

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA

COVER SHEET - NOTICE OF FILING OF MOTION OR PETITION UNDER
LOCAL RULES OF CIVIL PROCEDURE

CASE CAPTION: In re: Appointment of a Receiver
For the Chester Upland School
District

CIVIL CASE NO. 2012-009781

NATURE OF MATTER FILED: (please check one)

- Petition Pursuant to Rule 206.1 Response to Petition Motion for Judgment on the Pleadings Pursuant to Rule 1034(a)
- Motion Pursuant to Rule 208.1 Response to Motion Summary Judgment Pursuant to Rule 1035.2
- Family Law Petition/Motion Pursuant to Rule 206.8

**FILING PARTY IS RESPONSIBLE FOR SERVICE OF THE RULE RETURNABLE
DATE OR HEARING DATE UPON ALL PARTIES**

A motion or petition was filed in the above captioned matter on the ____ day of _____, _____, which:

Requires you, Respondent, to file an Answer within twenty (20) days of the above date to this notice, or risk the entry of an Order in favor of the Petitioner. Answers must be filed and time stamped by the Office of Judicial Support by 4:30 PM on the following date _____, _____.

Requires all parties, to appear at a hearing/conference on the ____ day of _____, _____, at ____ in Courtroom ____, Delaware County Courthouse, Media, Pennsylvania. At this hearing/conference you must be prepared to present all testimony and/or argument, and must ensure that your witnesses will be present.

Was timely answered, thus requiring the scheduling of the following hearing in the above captioned matter on: _____, _____ at 10:00 AM in Courtroom _____.

At this hearing, all parties must be prepared to present all testimony and/or argument and **must ensure that their witnesses will be present.**

Qualifies as an Uncontested Motion or Petition, and as such requires neither an answer from the Respondent nor the scheduling of a hearing in this matter.

Has been assigned to Judge Barry C. Dozor

FOR OFFICE USE ONLY

Mailing date: _____

Processed by: _____

**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA
CIVIL DIVISION**

IN RE: APPOINTMENT OF A RECEIVER FOR
THE CHESTER UPLAND SCHOOL DISTRICT

CASE NO.: 2012-009781

ORDER

AND NOW, this ____ day of _____ 2021, upon consideration of the Emergency Motion to Compel Disclosure filed by Parent Intervenors Jazmine Campos, Latoya Jones, Tiffany Raymond, Precious Scott, and the Delaware County Advocacy & Resource Organization, any responses thereto, and any hearing thereon, it is hereby **ORDERED** that said Emergency Motion is **GRANTED**.

IT IS FURTHER ORDERED that the Receiver shall immediately produce to the parties, file with the Court, and release to the public the following documents and information:

- a. All proposals, including cover letters, narratives, exhibits, and attachments, submitted in response to the Request for Proposals for Potential Outsourcing of Management or Operation of District Schools for Chester Upland School District issued on October 26, 2020, and updated on January 17, 2021 (“Revised RFP”), except for any portions separately submitted and labeled confidential in accordance with the Revised RFP, which portions shall be submitted under seal to the Court;
- b. The names and titles of the members of the RFP Review Task Force; and
- c. All guidelines, rubrics, and criteria provided to the RFP Review Task Force for the purpose of evaluating RFP responses.

BY THE COURT:

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2021 MAR 10 PM 12:20
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**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA
CIVIL DIVISION**

IN RE: APPOINTMENT OF A RECEIVER FOR : CASE NO.: 2012-009781
THE CHESTER UPLAND SCHOOL DISTRICT :
: :
:

**PARENT REPRESENTATIVES
JAZMINE CAMPOS, LATOYA JONES, TIFFANY RAYMOND, PRECIOUS SCOTT,
AND THE DELAWARE COUNTY ADVOCACY & RESOURCE ORGANIZATION'S
EMERGENCY MOTION TO COMPEL DISCLOSURE
OF DOCUMENTS AND INFORMATION RELATED TO THE RFP REVIEW PROCESS**

Parent Intervenors Jazmine Campos, Latoya Jones, Tiffany Raymond, Precious Scott, and the Delaware County Advocacy & Resource Organization (together, "Parent Representatives"), by and through their undersigned counsel, respectfully submit the following Emergency Motion to Compel Disclosure of Documents and Information related to the Chester Upland School District Receiver's Request for Proposals for Potential Outsourcing of Management or Operations issued on October 26, 2020 and revised on January 17, 2021 ("Revised RFP").

Both the Financial Recovery Law, 24 P.S. § 6-601 et seq., and this Court's orders entitle Parent Representatives to be informed of, and meaningfully participate in, the RFP process currently underway in the Chester Upland School District, in order to ensure a quality education for their children. Despite these clear mandates, the Court-appointed Receiver continues to pursue its quest to outsource the instruction of Chester Upland's students and the management of its schools behind closed doors. Nearly two weeks after responses to the Revised RFP were submitted, and with review deadlines rapidly approaching, the Receiver is continuing to withhold fundamental documents and information related to the process, including the identity of the bidders, the proposals submitted, the final list of members of the task force assigned to review those proposals, and the guidelines the task force will use to conduct its assessments – all of which the Receiver committed to make publicly available weeks ago.

As a result of the accelerated timeline established by the Receiver, Parent Representatives' opportunity to investigate the qualifications of the bidders and to evaluate and provide input into the proposals submitted – proposals that could determine the fate of their children's futures – is quickly closing. For the reasons set forth herein, Parent Representatives seek emergency relief and respectfully request that this Honorable Court direct the Receiver to immediately produce all the proposals submitted in response to the Revised RFP; the names and titles of the members of the RFP Review Task Force; and any guidelines, rubrics, and criteria provided to the Review Task Force to evaluate RFP responses.

In further support of their Emergency Motion, Parent Representatives aver as follows:

1. Chester Upland School District ("CUSD"), a school district in the City of Chester, is in recovery status and is operating under a financial recovery plan pursuant to Section 621-A

of the School District Financial Recovery Law, 24 P.S. § 6-601 et seq. (the “Financial Recovery Law”).

2. Parent Representatives are parents of children attending elementary and middle schools within CUSD and a disability advocacy organization whose members include parents of children attending schools within CUSD.

3. Parent Representatives intervened in CUSD’s receivership proceedings before this Court in order to inform the development of a proposed Revised Financial Recovery Plan (“Revised Plan”) and to ensure that the Revised Plan, which is required to “[p]rovide for the delivery of effective educational services to all students,” is implemented in compliance with laws that implicate Parent Representatives’ educational rights. *See* 24 P.S. § 6-641-A(1).

4. On May 14, 2020, this Court issued an order (“May 14th Order”) approving the Revised Plan and establishing, *inter alia*, detailed prerequisites and requirements for issuing an RFP to outsource the management and delivery of educational services in CUSD.

5. The May 14th Order required CUSD’s Court-appointed receiver (“Receiver”) to conduct the RFP process in “a public manner,” in accordance with the Financial Recovery Law, 24 P.S. § 6-642-A(a)(2)(iii)(B). *See* May 14th Order at ¶ 7(c).

6. To ensure that the RFP process would be transparent and that Parent Representatives would be able to defend their legally enforceable interests, the Court put several safeguards in place, including requirements to publicly release financial audits and to timely post all Requests for Information (“RFI”) and RFPs issued on CUSD’s website. *See, e.g.*, May 14th Order at ¶¶ 1(b), 3, 9. The Court also directed the Receiver to provide a forum for the public to vet submitted proposals. *Id.* at ¶ 8(a).

7. On October 26, 2020, in violation of the May 14th Order, the Receiver secretly issued an RFP (“October 26th RFP”) that did not comply with the Financial Recovery Law. The Receiver did so without filing the requisite audits; without making the RFP and its preceding RFI publicly available; and without notifying parents, teachers, the community, or the Court of the status of the RFP process.

8. Instead of a public review process, the October 26th RFP created an RFP Review Task Force and established a timeline wherein the Task Force would review proposals and recommend finalists to the Receiver without any meaningful opportunity for public input and comment. The October 26th RFP did not identify the members of the Task Force or provide an explanation of how its members would be selected.

9. On December 4, 2020, Parent Representatives filed motions with the Court seeking to suspend the RFP timeline, obtain information about the RFP process, and revise the RFP in conformity with the May 14th Order and the Financial Recovery Law (“December 4th Motions”).

10. On January 11, the Court held a hearing on, *inter alia*, Parent Representatives’ December 4th Motions and other motions filed regarding the October 26th RFP.

11. At the hearing, the Receiver, through his counsel, represented that he would ensure the RFP process was transparent and that responses to the RFP would be provided to the public once they were submitted:

RECEIVER’S COUNSEL: “[We] will very quickly let you know when we’ll be in a position to share the RFP details with the general public. . . . once we get the bids in, it’s our intent to make that public process. And we understand the quest for transparency.” (1/11/21 Hearing Tr. 126:20-127:4)

12. The Receiver also told the Court that the identity of the RFP Review Task Force members and the guidelines they would be using to review proposals would be released publicly:

THE COURT: There's no doubt when the task force begins they're going to put together some guidelines in that regard and they're going to publish it, right, correct? They're going to publish it on the website and the guidelines, how they're going to work, when they're going to work will be publicly known. Is that correct?

RECEIVER'S COUNSEL: That is our intention. Yes.

(*Id.* 380:16-23)

**

PARENTS' COUNSEL: Are the names of the members of the review board going to be made public?

THE COURT: Of course they will be.

RECEIVER'S COUNSEL: We believe they've been made public.

THE COURT: I've been told they have been made public and somebody is shaking heads yes, somebody is shaking heads no. So you're going to have the Receiver testify shortly . . . and that will be a great question.

(*Id.* 128:25-129:12)

13. Subsequently, the Receiver testified about a number of individuals that had been invited to participate in the Review Task Force. *See id.* 297:2-17. However, as of the date of this filing the identities of the individuals that have actually been seated on the Task Force have not been released. Nor have any guidelines, rubrics, or criteria provided to the Task Force to evaluate RFP responses been publicly provided.

14. Throughout the hearing, the Court emphasized its expectation that the RFP process would be conducted in a public manner, and directed the Receiver to ensure that parents would be provided with the information necessary to fully and meaningfully understand and participate in the process:

THE COURT: Public access and input to what we're doing and what the Receiver is doing is uncompromising and transparency is going to remain a priority and a given requirement for our review in our recommendations. (*Id.* 18:17-21)

**

THE COURT: ...[T]here needs to be lots of public discussion and with the parents at these meetings giving input, weighing things, the pros and cons. You know, that's really important There's been a lot of public dialogue because we're going to be shaking the [tree] for the next year. So, I want them [parents] to be loved Because their input is really important... And parents collectively will be driving this. (*Id.* 263:23-264:16)

**

THE COURT: The Receiver has confirmed all along that parents and the general public will be invited to participate and be part of the vetting process. (*Id.* 378:8-11)

**

THE COURT: I should make a note of how many times [Receiver's counsel] used the word transparency and [adjourn] the hearing. (*Id.* 340:23-25)

15. Despite the Receiver's representations and the Court's directives, the Receiver has failed and continues to fail to provide Parent Representatives, as well as all parents in CUSD, with fundamental documents and information related to the RFP submissions and review process.

16. Following the hearing, the Receiver was ordered to, *inter alia*, revise and reissue the RFP and extend the submission deadline for proposals to February 25, 2021 (the "Revised RFP").

17. The Revised RFP sets forth an abbreviated schedule for reviewing and approving proposals: the Task Force must complete its evaluation of the RFP submissions and recommend finalists no later than April 12, and the Receiver must make a recommendation to the Court by May 17. *See* Revised RFP at 28-29.

18. On February 24, 2021, in anticipation of the Revised RFP submission deadline, counsel for Parent Representatives emailed Receiver's counsel to ask how and when information would be shared with Parent Representatives once proposals were submitted. Receiver's counsel responded that he would consult his client.

19. On February 26, 2021, counsel for Parent Representatives emailed Receiver's counsel to again inquire when the Receiver expected to disclose information about the proposals submitted in response to the Revised RFP. Receiver's counsel did not respond.

20. On March 2, counsel for Parent Representatives called Receiver's counsel in another effort to obtain information about the proposals submitted in response to the Revised RFP. Receiver's counsel did not respond.

21. On March 4, counsel for Parent Representatives again contacted Receiver's counsel in an effort to obtain information about the proposals submitted in response to the Revised RFP and about the RFP Review Task Force. Receiver's counsel responded that he would consult his client.

22. On March 8, counsel for Parent Representatives emailed Receiver's counsel reiterating Parent Representatives' request for documents and information and informing Receiver's counsel that they intended to seek court intervention if the documents and information were not produced. Receiver's counsel did not respond. A true and correct copy of this email is attached hereto as Exhibit A.

23. As of the time of this filing, the Receiver has not provided Parent Representatives with any of the documents or information he committed to providing at the January 11 hearing, including the identity of the bidders; the proposals submitted in response to the Revised RFP; the final list of members participating in the RFP Review Task Force; and the guidelines by which the Review Task Force will be evaluating proposals.

24. The documents and information sought by Parent Representatives are not confidential or proprietary and the Receiver cannot claim to be withholding them on that basis. Although the Revised RFP provides narrowly tailored protection for information in the proposals

that bidders believe should be treated as confidential, bidders were directed to file those portions of their proposals separately and informed that any portion not submitted as confidential was subject to public disclosure.¹ As a result, the nonconfidential portions of the proposals can and should be released immediately while the Receiver considers any requests for confidential treatment.²

25. The Receiver's failure to timely provide the documents and information requested by Parent Representatives constitutes a breach of his duties to conduct the RFP process in a public manner under the Financial Recovery Law and this Court's orders. *See* 24 P.S. § 6-642-A(a)(2)(iii)(B), May 14th Order at ¶ 7(c).

26. As a result of the Receiver's actions, Parent Representatives are being denied their right to participate in the public review process. Emergency relief is warranted because, given the extremely short timeline established by the Receiver, Parent Representatives will be foreclosed from providing any meaningful review, evaluation and comment unless the documents and information sought is immediately provided.

¹ The confidentiality provision reads, in full: "Confidentiality of Proposal: All proposals and other material submitted in response to this RFP are CUSD's property. CUSD may use, for any purpose it may deem appropriate, any information submitted in connection with this RFP. Any request for confidential treatment of any portion of a proposal must be submitted in writing concurrently with the submission of a proposal. Information for which confidential treatment is requested must be (1) separately submitted, (2) labeled CONFIDENTIAL, and (3) specifically identified in the non-confidential portion of the proposal or amendment (by reference to the confidential portion). A Provider must indicate in detail the justification for confidential treatment of each item of information for which confidential treatment is requested and demonstrate the harm that would result from the public release of the information. A statement simply indicating that disclosure of the information would result in competitive harm is not sufficient. The fact that the information is not available to the public from another source must be stated, if this is the case. By submitting a proposal to CUSD, the Provider agrees to accept CUSD's determination of the confidentiality and acknowledge that material for which confidential treatment is not granted may be disclosed after award. If CUSD determines that confidentiality cannot be afforded, a Provider will be notified and permitted to withdraw its proposal." *See* Revised RFP at 20-21.

² Parent Representatives reserve the right to contest any determination that material submitted by a bidder is entitled to be withheld from public disclosure.

RELIEF SOUGHT

WHEREFORE, for all the foregoing reasons, Parent Representatives respectfully request that this Honorable Court grant their Emergency Motion to Compel Disclosure and direct the Receiver to immediately produce to the parties, file with the court, and release to the public the following documents and information:

- a. All proposals, including cover letters, narratives, exhibits, and attachments, submitted in response to the Request for Proposals for Potential Outsourcing of Management or Operation of District Schools for Chester Upland School District issued on October 26, 2020, and updated on January 17, 2021 (the “Revised RFP”), except for any portions submitted separately and labeled confidential in accordance with the Revised RFP, which portions shall be submitted under seal with the Court;
- b. The names and titles of the members of the RFP Review Task Force; and
- c. All guidelines, rubrics, and criteria provided to the RFP Review Task Force for the purpose of evaluating RFP responses.

Date: March 10, 2021

Respectfully submitted,

/s/ Michael Churchill

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*Attorneys for Parent Representatives
Jazmine Campos, Latoya Jones, Tiffany
Raymond, Precious Scott, and the Delaware
County Advocacy & Resource Organization*

VERIFICATION

I, Michael Churchill, Esq., counsel for Parent Representatives, verify that the averments of fact contained in the foregoing Emergency Motion are true and correct to the best of my knowledge, information, and belief, based upon information provided to me. Pursuant to Pa. R.C.P. 1024(c), Parent Representatives lack sufficient knowledge or information to make this Verification on their own behalf. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Dated: March 10, 2021

/s/ Michael Churchill

Michael Churchill
*Attorney for Parent Representatives
Jazmine Campos, Latoya Jones, Tiffany
Raymond, Precious Scott, and the Delaware
County Advocacy & Resource Organization*

EXHIBIT A

From: Maura McInerney
Sent: Monday, March 8, 2021 9:48 AM
To: 'Sultanik, Jeffrey T.' <JSultanik@foxrothschild.com>
Subject: Request for Public Disclosure of Information
Importance: High

Dear Jeff,

I hope you are well. As you know, all responses to the Receiver's RFP were required to be submitted by February 25, 2021 and my colleague Claudia De Palma has reached out to you requesting (1) disclosure of information regarding the bidders who submitted proposals and (2) the names of all members of RFP Review Task Force and its guidelines.

During the course of the evidentiary hearing on January 11, 2021, the Receiver expressly committed to making this information public but has failed to do so. As reflected in the transcript of the January hearing you stated on the record that "once we get the bids in" was the Receiver's intention to make that public. Transcript at p. 127. In addition, Judge Dozer repeatedly indicating his assumption is the RFP process would be transparent and that information would be made publicly available throughout the course of the process and not just at the final stage. For example, when counsel asked whether the names of the Task Force would be made public, Judge Dozer replied, "Of course they will be." Transcript at p. 129. Thereafter, Judge Dozer also stated:

COURT: There's no doubt when the task force begins they're going to put together some guidelines in that regard and they're going to publish it, right, correct? They're going to publish it on the website and the guidelines, how they're going to work, when they're going to work will be publicly known. Is that correct?

MR. SULTANIK: That is our intention. Yes.

Transcript at p. 380.

Judge Dozor also repeatedly emphasized the duty of the Receiver to keep parents informed.

In light of the foregoing, we ask that you immediately disclose the names of task force members and guidelines, making this information publicly available on the website and that you similarly promptly disclose information relating to the bidders and make this publicly available as well. If we do not receive this information by **Wednesday March 10th** we will proceed to file a motion with the Court.

Best,

Maura

Maura McInerney, Esq.

(Pronouns: she/her)

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CERTIFICATE OF COMPLIANCE

I, Michael Churchill, Esq., certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Michael Churchill
Michael Churchill (Bar No. 04661)

ATTORNEY CERTIFICATION OF GOOD FAITH

Pursuant to Delaware County Local Rule 208.3(b)(3)(iv)

I, Claudia De Palma, Esq., counsel for Parent Representatives Jazmine Campos, Latoya Jones, Tiffany Raymond, Precious Scott, and the Delaware County Advocacy & Resource Organization, hereby certify and attest that:

1. I have made a good faith effort to give all parties affected by the Emergency Motion to Compel Disclosure of Documents and Information Related to the RFP Review Process as much advance notice as reasonably possible.

2. On Wednesday, March 10, 2021, I sent a letter via email informing all counsel of record that later that day, Parent Representatives would be filing an Emergency Motion to Compel Disclosure of Documents and Information Related to the RFP Review Process.

3. I emailed the letter and a copy of the Emergency Motion to all counsel of record at their email addresses on file with the Court:

- a. James R. Flandreau, Esq. and Sean A. Fields Esq. for the Pennsylvania Department of Education (jflandreau@pfblaw.com; sefields@pa.gov)
- b. Robert DiOrio, Esq., Williams A. Jacobs, Esq., Jeffery Sultanik, Esq., and Michele Mintz, Esq. for the Receiver/Chester Upland School District (ajacobs@schusterlaw.com; rdiorio@dioriosereni.com; jsultanik@foxrothschild.com; mmintz@foxrothschild.com)
- c. Rocco P. Imperatrice, III, Esq. and Kathleen O'Connor-Bell, Esq. for Widener Partnership Charter School (rimperatrice@iablegal.com; kbell@iablegal.com)

- d. Kevin M. McKenna, Esq. for Agora Cyber Charter, Chester Charter School for the Arts, Pennsylvania Cyber Charter School, and Commonwealth Connections Academy (kmckenna@mckennalawllc.com)
- e. Francis J. Catania, Esq., James J. Byrne Jr., Esq., and Kevin D. Kent, Esq. for Chester Community Charter School (fjc@fjccp.com; kkent@conradobrien.com; jjbyrne@mbmlawoffice.com)
- f. George Dawson, Esq. and Kenneth R. Schuster, Esq. for The Elected Board of Chester Upland School (gbdlaw@aol.com; ken@schusterlaw.com)
- g. Brian H. Leinhauser, Esq. for Achievement House Cyber Charter School, Pennsylvania Leadership Charter School, and Pennsylvania Distance Learning Charter School (bleinhauser@macmainlaw.com)
- h. Michael Puppio Esq. for Friends of Chester Community Charter School and Chester Charter School For the Arts (puppio@raffaelepuppio.com).

CERTIFIED TO THE COURT BY:

Date: March 10, 2021

/s/ Claudia De Palma

Claudia De Palma

Attorney for Parent Representatives Jazmine Campos, Latoya Jones, Tiffany Raymond, Precious Scott, and the Delaware County Advocacy & Resource Organization

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA
CIVIL DIVISION

IN RE: APPOINTMENT OF A RECEIVER FOR
THE CHESTER UPLAND SCHOOL DISTRICT

CASE NO.: 2012-009781

CERTIFICATE OF SERVICE

I hereby certify that on this date, March 10, 2021, I caused the foregoing Emergency Motion to be served by the means identified below on the following:

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Dated: March 10, 2021

/s/ Claudia De Palma
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Precious Scott, and the Delaware County
Advocacy & Resource Organization