

CI-15-08200

ENTERED AND FILED  
PROTHONOTARY'S OFFICE  
LANCASTER, PA  
\*\*\*Electronically Filed\*\*\*  
Jun 14 2018 10:59AM  
Audrey Conrad

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

ANTONIO MOUNTIS and  
MARIANTHY MOUNTIS,  
Plaintiffs,

v.

CI-15-06424

ARMSTRONG WORLD INDUSTRIES, INC.,  
BRENNTAG NORTHEAST, INC.,  
BARLEY SNYDER, and ALAN J. HAY, M.D.,  
Defendants.

MICHAEL LYNCH and  
CAROLYN LYNCH,  
Plaintiffs,

v.

CI-15-06426

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENNTAG NORTHEAST, INC.,  
Defendants.

JOSE RIVERA,  
Plaintiff,

v.

CI-15-06542

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENNTAG NORTHEAST, INC.,  
Defendants.

DARYL SENSENIG and  
MARY LOU SENSENIG,  
Plaintiffs,

v.

CI-15-06543

ARMSTRONG WORLD INDUSTRIES, INC.,  
BRENNTAG NORTHEAST, INC.,  
BARLEY SNYDER, and ALAN J. HAY, M.D.,  
Defendants.

SHAWN PATTERSON and  
LORI PATTERSON,  
Plaintiffs,

v.

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENN TAG NORTHEAST, INC.,  
Defendants.

---

CI-15-06544

DONALD ROBERTS,  
MARILYN ROBERTS, and  
JASON ROBERTS,  
Plaintiffs,

v.

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENN TAG NORTHEAST, INC.,  
Defendants.

---

CI-15-06546

JUDY WENDLER, in her own right and as  
Administratrix of the Estate of GEORGE  
WENDLER,  
Plaintiffs,

v.

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENN TAG NORTHEAST, INC.,  
Defendants.

---

CI-15-06547

DAVID R. BOYD, JR.,  
Plaintiff,

v.

ARMSTRONG WORLD INDUSTRIES, INC.  
and BRENN TAG NORTHEAST, INC.,  
Defendants.

---

CI-15-06629

SHERRY RILEY, in her own right, and as	:	
Administratrix of the Estate of	:	
JEFFREY L. RILEY,	:	
Plaintiffs,	:	
	:	
v.	:	CI-15-06630

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

BRYAN ALBRIGHT, et al.,	:	
Plaintiffs,	:	
	:	
v.	:	CI-15-07891

ARMSTRONG WORLD INDUSTRIES, INC.	:
JOHN NEID, JAMES BAKER, FRANK	:
GOHL, PATRICK NOLAN, BARNES &	:
THORNBURG, LLP, and BARLEY	:
SNYDER, LLP,	:
Defendants.	:

---

SANDRA COOPER, in her own right and as	:	
Administratrix of the Estate of	:	
GENE M. COOPER,	:	
Plaintiffs,	:	
	:	
v.	:	CI-15-07954

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

SANDRA COOPER, in her own right and as	:	
Administratrix of the Estate of	:	
GENE M. COOPER,	:	
Plaintiffs,	:	
	:	
v.	:	CI-15-08200

BRENNTAG NORTHEAST, INC.,	:
Defendant.	:

---

SANDRA COOPER, DAVID COOPER, and :  
ANN COOPER, :  
Plaintiffs, :  
v. : CI-15-08202

ARMSTRONG WORLD INDUSTRIES, INC., :  
BRENNTAG NORTHEAST, INC., :  
ALAN J. HAY, M.D., and LANCASTER :  
GENERAL OCCUPATIONAL MEDICINE, :  
Defendants. :

JOHN MOELLER, as Administrator of the :  
Estate of MICHAEL MOELLER, :  
Plaintiff, :  
v. : CI-15-08405

ARMSTRONG WORLD INDUSTRIES, INC., :  
Defendant. :

ILDELFONSO SANCHEZ, et al., :  
Plaintiffs, :  
v. : CI-15-08407

ARMSTRONG WORLD INDUSTRIES, INC. :  
and BRENNTAG NORTHEAST, INC., :  
Defendants. :

CHRISTOPHER K. LANDIS :  
Plaintiff, :  
v. : CI-15-08672

BRENNTAG NORTHEAST, INC., :  
Defendants. :

UNITED STEEL WORKERS OF AMERICA, :  
Plaintiff, :  
v. : CI-15-08680

ARMSTRONG WORLD INDUSTRIES, INC., :  
BRENNTAG NORTHEAST, INC., and :  
ALAN J. HAY, M.D., :  
Defendants. :

RAY D. FREDERICK, et al.,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-00788
	:	
ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	
<hr/>		
JEFFERY SAXINGER and	:	
JO ANNE SAXINGER,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-00789
	:	
ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	
<hr/>		
RONALD HOSSLER and	:	
VICKIE J. HOSSLER,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-00790
	:	
ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	
<hr/>		
TODD GRIFFIN,	:	
Plaintiff,	:	
	:	
v.	:	CI-16-00791
	:	
ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	
<hr/>		
UNITED STEEL WORKERS OF AMERICA	:	
LOCAL 285,	:	
Plaintiff,	:	
	:	
v.	:	CI-16-03605
	:	
ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	
<hr/>		

JEFFREY SAXINGER, JOANNE	:	
SAXINGER, and MATTHEW SAXINGER,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-05122

BRENNTAG NORTHEAST, INC.,	:	
ARMSTRONG WORLD INDUSTRIES, INC.,	:	
BARLEY SNYDER, LLP, and	:	
ALAN J. HAY, M.D.,	:	
Defendants.	:	

---

PAUL D. ROGERS and	:	
JUDY ROGERS,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-05583

ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	

---

ANTHONY D. ARCUDI and	:	
MICHELLE ARCUDI,	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-05584

ARMSTRONG WORLD INDUSTRIES, INC.	:	
and BRENNTAG NORTHEAST, INC.,	:	
Defendants.	:	

---

JERRY DENNIS and HELEN DENNIS	:	
Plaintiffs,	:	
	:	
v.	:	CI-16-10110

ARMSTRONG WORLD INDUSTRIES, INC.	:	
BARNES & THORNBURG, LLP,	:	
MORGAN, LEWIS, & BROCKIUS, LLP, and	:	
BARLEY SNYDER, LLP,	:	
Defendants.	:	

---

THE ESTATE OF ROBERT A. WHETTS,	:	
JR., et al.,	:	
Plaintiffs,	:	
v.	:	CI-16-10715

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

MICHAEL K. WALLACE,	:	
Plaintiff,	:	
v.	:	CI-16-10716

ARMSTRONG WORLD INDUSTRIES, INC.,	:
BRENNTAG NORTHEAST, INC.,	:
BARLEY SNYDER, LLP, BARNES &	:
THORNBURG, LLP, and MORGAN LEWIS	:
& BROCKIUS, LLP,	:
Defendants.	:

---

JOSEPH T. DEMASCOLO,	:	
Plaintiff,	:	
v.	:	CI-16-10717

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

RICHARD G. BATES, CAROLE A. BATES,	:	
and STEPHANIE BARKER,	:	
Plaintiffs,	:	
v.	:	CI-16-10961

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

WILLIAM T. FENTON,	:	
Plaintiff,	:	
v.	:	CI-16-10962

ARMSTRONG WORLD INDUSTRIES, INC.	:
and BRENNTAG NORTHEAST, INC.,	:
Defendants.	:

---

JAMES E. ROOP, JR., VICKIE L. ROOP,	:	
JENNIFER A. MILLER, and	:	
SHAWN R. ROOP,	:	
Plaintiffs,	:	
v.	:	CI-16-10963

ARMSTRONG WORLD INDUSTRIES, INC.	:
BRENTAG NORTHEAST, INC.,	:
BARLEY SNYDER, LLP, BARNES &	:
THORNBURG, LLP, and MORGAN LEWIS	:
& BROCKIUS, LLP,	:
Defendants.	:

---

SANDRA COOPER, in her own right, and as	:	
Administratrix of the Estate of	:	
GENE M. COOPER,	:	
Plaintiffs,	:	
v.	:	CI-17-06946

ARMSTRONG WORLD INDUSTRIES, INC.,	:
ALAN J. HAY, M.D., and LANCASTER	:
GENERAL OCCUPATIONAL MEDECINE,	:
Defendants.	:

---

CHRISTOPHER K. LANDIS,	:	
Plaintiff,	:	
v.	:	CI-17-09152

ARMSTRONG WORLD INDUSTRIES, INC.,	:
Defendant.	:

---

### **RULE**

AND NOW, this 14<sup>th</sup> day of June 2018, the court issues a rule on Attorney George P. Chada individually to show cause why he should not be disqualified as counsel in all the above captioned cases to ensure the parties receive the fair trial that due process requires, because of his frequent, flagrant, and continuing violations of the Pennsylvania Rules of Professional Conduct:

<u><b>Date</b></u>	<u><b>Case</b></u>	<u><b>Conduct</b></u>
1. 2017-10-16	15-06424	The court entered an order granting Dr. Hay's motion for sanctions because Chada added Dr. Hay as a defendant without consent of the adverse parties or leave of court, violating Pa. R.C.P. 1033,



when plaintiffs did not have standing to sue Dr. Hay and Chada knew it, and the claims for negligent entrustment and breach of confidentiality were neither legally warranted nor supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

2. 2017-11-09 15-06424 Pursuant to the court's September 14, 2017, opinion and order on preliminary objections, Chada filed a second amended complaint on September 27, 2017. But on October 16, 2017, he filed a praecipe to substitute it with an amended second amended complaint. On October 18, 2017, Brenntag moved for a protective order. After the defendants filed preliminary objections on October 18 and 19, 2017, Chada filed a third amended complaint on October 24, 2017. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 16 and 24, 2017, complaints; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
3. 2018-01-25 15-06424 Chada filed a response to the court's rule on December 26, 2017, directing him to show cause why sanctions should not be imposed. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
4. 2018-03-22 15-06424 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$2,067.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

5. 2018-06-05 15-06424 On December 14, 2017, the court entered an opinion and order on preliminary objections. Armstrong filed an answer with new matter on January 19, 2018. On February 17, 2018, Chada filed a response to Armstrong's new matter that contained impertinent allegations that the court's previous orders had limited or prohibited. On March 9, 2018, Armstrong filed a motion to strike and for sanctions. On June 5, 2018, the court entered an order striking the response and granting sanctions. The court noted Chada "failed to include a verification in conformity with Pa. R.C.P. 1024(a)," failed to comply with the court's previous opinions and orders, misrepresented the findings of a worker's compensation judge, and violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
6. 2017-11-09 15-06426 Pursuant to the court's September 18, 2017, order, Chada filed a second amended complaint on October 20, 2017. But on October 21, 2017, he filed another second amended complaint. On November 9, 2017, Brenntag moved for a protective order. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 21, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Plaintiffs' counsel's repeat[ed] filings—in this matter and the other similarly situated cases—are outside the procedures envisioned by the Pennsylvania Rules and harassing and unduly burdensome on the defendants." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
7. 2018-01-25 15-06426 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1033; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
8. 2018-03-22 15-06426 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$1,474.50 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must

- examine in determining the amount of fees and costs ....” See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
9. 2018-06-07 15-06426 Brenntag filed a motion for sanctions based on Chada’s alleged violation of Pa. R.C.P. 1023.1.
- 
10. 2018-05-14 15-06542 On March 26, 2018, Chada filed a motion for leave to file a response to “Armstrong World Industries, Inc.’s Motion to Strike ... and Impose Sanctions.” However, Armstrong had not filed a motion to strike or for sanctions on this docket number. On March 29, 2018, Armstrong filed a brief in opposition to Chada’s March 26 motion and requested sanctions. However, Armstrong’s March 29 filing did not contain a motion for sanctions. See Pa. R.C.P. 1023.2 (“An application for sanctions under this rule shall be made by motion, shall be made separately from other applications and shall describe the specific conduct alleged to violate Rule 1023.1(c).”) Instead, Armstrong argued in its brief that the court should, on its own initiative, enter a rule to show cause why Chada had not violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.3 (“On its own initiative, the court may enter an order describing the specific conduct that appears to violate Rule 1023.1(c) and directing an attorney, law firm or party to show cause why it has not violated Rule 1023.1(c) ....”). On April 2, 2018, the court denied Chada’s motion.
- On April 19, 2018, the twenty-first day after Armstrong’s March 29 filing, Chada filed a praecipe to withdraw his March 26 motion, even though the court had already decided it on April 2. On April 27, 2018, Chada filed a motion for leave to file a response to Armstrong’s March 29 argument for sanctions in its brief. The twenty-eight-day time limit for withdrawing a document in Pa. R.C.P. 1023.2(b) did not apply because Armstrong’s March 29 filing did not contain a certification or a written notice of demand for Chada to withdraw his March 26 filing. “Within twenty days after service of the moving party’s motion and brief, any party opposing the motion shall file a responsive brief, together with any opposing affidavits, depositions, transcripts or other documents. Any party who fails to file a responsive brief shall be deemed not to oppose the motion.” L.C.R.C.P. 208.3(b)(B). “The moving party may file a brief in reply to the responsive brief within five days after service of a responsive brief.” L.C.R.C.P. 208.3(b)(C). Regardless of whether Armstrong’s March 29 filing was characterized as a motion for sanctions with a twenty-day limit for a responsive brief under L.C.R.C.P. 208.3(b)(B), or a responsive brief to plaintiff’s March 26 motion with a five-day limit for a reply brief under L.C.R.C.P. 208.3(b)(C), Chada did not file either

- (1) his April 19 praecipe to withdraw, or (2) his April 27 motion within the time limit. Therefore, on May 14, 2018, the court issued a rule on Chada individually to show cause why he has not violated Pa. R.C.P. 1023.1 for filing his March 26, 2018, motion. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
11. 2018-06-11 15-06542 The court's May 14, 2018, rule was returnable in writing by filing an answer, if any, by June 4, 2018. As of June 11, 2018, Chada had not filed an answer. See Pa. R.P.C. 1.1.
- 
12. 2017-10-16 15-06543 The court entered an order granting Dr. Hay's motion for sanctions because Chada added Dr. Hay as a defendant without consent of the adverse parties or leave of court, violating Pa. R.C.P. 1033, when plaintiffs did not have standing to sue Dr. Hay and Chada knew it, and the claims for negligent entrustment and breach of confidentiality were neither legally warranted nor supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
13. 2017-11-09 15-06543 Pursuant to the court's September 14, 2017, opinion and order on preliminary objections, Chada filed a second amended complaint on September 29, 2017. But on October 17, 2017, he filed a praecipe to substitute it with an amended second amended complaint. On October 18, 2017, Brenntag moved for a protective order. After the defendants filed preliminary objections on October 18 and 19, 2017, he filed a third amended complaint on October 23, 2017. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 17 and 23, 2017, complaints; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
14. 2018-01-25 15-06543 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order

- granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
15. 2018-03-22 15-06543 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$1,891.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
16. 2018-06-11 15-06543 On April 25, 2018, Brenntag filed a motion for judgment on the pleadings and brief in support. On May 1, 2018, Chada filed a motion for leave to file a response to Brenntag's motion. The court entered an order on May 14, 2018, granting Chada's motion and stating "[a]ny such reply shall be filed within twenty (20) days of this order." As of June 11, 2018, which was beyond the time limit, Chada had not filed a response. See Pa. R.P.C. 1.1.
17. 2018-06-11 15-06543 On April 25, 2018, Brenntag filed a motion for sanctions and brief in support. On May 1, 2018, Chada filed a motion for leave to file a response to Brenntag's motion. The court entered an order on May 14, 2018, granting Chada's motion and stating "[a]ny such reply shall be filed within twenty (20) days of this order." As of June 11, 2018, which was beyond the time limit, Chada had not filed a response. See Pa. R.P.C. 1.1.
- 
18. 2017-11-09 15-06546 Pursuant to the court's September 18, 2017, order, Chada filed a second amended complaint on October 16, 2017. But on October 27, 2017, he filed a third amended complaint. On November 6, 2017, Brenntag moved for a protective order. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 27, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Plaintiffs' counsel's repeat[ed] filings—in this matter and the other similarly situated cases—are outside the procedures envisioned by the Pennsylvania Rules and harassing and unduly burdensome on the defendants." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
19. 2018-01-25 15-06546 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag,

- CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
20. 2018-03-22 15-06546 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$2,335.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
21. 2018-06-04 15-06546 Brenntag filed a motion for sanctions based on Chada's alleged violation of Pa. R.C.P. 1023.1.
- 
22. 2017-11-09 15-06547 Pursuant to the court's September 18, 2017, order, Chada filed a second amended complaint on October 17, 2017. But on October 28, 2017, he filed a third amended complaint. On November 6, 2017, Brenntag moved for a protective order, and the defendants filed preliminary objections. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 28, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Plaintiffs' counsel's repeat[ed] filings—in this matter and the other similarly situated cases—are outside the procedures envisioned by the Pennsylvania Rules and harassing and unduly burdensome on the defendants." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
23. 2018-01-25 15-06547 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
24. 2018-03-22 15-06547 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$648.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has

- failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ....” See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
25. 2018-05-14 15-06547 On March 29, 2018, Brenntag filed a motion for sanctions based on Chada’s alleged violation of Pa. R.C.P. 1023.1. On April 26, 2018, Chada filed a motion for leave to file a response to Brenntag’s motion. The court entered an order on May 14, 2018, denying Chada’s motion, stating: “Brenntag filed its motion for sanctions on March 29, 2018. ‘Within twenty days after service of the moving party’s motion and brief, any party opposing the motion shall file a responsive brief, together with any opposing affidavits, depositions, transcripts or other documents. Any party who fails to file a responsive brief shall be deemed not to oppose the motion.’ L.C.R.C.P. 208.3(b)(B). Plaintiffs filed their motion on April 26, 2018. Therefore, plaintiffs did not file their motion within the time limit.” See Pa. R.P.C. 1.1.
26. 2018-06-05 15-06547 On December 8, 2017, the court entered an order on preliminary objections. Armstrong filed an answer with new matter on January 19, 2018. On February 17, 2018, Chada filed a response to Armstrong’s new matter that contained impertinent allegations that the court’s previous orders had limited or prohibited. On March 9, 2018, Armstrong filed a motion to strike and for sanctions. On June 5, 2018, the court entered an order striking the response and granting sanctions. The court noted Chada “failed to include a verification in conformity with Pa. R.C.P. 1024(a),” failed to comply with the court’s previous opinions and orders, misrepresented the findings of a worker’s compensation judge, and violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
27. 2017-10-17 15-06630 On August 4, 2017, Brenntag filed a motion for sanctions against Chada individually. On October 17, 2017, the court entered an order granting sanctions against him individually for violating Pa. R.C.P. 1023.1. The court’s order stated: “Any claims in the nature of survival or wrongful death are dismissed with prejudice[ ], and plaintiffs are directed not to include such claims in their amended complaint” because “Attorney Chada knew or should have known that any such claims were without legal warrant.” See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
28. 2017-11-22 15-06630 On October 20, 2017, Chada filed a second amended complaint. On November 22, 2017, Brenntag filed a renewed motion for sanctions, alleging that despite the court’s October 17, 2017, order, Chada “nevertheless included in Plaintiff’s second amended complaint so-called strict product liability and negligence claims relating to the alleged injuries and death of Plaintiff’s decedent,

- having simply eliminated the ‘wrongful death’ and ‘survival’ action designations,” even though “they cannot be asserted outside the context of a wrongful death claim or a survival claim.” In addition, Brenntag alleged that despite the court’s September 14 and 18, 2017, orders to the contrary, “Chada nevertheless included an intentional spoliation claim in Plaintiff’s second amended complaint.” See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
29. 2018-01-05 15-06630 Brenntag filed a supplemental brief in support of its renewed motion for sanctions. Brenntag argued that because Chada failed to file a response or brief in opposition to its renewed motion for sanctions, under L.C.R.C.P. 208.3(b)(B), the court should deem the motion unopposed. See Pa. R.P.C. 1.1.
- 
30. 2017-10-17 15-07891 On March 2, 2016, Barnes & Thornburg LLP filed a motion for sanctions. On October 17, 2017, the court entered an order granting sanctions under Pa. R.C.P. 1023.1 because the “claims for fraud by intentional misrepresentation and fraud by intentional nondisclosure ... [we]re without legal warrant.” See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
31. 2017-10-17 15-07954 On August 1, 2017, Brenntag filed a motion for sanctions against Chada individually. On October 17, 2017, the court entered an order granting sanctions against him individually for violating Pa. R.C.P. 1023 and 1033 by adding Brenntag as a defendant to an amended complaint without consent of the parties or leave of court, and because he “knew or should have known that the claim for spoliation advanced against BNI in the amended complaint was not recognized under Pennsylvania law.” See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
32. 2017-12-14 15-07954 On December 14, 2017, Brenntag filed a renewed motion for sanctions, alleging that on October 27, 2017, Chada filed another amended complaint without consent of the parties or leave of court, and again naming Brenntag as a defendant and pleading an intentional spoliation claim. Therefore, Brenntag asserted Chada violated Pa. R.C.P. 1023.1, and was in contempt of the court’s prior orders. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
33. 2017-10-17 15-08200 On November 25, 2014, Chada filed a third amended complaint. Before the Philadelphia Court of Common Pleas transferred the case to this court, Brenntag filed three motions for summary judgment. After the Philadelphia Court of Common Pleas transferred the case, Brenntag filed renewed motions for summary



judgment. On October 4, 2017, Chada filed a fourth amended complaint without consent of the parties or leave of court. On October 12, 2017, Brenntag filed preliminary objections to the fourth amended complaint. On October 13, 2017, the court entered an opinion and order granting summary judgment in favor of Brenntag, and dismissing the third amended complaint with prejudice. On October 13, 2017, Chada filed a response to Brenntag's preliminary objections. On October 17, 2017, the court entered an order sustaining Brenntag's preliminary objections and dismissing the fourth amended complaint with prejudice because Chada violated Pa. R.C.P. 1033 by filing it without consent of the parties or leave of court. See Pa. R.C.P. 1033; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

34. 2018-01-12 15-08200 On April 13, 2017, Brenntag filed a motion for sanctions, alleging Chada violated Pa. R.C.P. 1023.1 by claiming plaintiff was injured on September 25, 2003, by trichloroethylene ("TCE") fumes from a "Safety Solvent" that Brenntag manufactured and supplied to Armstrong. Brenntag alleged Chada knew or had reason to know that Brenntag neither manufactured nor sold Safety Solvent, and furthermore, that on September 25, 2003, Armstrong used a product called Solvesso that was manufactured by a different company. On October 18, 2017, the court issued a rule for Chada to show cause why sanctions should not be granted. Chada filed a response to the court's rule on October 31, 2017. The court held a hearing on December 28, 2017. On January 12, 2018, the court entered an opinion and order granting sanctions, finding that Chada did not have a reasonable basis for advancing the position that Brenntag manufactured or distributed a product called Safety Solvent that injured plaintiff on September 25, 2003. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

35. 2018-03-20 15-08200 Brenntag filed a fee petition on February 12, 2018. Chada filed a motion for leave to file a response on March 2, 2018. On March 20, 2018, the court entered an order awarding \$101,294.23 in fees and costs against Chada individually. The court stated: "Despite the court's directive for Attorney Chada to file his response to BNI's fee petition within fourteen (14) days after BNI's petition was filed, Attorney Chada instead filed a 'Motion for Leave to File Plaintiffs' Opposition to Defendant, Brenntag Northeast, Inc.'s Petition for Attorneys' Fees and Costs.' Attached to the motion as Exhibit 1 is a document entitled 'Plaintiffs Opposition to Defendant, Brenntag Northeast, Inc.'s Petition for Attorneys' Fees and Costs.' Attorney Chada's response attempt to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining

the amount of fees and costs .... He instead attempts to relitigate whether or not the court should have granted BNI's motion for sanctions. The court is at a loss to understand why Attorney Chada would not directly respond to a request for over \$100,000 in fees and costs." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

36. 2018-05-21 15-08200 On May 8, 2018, Chada filed a motion for leave to file a petition for stay and protective order. He attached as Exhibit 1 an April 24, 2018, notice of deposition for Brenntag to depose him on May 9, 2018, accompanied by all his personal federal and state tax returns for 2005 to 2017, bank and investment account information, real estate ownership information, and records relating to assets worth more than \$500.

On May 14, 2018, at 11:41 a.m., Brenntag filed a motion to compel Chada's appearance at a deposition it noticed for May 25, 2018, at 10:00 a.m., and for the court to award sanctions against him for failing to appear at his May 9, 2018, deposition. Brenntag attached as Exhibit D a certification of Brenntag's counsel, which in turn attached (1) an April 24, 2018, letter from Brenntag's counsel to Chada; and (2) May 3 and May 8, 2018, emails from Brenntag's counsel to him. The April 24, 2018, letter demanded Chada pay Brenntag's counsel \$123,599.73 by April 27, 2018, to satisfy the judgments against him for sanctions the court awarded in fourteen cases. It also enclosed Brenntag's notice of deposition in aid of execution for May 9, 2018. The May 3, 2018, email asked Chada to confirm his attendance at the deposition and attached a copy of the notice of deposition. The May 8, 2018, email again asked him to confirm, and also asked him to list alternative dates if he was not able to attend on May 9, 2018. Finally, Brenntag attached as Exhibit F a copy of the transcript from the May 9, 2018, deposition, which indicates Chada failed to appear.

The court did not grant Chada leave to file a petition for stay and protective order until May 14, 2018, at 2:11 p.m. Chada filed a petition for stay and protective order on May 17, 2018, at 10:15 a.m. In sum, beginning on April 24, 2018, Brenntag sent Chada a letter, a notice of deposition, and two emails about the deposition, but on the day before it was scheduled to occur, Chada filed a motion for leave to file a petition for stay and protective order, and then failed to appear at the deposition, even though the court had not yet granted him leave to file a petition for stay and protective order, nor considered the merits of one that had not been filed, nor granted or denied it.

The court's May 14, 2018, order entered at 2:11 p.m. also required plaintiffs to file any response to Brenntag's motion to compel by May 17, 2018. But instead of filing a response to Brenntag's motion to compel, at 8:03 p.m. on the day of the deadline, Chada filed a motion to enlarge the time for a response. Chada made three arguments, but as the court explained in its May 18, 2018, order, all of them were frivolous because they lacked an arguable basis in law or fact. See Neitzke v. Williams, 490 U.S. 319, 325 (1989) (stating a frivolous action or proceeding is one that "lacks an arguable basis either in law or in fact").

The court therefore denied the motion to enlarge time, and granted Brenntag's motion to compel Chada's deposition on May 25, 2018, at 10:00 a.m. at the law office of Barley Snyder, 126 East King Street, Lancaster, PA 17602. That address is about one block from the Lancaster County Courthouse. The court denied without prejudice Brenntag's motion for sanctions against Chada individually for his failure to appear for a noticed deposition on May 9, 2018, at 10:00 a.m., and instead stated that if necessary, Brenntag could file a petition to assess post-judgment discovery expenses pursuant to Pa. R.C.P. 3117(b).

Finally, the court denied Chada's petition for stay or for a protective order. In his petition, Chada purported to quote the following language from Vaccone v. Syken, 899 A.2d 1103, 1106 (Pa. 2006): "For an automatic stay to be imposed, an order must be final, interlocutory as of right, or qualify as a collateral order. See Pa. R.A.P. §§ 311, 313, 341." Pls.' Br. in Supp. at 2. However, Vaccone does not contain that quotation—it does not even contain the word "automatic," or the word "stay." Chada therefore made a false representation to this court.

The only other authority Chada cited was Pa. R.A.P. 341, which he purported to cite for the proposition that it imposes an automatic stay: "Whether this Court may enforce the stay imposed by Pa. R.A.P. 341." Pls.' Br. in Supp. at 1. "This Court may enforce the automatic stay imposed by Pa. R.A.P. 341." Id. at 2. "An automatic stay is imposed pursuant to Pa. R.A.P. 341." Id. However, these are false representations to the court. Rule 341 defines a "final order," and contains the word "stay" only once, in subsection (c)(1), which concerns a determination of finality regarding fewer than all of the claims and parties in an action, not an automatic stay outside the context of a pending application for a determination of finality. See Pa. R.A.P. 341(c)(1). Furthermore, Chada did not cite any of the applicable rules, nor meet their

- requirements under Pa. R.A.P. 1731, 1733, or 1736. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
37. 2018-06-07 15-08200 On May 29, 2018, Brenntag filed a second motion to compel Chada's deposition in aid of execution on Friday, June 8, 2018, at 10:00 a.m. at the law office of Barley Snyder, 126 East King Street, Lancaster, PA 17602, because Chada failed to appear for the May 25, 2018, deposition that the court had ordered. That address is about one block from the Lancaster County Courthouse. On May 22, 2018, at 5:30 p.m., Chada sent an email to Brenntag's counsel, stating: "To avoid any additional expenses, Plaintiffs intend to appeal from the Order entered May 21, 2018, in 15-08200 on or before May 25, 2018. Therefore, do not schedule a reporter or reserve the date." However, Chada never filed an appeal of the May 21 order. On June 6, 2018, at 3:42 p.m., Chada filed a motion for leave to file a response to Brenntag's second motion to compel. On June 6, 2018, at 4:46 p.m., the court entered an order requiring Chada to file any response by June 7, 2018, at 5:00 p.m., scheduling a hearing on Brenntag's second motion to compel for June 8, 2018, at 8:30 a.m., and requiring that Chada attend the hearing in person. Instead of filing a response, on June 7, 2018, at 3:45 p.m., Chada filed another motion for leave to file a response. On June 7, 2018, at 5:30 p.m., the court entered an order denying Chada's motion for leave filed on June 7, 2018, at 3:45 p.m., and characterizing it as the response he was allowed to file under the court's order filed on June 6, 2018, at 4:46 p.m. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
38. 2018-06-08 15-08200 The court held a hearing on Brenntag's second motion to compel on Friday, June 8, 2018, at 8:30 a.m. Chada claimed he was representing the plaintiffs at the hearing, even though the purpose of the hearing was to consider Brenntag's second motion to compel against him individually, not against the plaintiffs. Chada equivocated in response to the question whether he was representing himself at the hearing, or whether Todd M. Mosser, Esq., was representing him, even though Mosser was not present. Thus, Chada was not candid with the court.

When responding to the court's questions about why he failed to appear at his first and second depositions, Chada claimed he needed time to get the money together to post the security needed to obtain an automatic stay under Pa. R.A.P. 1731, and he referred to an account as one of his "operating" accounts. Although the court's March 20, 2018, order imposed a \$101,294.23 sanction against Attorney Chada individually, and the court gave Attorney Chada until noon on June 8, 2018, to (1) pay security into court in the amount of 120 percent of the amount due in this case and the related cases in accordance with Pa. R.A.P. 1731; (2) appear for a

deposition in aid of execution in this case and the related cases at Barley Snyder LLP at 126 East King Street, Lancaster, PA 17602; or (3) be subject to a bench warrant for his arrest, the \$159,528.64 security paid into court on June 8, 2018, at 9:39 a.m. in this case and the related cases was paid by Attorney Chada's client Sandra L. Cooper, not Attorney Chada himself. On the check and receipt from the Prothonotary, Sandra L. Cooper is listed on Wells Fargo Bank, N.A. Cashier's Check #6802901073 as the remitter, and on Lancaster County Prothonotary Receipt #672633 as the person from whom the check was received. The context of Chada's discussion of one of his "operating" accounts, combined with the proximity in time with which his client Sandra L. Cooper paid money into court on his behalf, creates a strong inference that Chada referred to his client's account as one of his operating accounts.

39. 2018-06-08 15-08200 See Pa. R.P.C. 1.1; 1.7; 1.8; 1.15; 3.1; 3.2; 3.3; 5.3; 8.4. The total amount of sanctions the court entered against Chada on March 20 and 22, 2018, was \$126,434.23. To obtain an automatic supersedeas under Pa. R.A.P. 1731, 120 percent of the amount due must be filed with the Prothonotary. In this case, 120 percent of \$126,434.23 would have been \$151,721.08. But instead of filing 120 percent, in his June 6 and 7, 2018, filings, Chada asserted, without supporting calculations or explanations, the amount necessary was \$159,528.64. On June 8, 2018, his client Sandra L. Cooper paid \$159,528.64 into court, which was \$7,807.56 more than necessary. Although 42 Pa. C.S. § 8101 states judgments shall bear interest at the legal rate, and 41 P.S. § 202 sets the legal rate at 6 percent, even if the interest was calculated on the \$151,721.08 amount instead of the actual amounts of the judgments, the per diem interest would be only \$24.94. Approximately 80 days elapsed between entry of the judgments and June 8, 2018, which would make the amount of accrued interest \$1,995.20. Therefore, it appears Chada's calculation was erroneous, and he not only had his client Sandra L. Cooper pay on his behalf, but also had her pay too much. See Pa. R.P.C. 1.1.

- 
40. 2018-01-03 15-08202 On October 6, 2017, Chada filed a third amended complaint. On December 6, 2017, the court entered an opinion and order sustaining Dr. Hay's preliminary objections and dismissing the third amended complaint with prejudice. On January 3, 2018, Dr. Hay filed a motion for sanctions against Chada individually, alleging he violated Pa. R.C.P. 1023.1 by making claims that were barred by claim preclusion, were not recognized as private causes of action by Pennsylvania law, were not supported by evidence,

and were violations of prior court orders. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

---

41. 2017-11-08 15-08672 On December 22, 2014, Chada filed a third amended complaint before the Philadelphia Court of Common Pleas transferred the case to this court. On October 2, 2017, Chada filed a fourth amended complaint. Brenntag filed preliminary objections on October 12, 2017. On October 18, 2017, Chada filed a praecipe to withdraw the fourth amended complaint. Chada claimed he filed the fourth amended complaint pursuant to the court's August 25, 2017, order, but that order did not grant leave to file an amended pleading in this matter. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
42. 2018-06-04 15-08672 On December 15, 2017, Brenntag filed a motion for reconsideration of the January 15, 2015, order granting Chada's motion to consolidate the case with Landis v. Armstrong, CI-17-09152. Brenntag asserted that Chada failed to identify the correct judge on the cover sheet of the motion to consolidate, because the assigned judge had denied a similar motion two weeks before, and he sought to consolidate the cases to obtain an extension of the discovery deadline, which was less than one month away, in an end run around the case management order and rules of civil procedure. In his February 21, 2018, response, Chada argued the coordinate jurisdiction rule prohibited this court from vacating the consolidation, but the coordinate jurisdiction rule does not apply to motions for reconsideration. On June 4, 2018, the court entered an order granting reconsideration and vacating the consolidation order. The court noted that "although plaintiff refers in his motion to an 'order that requires complaints to conform to the model cases,' the court filed no such order on this docket." See Pa. R.P.C. 3.1; 3.2; 3.3; 8.4.
- 
43. 2017-10-17 15-08680 The court entered an order granting Dr. Hay's motion for sanctions because Chada filed the third amended complaint without leave of court; added Dr. Hay as a defendant without consent of the adverse parties or leave of court, violating Pa. R.C.P. 1033; and the claims for negligent entrustment and breach of confidentiality were neither legally warranted nor supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
44. 2017-11-09 15-08680 Pursuant to the court's September 20, 2017, order on preliminary objections, Chada filed another amended complaint on October 11, 2017. But on November 2, 2017, filed yet another amended complaint without consent of the adverse parties or leave of court. On November 10, 2017, Brenntag moved for a protective order. On November 14, 2017, the court granted Brenntag's motion for a

- protective order; struck the November 2, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
45. 2018-01-25 15-08680 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
46. 2018-03-20 15-08680 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 20, 2018, the court entered an order awarding \$2,672.50 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
47. 2017-10-16 16-00789 The court entered an order granting Dr. Hay's motion for sanctions because Chada added Dr. Hay as a defendant without consent of the adverse parties or leave of court, violating Pa. R.C.P. 1033, when plaintiffs did not have standing to sue Dr. Hay and Chada knew it, and the claims for negligent entrustment and breach of confidentiality were neither legally warranted nor supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
48. 2017-11-13 16-00789 Pursuant to the court's September 14, 2017, opinion and order on preliminary objections, Chada filed a second amended complaint on October 1, 2017. But on October 2, 2017, he filed a praecipe to disregard it, and filed another second amended complaint. On October 15, 2017, he filed a praecipe to substitute the October 2

- complaint with an yet another amended second amended complaint. On October 18, 2017, Brenntag moved for a protective order. The defendants filed preliminary objections on October 18 and 23, 2017. On November 13, 2017, the court granted Brenntag's motion for a protective order; struck the October 15, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Plaintiffs' counsel's repeat[ed] filings—in this matter and the other similarly situated cases—are outside the procedures envisioned by the Pennsylvania Rules and harassing and unduly burdensome on the defendants." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
49. 2018-01-25 16-00789 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
50. 2018-03-22 16-00789 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$3,518.50 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
51. 2018-06-05 16-00789 Armstrong filed an answer with new matter on January 19, 2018. On February 17, 2018, Chada filed a response to Armstrong's new matter that contained impertinent allegations that the court's previous orders had limited or prohibited. On March 9, 2018, Armstrong filed a motion to strike and for sanctions. On June 5, 2018, the court entered an order striking the response and granting sanctions. The court noted Chada "failed to include a verification in conformity with Pa. R.C.P. 1024(a)," failed to comply with the court's previous opinions and orders, misrepresented the findings of a worker's compensation judge, and violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
52. 2017-02-07 16-03605 On April 25, 2016, Chada commenced the action by writ of summons. On May 11, defendants filed a praecipe to rule Chada



- to file a complaint. Chada responded to the praecipe on May 23, 2016, by filing a one-hundred-seventeen-page document titled “L.R. 206.7 Answer to Defendant, Barley Snyder, LLP’s Rule to Show Cause and Petition to Enlarge the Time to File a Complaint,” claiming he could not file a complaint until after the resolution of a worker’s compensation claim that involved only one of the one hundred plaintiffs in the action. Chada asserted this was necessary because the findings in the worker’s compensation action would have a claim preclusive effect on this action. On June 9, 2016, Chada filed a motion for pre-complaint discovery, but failed to serve it on Barnes & Thornburg LLP’s counsel, and failed to file a brief in support of the motion. On September 13, 2016, Chada filed a second motion for pre-complaint discovery and a brief in support, but again failed to serve counsel for Barnes & Thornburg. On November 11, 2016, Barnes & Thornburg moved for sanctions, arguing Chada’s conduct was dilatory, obdurate, and vexatious because he failed to write in complete sentences, make intelligible arguments, and follow the rules of civil procedure. On February 7, 2017, the Prothonotary entered a judgment of *non pros* against plaintiffs for Chada’s failure to file a complaint. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
53. 2017-10-17 16-03605 On January 29, 2017, Chada filed a motion to find Barnes & Thornburg in contempt of a stay he asserted the court entered by orders on January 6 and 20, 2017. On October 17, 2017, the court denied Chada’s motion because no such orders appeared on the docket, and the court had not stayed the action until May 25, 2017. See Pa. R.P.C. 1.1.
54. 2017-12-21 16-03605 On October 10, 2017, Chada filed a complaint. Brenntag filed preliminary objections on December 12, 2017. On December 21, 2017, Brenntag filed a motion for sanctions, alleging Chada violated Pa. R.C.P. 1023.1 by pleading a cause of action and facts that were identical to a prior pending action, not recognized under Pennsylvania law, violated prior court orders, and not supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
55. 2018-06-11 16-03605 On January 22, 2018, Chada filed a motion for leave to file a response to Brenntag’s December 12, 2017, preliminary objections. On February 16, 2018, the court entered an order granting Chada leave to file a response within twenty days. As of June 11, 2018, which was beyond the time limit, Chada had not filed a response. See Pa. R.P.C. 1.1.
- 
56. 2017-10-16 16-05122 The court entered an order granting Dr. Hay’s motion for sanctions because Chada added Dr. Hay as a defendant without consent of the adverse parties or leave of court, violating Pa. R.C.P. 1033,

- when plaintiffs did not have standing to sue Dr. Hay and Chada knew it, and the claims for negligent entrustment and breach of confidentiality were neither legally warranted nor supported by evidence. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
57. 2017-11-09 16-05122 On September 14, 2017, the court entered an opinion and order on preliminary objections, dismissing Armstrong with prejudice and requiring Brenntag to file an answer to the complaint within twenty days. But on October 1, 2017, Chada filed a second amended complaint that again named Armstrong as a defendant. On October 4, 2017, Brenntag filed an answer with new matter. On the same day, Chada filed a praecipe to disregard the second amended complaint, and then filed an answer to Brenntag's new matter. Nevertheless, on October 15, 2017, Chada filed a praecipe to substitute it with an amended second amended complaint. On October 18, 2017, Brenntag moved for a protective order. On October 23, 2017, Armstrong moved to find Chada in contempt. On October 25, 2017, Chada filed a third amended complaint. On November 13, 2017, the court granted Brenntag's motion for a protective order; struck the October 1, 15, and 25, 2017, complaints; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause "why he should not be held in contempt for filing three complaints without leave of court or consent of the other parties, for including in these complaints parties previously dismissed by this court, and why monetary sanctions should not be imposed." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
58. 2018-01-25 16-05122 Chada did not file a response to the rule. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag and Armstrong's requests for monetary sanctions. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
59. 2018-03-22 16-05122 Brenntag filed a fee petition on February 21, 2018. Armstrong filed a fee petition on February 23, 2018. Chada filed a response to Brenntag's petition on March 7, 2018, and to Armstrong's petition on March 14, 2018. On March 22, 2018, the court entered orders awarding \$2,653.00 in fees and costs against Chada individually on Brenntag's petition, and \$1,910.00 on Armstrong's petition. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in

- determining the amount of fees and costs ....” See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
60. 2018-05-23 16-05122 Chada obtained Todd M. Mosser, Esq., as counsel, and Mosser filed a notice of appeal on Chada’s behalf from the court’s March 22, 2018, sanctions orders. Mosser filed a statement of errors complained of on appeal on May 15, 2018. But on May 23, 2018, Mosser filed an “Application to Withdraw, Dismiss, and Close the Instant Appeal” on docket 672 MDA 2018, stating: “The instant appeal was filed in error, as it was from an order that was one in a series of thirteen orders in related cases involving the imposition of sanctions on prior counsel.... Having conferred with prior counsel (Mr. Chada), he and the undersigned have concluded that an appeal in this matter would be meritless.” See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
61. 2018-06-07 16-05583 Pursuant to the court’s September 18, 2017, order, Chada filed an amended complaint on October 24, 2017. Brenntag and Armstrong filed preliminary objections on November 13, 2017. On February 1, 2018, the court entered an order on preliminary objections, striking with prejudice paragraphs related to intentional spoliation and a count for fraud, specifically instructing Chada to not include those claims when re-pleading, and granting Chada leave to file an amended complaint by March 2, 2018. Nevertheless, Chada filed a third amended complaint on February 4, 2018, that included both the spoliation paragraphs and the count for fraud. Brenntag filed preliminary objections on February 13, 2018, and Armstrong filed preliminary objections on February 26, 2018. On June 4, 2018, the court entered an order on preliminary objections, requiring Brenntag and Armstrong to file answers to the third amended complaint by June 25, 2018. The court noted: “In its Prior Order, the court dismissed with prejudice plaintiffs’ claim for intentional spoliation. Plaintiffs cannot simply recapitulate that claim here by not giving it a count number, nor is this complaint an appropriate avenue for requesting discovery sanctions. Furthermore, the court previously sustained objections to identical paragraphs in a prior order dated February 1, 2018.” Despite the court awarding sanctions of approximately \$25,140.00 against Chada individually on March 20 and 22, 2018, related to his repeated filing of amended complaints without consent of adverse parties or leave of court, on June 7, 2018, Chada filed a fourth amended complaint without consent of adverse parties or leave of court. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
-

62. 2018-06-04 16-05584 On June 4, 2018, Brenntag filed a motion for sanctions, alleging Chada violated Pa. R.C.P. 1023.1 by filing the complaint and amended complaint, when he knew or should have known the statute of limitations had run no later than in 2008. See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 8.4.

---

63. 2018-06-05 16-10715 On September 20, 2017, the court entered an order explaining how Chada misrepresented the findings of a worker's compensation judge. On December 7, 2017, the court entered an order on preliminary objections. Armstrong filed an answer with new matter on January 18, 2018. On February 17, 2018, Chada filed a response to Armstrong's new matter that contained impertinent allegations that the court's previous orders had limited or prohibited. On March 9, 2018, Armstrong filed a motion to strike and for sanctions. On June 5, 2018, the court entered an order striking the response and granting sanctions. The court noted Chada "failed to include a verification in conformity with Pa. R.C.P. 1024(a)," failed to comply with the court's previous opinions and orders, misrepresented the findings of a worker's compensation judge, and violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

---

64. 2017-11-28 16-10716 Pursuant to the court's September 20, 2017, order, Chada filed a complaint on October 10, 2017. Brenntag and Armstrong filed preliminary objections on October 30, 2017. Chada filed an amended complaint on November 4, 2017. On November 27, 2017, Brenntag moved for a protective order. On November 28, 2017, the court granted Brenntag's motion for a protective order; struck the November 4, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "While this complaint was filed pursuant to Pa. R.C.P. 1028(c)(1), it failed to respond in any meaningful way to defendants' preliminary objections. In fact, it appears identical to the October 10, 2017 complaint. Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

65. 2018-01-25 16-10716 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
66. 2018-03-22 16-10716 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$730.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
67. 2018-05-14 16-10716 On February 23, 2018, the court entered an order on preliminary objections, requiring Chada to file an amended complaint by March 23, 2018. Chada failed to file an amended complaint. On May 4, 2018, Armstrong filed a motion for judgment of *non pros* under Pa. R.C.P. 1037(c). On May 10, 2018, Chada filed a motion for leave to file a second amended complaint, claiming that he had mistakenly put the deadline to file the amended complaint on his calendar for May 2018 instead of March 2018. On May 14, 2018, the court denied Armstrong's motion for judgment of *non pros*, and granted Chada leave to file a second amended complaint. See Pa. R.P.C. 1.1.
- 
68. 2017-11-28 16-10717 Pursuant to the court's September 20, 2017, order, Chada filed a complaint on October 9, 2017. Brenntag and Armstrong filed preliminary objections on October 30, 2017. Chada filed an amended complaint on November 1, 2017. On November 21, 2017, Brenntag moved for a protective order. On November 28, 2017, the court granted Brenntag's motion for a protective order; struck the November 1, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "While this complaint was filed pursuant to Pa. R.C.P. 1028(c)(1), it failed to respond in any meaningful way to defendants' preliminary objections. In fact, it appears identical to the 10/9/17 complaint. Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the

- Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
69. 2018-01-25 16-10717 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
70. 2018-03-22 16-10717 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$2,019.50 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
71. 2018-06-11 16-10717 On February 13, 2018, the court entered an order on preliminary objections, requiring Brenntag to file an answer by March 16, 2018. On February 20, 2018, Brenntag filed an answer with new matter. The same day, Chada filed a motion for leave to file a response to Brenntag's new matter. On April 2, 2018, the court entered an order granting Chada leave to file a response within twenty days. As of June 11, 2018, which was beyond the time limit, Chada had not filed a response. See Pa. R.P.C. 1.1.
- 
72. 2017-11-09 16-10961 Pursuant to the court's September 20, 2017, order on preliminary objections, Chada filed a complaint on October 10, 2017. But on October 18, 2017, he filed a praecipe to substitute it with an amended complaint. On October 19, 2017, Brenntag moved for a protective order. After the defendants filed preliminary objections on October 30, 2017, he filed a third amended complaint on November 3, 2017. On November 9, 2017, the court granted Brenntag's motion for a protective order; struck the October 18, 2017, and November 3, 2017, complaints; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "Not only is plaintiffs' repeated

- filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
73. 2018-01-25 16-10961 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. The court's order noted the November 3, 2017, third amended complaint "contain[ed] only three new allegations in a complaint with nearly three hundred numbered paragraphs." See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
74. 2018-03-22 16-10961 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$1,748.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
75. 2018-06-05 16-10961 On December 7, 2017, the court entered an order on preliminary objections. Armstrong filed an answer with new matter on January 19, 2018. On February 17, 2018, Chada filed a response to Armstrong's new matter that contained impertinent allegations that the court's previous orders had limited or prohibited. On March 9, 2018, Armstrong filed a motion to strike and for sanctions. On June 5, 2018, the court entered an order striking the response and granting sanctions. The court noted Chada "failed to include a verification in conformity with Pa. R.C.P. 1024(a)," failed to comply with the court's previous opinions and orders, misrepresented the findings of a worker's compensation judge, and violated Pa. R.C.P. 1023.1. See Pa. R.C.P. 1023.1(c)(1), (2); Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
76. 2017-11-28 16-10962 Pursuant to the court's September 21, 2017, order on preliminary objections, Chada filed a complaint on October 9, 2017. Paragraph

- 118 of the complaint included an allegation that the plaintiff had “developed fatal metastatic cancer and died from the complications of metastatic cancer,” but in Paragraph 6 of his November 19, 2017, response to Brenntag’s preliminary objections, Chada stated plaintiff was actually alive and “[t]he reference to death in paragraph 118 is an editing error.” After the defendants filed preliminary objections on October 30, 2017, he filed an amended complaint on November 6, 2017. On November 27, 2017, Brenntag moved for a protective order. On November 28, 2017, the court granted Brenntag’s motion for a protective order; struck the November 6, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court’s order stated: “Not only is plaintiffs’ repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff’s claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling.” See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
77. 2018-01-25 16-10962 Chada filed a response to the court’s rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag’s request for monetary sanctions. The court’s order noted the November 6, 2017, complaint “appear[ed] identical to the 10/9/17 complaint.” See Pa. R.C.P. 1023.1; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
78. 2018-03-22 16-10962 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$825.00 in fees and costs against Chada individually. The court stated: “Attorney Chada’s response attempts to relitigate the court’s decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI.” The court also stated: “Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ....” See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
- 
79. 2017-11-28 16-10963 Pursuant to the court’s September 20, 2017, order, Chada filed a complaint on October 8, 2017. Brenntag and Armstrong filed



preliminary objections on October 30, 2017. Chada filed an amended complaint on November 2, 2017. On November 22, 2017, Brenntag moved for a protective order. On November 28, 2017, the court granted Brenntag's motion for a protective order; struck the November 2, 2017, complaint; prohibited Chada from filing future pleadings without leave of court; and entered a rule upon him to show cause why monetary sanctions should not be imposed. The court's order stated: "While this complaint was filed pursuant to Pa. R.C.P. 1028(c)(1), it failed to respond in any meaningful way to defendants' preliminary objections. In fact, it appears identical to the October 10, 2017 complaint. Not only is plaintiffs' repeated filing of complaints confusing and unduly burdensome to the defendants, it appears as though plaintiffs mock the Pennsylvania Rules of Civil Procedure themselves. The purpose of Rule 1028(c)(1) is to conserve judicial resources by allowing the parties themselves to agree on a statement of a plaintiff's claims. Rule 1028(c)(1) does not afford a plaintiff the opportunity to needlessly prolong the pleading process in an apparent attempt to avoid a judicial ruling." See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

80. 2018-01-25 16-10963 Chada filed a response to the court's rule on December 26, 2017. The court held a hearing on December 28, 2017. Chada failed to meaningfully respond to the rule, both in writing and at the hearing. On January 12, 2018, the court entered an opinion and order granting sanctions in the related case of Cooper v. Brenntag, CI-15-08200. On January 25, 2018, the court entered an order granting Brenntag's request for monetary sanctions. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
81. 2018-03-22 16-10963 Brenntag filed a fee petition on February 21, 2018. Chada filed a response on March 7, 2018. On March 22, 2018, the court entered an order awarding \$648.00 in fees and costs against Chada individually. The court stated: "Attorney Chada's response attempts to relitigate the court's decision of January 12, 2018, to grant sanctions and his filings are wholly unresponsive to the fee petition filed by BNI." The court also stated: "Attorney Chada has failed to remotely address any of the elements the court must examine in determining the amount of fees and costs ...." See Pa. R.C.P. 1023.2; 1023.4; Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.
82. 2018-05-14 16-10963 On February 23, 2018, the court entered an order on preliminary objections, requiring Chada to file an amended complaint by March 23, 2018. Chada failed to file an amended complaint. On May 4, 2018, Armstrong filed a motion for judgment of *non pros* under Pa. R.C.P. 1037(c). On May 11, 2018, Chada filed a motion for leave to file a second amended complaint, claiming that he had mistakenly put the deadline to file the amended complaint on his calendar for May 2018 instead of March 2018. On May 14, 2018,

the court denied Armstrong's motion for judgment of *non pros*, and granted Chada leave to file a second amended complaint. See Pa. R.P.C. 1.1.

---

83. 2018-01-03 17-06946 On September 21, 2017, the court entered an order requiring Chada to file an amended complaint by October 11, 2017. Chada failed to file an amended complaint. On October 31, Dr. Hay filed a motion for summary judgment. On November 3, 2017, Chada filed a motion for leave to file a second amended complaint. On November 6, 2017, before the court ruled on Chada's November 3 motion, he filed a praecipe to attach an amended complaint to his November 3 motion. On January 3, 2018, Dr. Hay filed a motion for sanctions against Chada individually, alleging he violated Pa. R.C.P. 1023.1 by making claims that were barred by claim preclusion, were not recognized as private causes of action by Pennsylvania law, were not supported by evidence, and were violations of prior court orders. See Pa. R.P.C. 1.1; 3.1; 3.2; 3.3; 8.4.

---

84. 2018-06-04 17-09152 On December 15, 2017, Brenntag filed a motion for reconsideration on the Landis v. Brenntag, CI-15-08672, docket of the January 15, 2015, order granting Chada's motion to consolidate it with this case. Brenntag asserted that Chada failed to identify the correct judge on the cover sheet of the motion to consolidate, because the assigned judge had denied a similar motion two weeks before, and he sought to consolidate the cases to obtain an extension of the discovery deadline, which was less than one month away, in an end run around the case management order and rules of civil procedure. On January 5, 2018, Armstrong filed a joinder in Brenntag's motion on this docket, noting: "Armstrong has no record of being served with a copy of the motion to consolidate, which was filed under the *Landis v. Brenntag* matter. Armstrong first became aware of the motion to consolidate after the order was issued granting the motion." In his February 21, 2018, response, Chada argued the coordinate jurisdiction rule prohibited this court from vacating the consolidation, but the coordinate jurisdiction rule does not apply to motions for reconsideration. On June 4, 2018, the court entered an order granting reconsideration and vacating the consolidation order. See Pa. R.P.C. 3.1; 3.2; 3.3; 8.4.

---

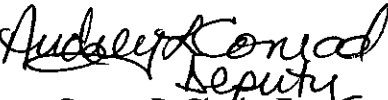
The rule is returnable in writing, and Attorney Chada shall file an answer, if any, by July 6, 2018. Attorney Chada shall NOT file a motion for leave to file his answer before filing his answer. Defendants may file a response by July 20, 2018. All actions and proceedings in all the above captioned cases are hereby STAYED until further order of court.

BY THE COURT:



---

LEONARD G. BROWN, III, JUDGE

ATTEST:   
Deputy

Copies: George P. Chada, Esq. *E*  
Todd M. Mosser, Esq. *E*  
Ronald E. Hurst, Esq. *E*  
George C. Werner, Esq.  
Kevin W. Fay, Esq.  
James P. DeAngelo, Esq.  
Michael J. Ossip, Esq.  
Joshua L. Kirsch, Esq.

NOTICE OF ENTRY OF ORDER OR DECREE  
PURSUANT TO PA. R.C.P. NO: 236  
NOTIFICATION - THE ATTACHED DOCUMENT  
HAS BEEN FILED IN THIS CASE  
PROTHONOTARY OF LANCASTER CO., PA  
DATE: 6-15-18