the comments by the solicitors and upon advice of the solicitors believed that a Board Member did not have to read such comments aloud.

45. Admitted.

46. Admitted in part, denied in part. It is admitted that in following the then-existing Policy, some comments may not have been posted. By way of further response, Daly had many opportunities to and did voice his opinions regarding the issues raised in Paragraph 46 on numerous occasions.

47. Admitted that Abrams has, as have the other Plaintiffs were given opportunities, and did voice their opinions at meetings on numerous occasions. To the extent specific individuals were baselessly accused of financial improprieties that was seen as a violation of the then existing policy which has since been repealed.

48. Admitted. By way of further response the specific allegations raised are denied and strict proof thereof is demanded at the time of trial.

49. Admitted that the comments were reviewed by the solicitor and Defendant Langtry and the email referenced in paragraph 49 was sent based on the then-existing Board Policy 903 which has been repealed.

50. Admitted. It was a recurring theme that was repeated at numerous meetings and comments.

51. Admitted that the comment may have been declined as per the then-existing Policy 903 which has been repealed.

52. Admitted based on information and belief.

53. Denied as to “nearly uniformly,” however, the issues being raised by parents were the same issues being raised in the school districts, not only throughout Bucks County, but Pennsylvania, and the nation.

54. Admitted. At numerous meetings Abrams raised the issue that if enrollment declined, the number of teachers and staff should decline, along with the other issues.

55. Admitted in part, denied in part. It is admitted the building was closed due to snow. The remaining averments of Paragraph 55 are mischaracterizations. They were posted for individuals to read. It is admitted that, at some point, the decision was made not to have Board

members read the individual comments, but rather have them posted to avoid the allegation that the reading somehow reflected a view point in who was reading it, or how it was being read.

56. Admitted as the comments. The averments of Paragraph 56 speak for themselves in that the criticism and allegations regarding unfounded conduct of something that an individual did as an elected member of the Centennial School District has no bearing of the business of the Pennsbury School District.

57. Admitted pursuant to the then-existing Policy 903.

Defendants' Censorship of Douglas Marshall's Public Online Speech

58. Admitted in part, denied in part. Denied as to allegations regarding "no stranger" as vague. The Equity Vision Statement is a written document which speaks for itself. It is denied that Defendant, Gibson was tasked with "policing equity." There is a job description for the position.

59. Denied as stated. The averments of Paragraph 59 are more or less a statement by Plaintiffs as to how Americans feel and no response is required.

60. Admitted.

61. Admitted that there was a reference to the then-existing 903 Policy which has since been repealed.

62. Admitted. It is admitted that Douglas Marshall addressed the Board during the public comment period.

63. Admitted that Marshall did address the Board during the public comment period.

64. Admitted that during his address to the Board during the public comment period, Marshall gave his historical beliefs without interruption.

65. Admitted that Marshall addressed the Board during the public comment period.

66. Admitted that Marshall addressed the Board during the public comment period without interruption and gave his beliefs and cited to FBI statistics.

67. Admitted that Marshall addressed the Board during the public comment period.

68. Admitted that Marshall addressed the Board during the public comment period.

69. Admitted that an email was sent based on the belief as as to then-existing Policy 903 which has since been repealed.

70. Admitted that Defendant, Gibson is entitled to her view points, and that she found some of Marshall's comments were not in compliance with the then existing Policy 903 which has since been repealed.

71. Admitted in part, denied in part. While agreeing that Mr. Marshall is entitled to express his contradictory views, she did reasonably believe that some of his statements could be harmful to some members of the community and were not in compliance with the then existing Policy 903 which has since been repealed.

72. Admitted as to Gibson's beliefs.

73. Admitted as to Gibson's beliefs that Marshall's comments were irrelevant to work taking place in the District and were not in compliance with the then existing policy 903 which has since been repealed.

74. Admitted in part, denied in part. Admitted as to Gibson's beliefs that Marshall's comments were not in compliance with the then existing Policy 903 which has since been repealed. It is denied that Gibson had the authority to "declare" the end of Marshall's speech which was presented and uninterrupted at the meeting.

75. Admitted as to Gibson's beliefs based on the compliance with the then-existing Policy 903 which has since been repealed.

76. Admitted. However, the statement of Marshall was not “shut down,” and Paragraph 76 refers to what Toy-Dragoni thought in retrospect.

77. Admitted.

78. Admitted.

79. Admitted that Langtry, was advised by counsel that the statements of Marshall did not need to be posted. That decision was later changed.

80. Admitted as to the original recording. It was later available.

81. Admitted that parts of the uninterrupted statement of Marshall at the meeting was not posted, that decision was changed and it was posted shortly thereafter.

82. Admitted that Gibson was asked if she would draft a response which would be reviewed.

83. Admitted that the statement speaks for itself, and was believed at the time to be in compliance with the then-existing Policy which has since been repealed.

84. Admitted.

85. Admitted.

86. Denied. It is denied that there was a culture of hostility to First Amendment rights. Admitted as to an email from an employee in support of the School District. The remaining averments of Paragraph 86 are denied.

87. Admitted that the recording was restored. As to the “disclaimer” it was only an understanding that the positing does not mean that it was endorsed by the School District.

88. Admitted.

89. The averments of Paragraph 89 are directed to other Responding Defendant, and therefore, no response is required. The exchange averred to in Paragraph 89 is available, and has been used and posted by Plaintiffs.

90. Admitted that the exchange is available regarding discussion of the topic of equity. It was requested by Board Member Waldorf that it be called by the proper names so that everyone have proper reference.

91. Admitted.

92. Admitted in part, denied in part. The averments of paragraph 92 do accurately reflect part of an exchange during the public comment period. It is denied that the subject of the presentation and Board vote was an “equality curriculum.” The presentation and the vote were on Policy 832, Education Equality.

93. Admitted only that the averments of Paragraph 93 do reflect part of an exchange that occurred at the meeting and cites a reliance on Policy 903 which has since been repealed.

94. The video exists of the incident averred to in Paragraph 94 which speaks for itself.

95. Admitted that Robert Abrams did express his view points regarding the equity policy. These were the same comments that had been made earlier.

96. There is a video of the exchange which speaks for itself. To the extent that Policy 903 was relied on, that Policy has been repealed.

97. Denied as stated. The policy averred to in Paragraph 97 has since been repealed.

98. Denied as to “expelling.” Any comments made by the Responding Defendant were believed to be in compliance with Policy 903 which has since been repealed.

99. Denied as to the relevance or significance of two words as alleged in Paragraph 99, however, by way of further response, they were in compliance with the Policy existing at the time which has since been repealed.

100. Denied as stated in regarding “expelled” from the meeting.

101. Admitted in part, denied in part. It was reasonably believed by some Responding Defendants that the comments were offensive, and a personal attack directed at Gibson following a presentation to the Board and were outside of the designated Public Comment period, The civility policy, referred to in Paragraph 101, has since been repealed.

Defendants’ Disruption of Campbell’s Speech at the June 17, 2021 School Board Meeting

102. Admitted that that proposal was on the agenda.

103. Admitted that Simon called the Board Members “snowflakes,” and made a comparison of the Board Chair to Mussolini. The Policy criticized by Simon Campbell has since been repealed.

104. The averments of Paragraph 104 are directed to other than Responding Defendants. In that there is reference to Policies and 903 and 922, Policy 903 has been repealed and replaced, and Policy 922 has been repealed.

105. Denied as stated. Responding Defendants acted in accordance with what they believed was the existing and lawful Policy at the time. Plaintiff reference to “snowflakes,” and comparisons to Mussolini are certainly, at the least, offensive.

The Continuing Impact of Defendants’ Censorial Policies on Plaintiffs’ Speech

106. Denied. To the contrary, Plaintiffs did not appear at all to be persuaded by the Policies and continued to speak and express their view points. By way of further response, no Plaintiff has been deprived of their allotted time to speak on any topic, and there has been no

censorship of Plaintiffs. Plaintiffs have not been precluded from bringing placards or banners to School Board meetings, and have not attempted to do so.

107. Denied. Those requirements are, and have not been required, at School Board meetings.

COUNT ONE
RIGHT OF FREE SPEECH, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
FACIAL CHALLENGE TO PENNSBURY POLICY 903, SPEECH CONTENT

108. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-107 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

109. The averments of Paragraph 109 are conclusions of law to which no response is required.

110. Denied. It is recognized that there are First Amendment protections in a limited public forum.

111. The averments of Paragraph 111 are conclusions of law to which no response is required.

112. The averments of Paragraph 112 are conclusions of law to which no response is required.

113. The averments of Paragraph 113 are conclusions of law to which no response is required.

114. The averments of Paragraph 114 are conclusions of law to which no response is required.

115. Admitted.

116. Admitted that criticism of school officials, school employees, school rules and regulations, school budgets, and school curriculum are germane to the business of school boards. Based on the then existing interpretation of the policy it was not believed it extended to personal attacks alleging criminal conduct or comparisons to Mussolini.

117. Denied. The averments of Paragraph 117 are denied in that Policy 103 has been repealed and replaced.

118. Denied. The averments of Paragraph 118 are denied in that the Policy 903 averred to has been repealed and replaced.

119. Denied. See response to Paragraph 118.

120. Denied. See response to Paragraph 118.

COUNT TWO

RIGHT OF FREE SPEECH, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983 AS-APPLIED CHALLENGE TO PENNSBURY POLICY 903, SPEECH CONTENT

121. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-120 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

122. The averments of Paragraph 122 are legal conclusions to which no response is required.

123. Denied as stated. A very small portion of the public comment made by Plaintiffs was ever "censored." Any removal or "censorship" as alleged was believed to be compliance with Policy 903 which has since been repealed.

124. Denied as stated. It is believed that any actions taken were in compliance with then-existing Policy 903 which has since been repealed.

125. Denied. Policy 903, as averred to in Paragraph 125, has been repealed and replaced.

126. Denied. To the contrary, Responding Defendants did not act in a reckless, callous, intentional, or malicious manner. To the contrary, they believe they were acting in accordance with the Policy 903, and for reasons they believed was in the best interest of the School District they had been elected or appointed to serve.

127. Denied as stated. In a show of good faith, Responding Defendants have complied with the Court's prior ruling on November 17, 2021 and have repealed Policy 903 and replaced it, and totally repealed Policy 922. It is denied that Plaintiffs are in any way entitled to punitive damages or permanent injunctive relief. Defendant is no longer enforcing any the Policies averred to in the Complaint.

COUNT THREE
RIGHT TO PETITION, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
FACIAL CHALLENGE TO PENNSBURY POLICY 903, SPEECH CONTENT

128. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-127 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

129. The averments of Paragraph 129 are conclusions of law to which no response is required.

130. The averments of Paragraph 130 are conclusions of law to which no response is required.

131. The averments of Paragraph 131 are conclusions of law to which no response is required.

132. Denied. Any references to Policy 903 is no longer relevant in that that Policy has been repealed and replaced.

133. Denied. The reference to Policy 903 is no longer relevant in that that Policy has been repealed and replaced.

134. Denied. The averments of Paragraph 134, to the extent they are relying on Policy 903 are no longer relevant in that Policy 903 has repealed and replaced.

135. Admitted in part, denied in part. To the extent that the issues averred to Paragraph 135 have already been decided by the Court in the ruling on the Preliminary Injunction, Responding Defendants accept that but deny that Plaintiffs are entitled to damages for permanent injunctive relief in that the Policies averred to have been repealed.

COUNT FOUR
RIGHT TO PETITION, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
AS-APPLIED CHALLENGE TO PENNSBURY POLICY 903, SPEECH CONTENT

136. Responding Defendant incorporates herein by reference their responses to Paragraphs 1-135 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

137. The averments of Paragraph 137 are conclusions of law to which no response is required. To the extent that the Court has ruled on any of the issues involving Paragraph 137, Responding Defendants accept the Court's ruling and have repealed the Policies in question.

138. Denied. To the extent that the averments of Paragraph 138 are no longer relevant in that Policy 903 has been repealed and replaced. Responding Defendants rely on same.

139. Denied. To the contrary, there is no continued deprivation of Plaintiffs' right to petition in violation of the First and Fourteenth Amendment. Defendants have in good faith complied with and relied on the Court's prior ruling.

COUNT FIVE
RIGHT OF FREE SPEECH, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
FACIAL CHALLENGE TO PENNSBURY POLICY 922, CIVILITY

140. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-139 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

141. Denied. The Policies averred to in Paragraph 141, although previously adopted, have been repealed.

142. Denied as stated. Policy 922 has been repealed.

143. Denied. Policy 922 has been repealed.

144. Denied. Policy 922 has repealed.

145. The averments of Paragraph 145 are legal conclusions to which no response is required.

COUNT SIX
RIGHT TO PETITION, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
FACIAL CHALLENGE TO PENNSBURY POLICY 922, CIVILITY

146. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-145 of the Plaintiffs' Complaint as if the same were more fully set forth herein at length.

147. Denied. The Policy referred to in Plaintiffs' Complaint has been repealed.

148. Denied. The Policy referred to in Plaintiffs' Complaint has been repealed.

149. Denied. The Policy referred to in Plaintiffs' Complaint has been repealed.

150. The averments of Paragraph 150 are conclusions of law to which no response is required.

COUNT SEVEN
CONSPIRACY TO VIOLATE CIVIL RIGHTS
U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983

151. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-150 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

152. Denied as to Responding Defendants.

153. Denied as to Responding Defendants. At all times material to the Complaint, Responding Defendants believed they were acting in compliance with the law and in compliance with Policy 903 which has since been repealed.

154. Denied. It is denied that there has any continuation to deprive Plaintiffs of right to free speech. To the contrary, the opposite is true. Plaintiffs' Complaint fails to state a cause of action for punitive damages for permanent injunctive relief.

By their continuation of a lawsuit which could be resolved, are not entitled to Section 1988 attorneys' fees.

COUNT EIGHT
RIGHT OF FREE SPEECH, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
FACIAL CHALLENGE TO PENNSBURY POLICY 903, ADDRESS DISCLOSURE

155. Responding Defendant incorporates herein by reference their responses to Paragraphs 1-154 of the Plaintiffs' Complaint as if the same were more fully set forth herein at length.

156. The averments of Paragraph 156 are conclusions of law to which no response is required.

157. Denied. To the contrary, Pennsbury has not required announcement of home address.

158. Denied as a conclusion of law to which no response is required.

COUNT NINE
VAGUENESS, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
PENNSBURY POLICY 903

159. Responding Defendants incorporates herein by reference their responses to Paragraphs 1-158 of Plaintiffs' Complaint as if the same were more fully set forth herein at length.

160. The averments of Paragraph 160 are conclusions of law to which no response is required.

161-162. Denied as stated. The averments of Paragraphs 161-162 are denied in that the Policy 903, which is the subject of Count IX, has been repealed and replaced. There has not been any allegation of constitutional violations since the Court's ruling on the Preliminary Injunction.

COUNT TEN
VAGUENESS, U.S. CONST. AMENDS. I, XIV, 42 U.S.C. § 1983
PENNSBURY POLICY 922

163. Responding Defendants incorporate herein by reference their responses to Paragraphs 1-162 of the Plaintiffs' Complaint as if the same were more fully set forth herein at length.

164. Denied. Policy 922 has been repealed.

165. Denied. Defendants are no longer enforcing the Policy which has been repealed. It is denied that Plaintiffs are entitled to permanent injunctive relief or attorneys' fees.

PRAYERS FOR RELIEF

1. Paragraph 1 of Plaintiffs' Prayer for Relief is moot in that (a), (b), (c) have been complied with by the School District.

2. Paragraph 2 of the Prayer for Relief is moot in that those Policies have been repealed.

AFFIRMATIVE DEFENSES

1. Claims against the individual Defendants in the official capacities are equivalent to claims against the governmental entity itself, they are redundant and to be dismissed. Dondero v. Lower Milford Twp., 431 F. Supp. 3d 590, 598 (E.D.Pa. 2019).

2. Individual claims against the Board members should be dismissed as they are not acting in an individual capacity, but as a member of a school board.

3. Plaintiffs' Complaint fails to allege "outrageous conduct" sufficient to support a punitive damage award against the individual Responding Defendants under any claim, and no basis for the extreme remedy of punitive damages against the individual Defendants exists, and such claims should be dismissed. Phillips v. Cricket Lighters, 883 A. 2d 439, 445 (Pa. 2005)

4. To the extent that the individual Defendants are entitled to qualified immunity, Defendants claim same.

5. To the extent the individual Responding Defendants are entitled to statutory or common law immunity, Defendants claims same.

6. Qualified Immunity must be granted unless the right is so clearly established that "every reasonable official would have understood that what he (she) was doing violated that right", in the instant matter Responding Defendants relied on a Policy promulgated by the PSBA and interpreted by legal counsel.

7. To the extend Responding Defendants relied on the advice of legal counsel as a defense, Responding Defendants claim as a defense to the claims and as to damage.

8. Responding Defendants at all times acted with a reasonable belief that they were not violating the rights on any speaker during the limited public forum of a School Board meeting.

9. Plaintiff's complaint fails to state a cause of action for conspiracy.

10. Plaintiffs should, in good faith, withdraw any claims based on allegations of continued violation in that they are well aware that such violations do not exist.

11. Plaintiffs sustained no damages or nominal damages.

12. Responding Defendants have fully complied with the Court's order and memorandum of November 17, 2021 and therefore the allegations as asserted are moot.

13. Negligence or carelessness conduct on the part of the Responding Defendants is not sufficient to maintain a cause of action pursuant to 42 U.S.C. § 1983 and Defendants claims same as defense.

14. At no time did the action of Responding Defendants rise to a level of either deliberate indifference, or willful misconduct or conscious shocking conduct.

15. Individual claims against those Responding Defendants who are neither policy makers nor elected officials should be dismissed in that they reasonably relied on directions from the solicitors and the then existing Policy 903, which has since been repealed.

WHEREFORE, Responding Defendants respectfully request that the Plaintiff's Complaint be dismissed and Defendants be awarded Judgment in their favor together with costs and counsel fees.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN, P.C.**



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Christine Toy-Dragoni, Joshua Waldorf, Howard

Goldberg, T.R. Kannan, Linda Palsky, Debra

Wachspress, and Ann Langtry

Date: April 18, 2022

CERTIFICATE OF SERVICE

I, Joseph J. Santarone, Esquire, hereby certify that a true and correct copy of the foregoing Answer with Affirmative Defenses was electronically filed with the Court this date and is available for viewing and downloading from the ECF System. All counsel of record was served via electronic notification.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN, P.C.**



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Date: April 18, 2022