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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Cassandra Adams Jones, <i>et al.</i> ,)	
)	
)	
<i>Petitioners,</i>)	
)	
)	No. 717 MD 2018
v.)	
)	
Kathy Boockvar, <i>et al.</i> ,)	
)	
)	
<i>Respondents.</i>)	
)	

**PETITIONERS’ ANSWER TO THE PRELIMINARY
OBJECTIONS OF RESPONDENT JOSEPH B. SCARNATI III**

Petitioners submit this Answer to the Preliminary Objections to the
Petition for Review (“Petition”) filed by Respondent Joseph B. Scarnati III.

**ANSWER TO PROCEDURAL HISTORY
AND FACTUAL ALLEGATIONS**

1. Admitted.
2. Admitted.

3. Admitted. Petitioners admit the averments in this paragraph but further respond by directing the Court to the Petition for its full and complete contents.

4. Admitted. Petitioners admit the averments in this paragraph but further respond by directing the Court to the Petition for its full and complete contents.

5. Admitted. Petitioners admit the averments in this paragraph but further respond by directing the Court to the Petition for its full and complete contents.

6. Denied. The averments in this paragraph purport to summarize the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

7. Admitted. Petitioners admit the averments in this paragraph but further respond by directing the Court to the Petition for its full and complete contents.

8. Denied. The averments in this paragraph, including subparts A-D, purport to summarize the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

9. Admitted. Petitioners admit the averments in this paragraph but further respond by directing the Court to the Petition for its full and complete contents.

ANSWER TO FIRST PRELIMINARY OBJECTION

10. Denied. The averments in this paragraph purport to summarize the claims made in the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

11. Denied. The averments in this paragraph purport to summarize the claims made in the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

12. Denied. The averments in this paragraph purport to summarize the claims made in the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

13. Denied. The averments in this paragraph purport to summarize the claims made in the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

14. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

15. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

16. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

17. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

18. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

WHEREFORE, Petitioners respectfully request that the Court overrule the First Preliminary Objection to the Petition for Review filed by Respondent Joseph B. Scarnati III.

ANSWER SECOND PRELIMINARY OBJECTION

19. Paragraphs 1-18 above are incorporated by reference as if fully set forth herein.

20. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

WHEREFORE, Petitioners respectfully request that the Court overrule the Second Preliminary Objection to the Petition for Review filed by Respondent Joseph B. Scarnati III.

ANSWER TO THIRD PRELIMINARY OBJECTION

21. Paragraphs 1-20 above are incorporated by reference as if fully set forth herein.

22. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

23. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

24. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

25. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

26. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

27. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

28. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

29. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

30. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

31. Denied. The averments in this paragraph purport to summarize the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

32. Denied. The averments in this paragraph purport to summarize the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

33. Denied. The averments in this paragraph purport to summarize the Petition. Petitioners refer to the Petition for its full and complete contents and deny anything inconsistent therewith.

34. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

35. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

WHEREFORE, Petitioners respectfully request that the Court overrule the Third Preliminary Objection to the Petition for Review filed by Respondent Joseph B. Scarnati III.

Dated: February 13, 2019

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