

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

THE ESTATE OF CODI JOYCE,
DECEASED, JOHN J. JOYCE,
ADMINISTRATOR,

Plaintiffs

v.

DEVIN HINKLE, RYAN SABO, CONNOR
STEVENS, DEREK R. MARCONE,
JESSICA LENTZ, and DANIEL J. LENTZ,
Jointly and Severally,

Defendants

CIVIL DIVISION

Case No. GD-17-7065

**NOTICE OF INTENT TO SERVE
SUBPOENATO PRODUCE
DOCUMENTS AND THINGS
FOR DISCOVERY
PURSUANT TO PA.R.C.P. 4009.21
DIRECTED TO
STEEL VALLEY SENIOR HIGH SCHOOL**

Filed on behalf of the Defendant,
Jessica Lentz

Counsel of Record for This Party:

ROBERT J. GRIMM, ESQ.
PA ID #55381

RYAN M. JOYCE, ESQ.
PA ID #309053

Swartz Campbell LLC
Koppers Building
436 7th Avenue
Floors 7 & 8
Pittsburgh, PA 15219

(412) 560-3267

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

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CASE No. GD-17-7065

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Jointly and Severally,

Defendants.

NOTICE OF INTENT TO SERVE SUBPOENA
TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY
PURSUANT TO PA.R.C.P. 4009.21,
DIRECTED TO STEEL VALLEY SENIOR HIGH SCHOOL

The Defendant, Jessica Lentz, by and through her attorneys, Robert J. Grimm, Esquire, Ryan M. Joyce, Esquire, and the law firm of Swartz Campbell, LLC, intend to serve the Steel Valley Senior High School with a Subpoena to Produce Documents or Things for Discovery, identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

DATE: January 7, 2019

Respectfully Submitted,

SWARTZ CAMPBELL, LLC



Robert J. Grimm, Esquire

Ryan M. Joyce, Esquire

Attorneys for the Defendant,

Jessica Lentz

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

THE COMMONWEALTH OF PENNSYLVANIA)ss:
COUNTY OF ALLEGHENY)

The Estate of Codi Joyce, deceased,
John J. Joyce, Administrator

vs.

No. GD-17-7065

Jessica Lentz, et al.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

To: Steel Valley High School

Name of Person or Entity

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum

at Swartz Campbell, LLC, Koppers Building, Floors 7 & 8, 436 7th Avenue, Pittsburgh, PA 15219
Address

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

Attorney's Name: Robert J. Grimm, Esquire

Address: Koppers Building, Floors 7 & 8, 436 7th Avenue
Pittsburgh, PA 15219

Telephone: 412-232-9800

Supreme Court ID # 55381

Attorney for: Jessica Lentz

Date:

N^o 19212



By The Court:

By: Kate Barkman

Kate Barkman

Director, Department of Court Records

By: Eric Feder

Eric Feder

Deputy Director, Department of Court Records

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Jointly and Severally,

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CIVIL DIVISION

Case No. GD-17-7065

**ADDENDUM TO
SUBPOENATO PRODUCE
DOCUMENTS AND THINGS
FOR DISCOVERY
PURSUANT TO PA.R.C.P. 4009.21
DIRECTED TO
STEEL VALLEY SENIOR HIGH SCHOOL**

Filed on behalf of the Defendant,
Jessica Lentz

Counsel of Record for This Party:

ROBERT J. GRIMM, ESQ.
PA ID #55381

RYAN M. JOYCE, ESQ.
PA ID #309053

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Koppers Building
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STEVENS, DEREK R. MARCONE,
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Jointly and Severally,

Defendants.

ADDENDUM TO SUBPOENA
TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY
PURSUANT TO P.A.R.C.P. 4009.21,
DIRECTED TO STEEL VALLEY SENIOR HIGH SCHOOL

TO: Steel Valley Senior High School, Custodian of Records
3113 Main Street
Munhall, PA 15120

Within twenty (20) days after service of this Subpoena, you are ordered by the Court to produce the following documents or things:

The complete academic and school records of Codi Joyce (DOB: 11/14/1991), a former student and 2010 graduate of the Steel Valley Senior High School.

In responding to the within Subpoena, please produce all records relating to Codi Joyce's enrollment, course of study, and graduation from the Steel Valley Senior High School. Records should include, but not be limited to, report cards or grading reports for all years of attendance; transcripts; standardized test results; any applicable individualized education program; curriculum-based records; disciplinary action records,

including detentions, suspensions, and expulsions; extra-curricular activities' records; teachers' and/or administrators' records; school nurse's records; notes; reports; and, all correspondence directed to, relating to, or involving Codi Joyce.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the within **Notice of Intent to Serve Subpoena to Produce Documents or Things for Discovery directed to Steel Valley Senior High School** was forwarded to the following counsel of record, by regular U.S. Mail, on the 7th day of January, 2019:

Lawrence E. Bolind, Jr., Esquire
238 Main Street
Imperial, PA 15126
(Counsel for Plaintiff, The Estate of Codi Joyce, Deceased, John J. Joyce, Administrator)

Kelley A. Morrone, Esquire
Law Offices of Kelley Morrone
2559A Brandt School Road, Suite 200
Wexford, PA 15090
(Counsel for Defendant, Daniel J. Lentz)

Robert A. Loch, Esquire
Robb Leonard Mulvihill
BNY Mellon Center
500 Grant Street, Suite 2300
Pittsburgh, PA 15219
(Counsel for Defendant, Derek Marccone)

Ryan H. James, Esquire
James Law, LLC
1514 Lincoln Way, Suite 301-302
White Oak, PA 15131
(Counsel for Defendant, Connor Stevens)

Devin Hinkle
130 Lawrence Avenue
Munhall, PA 15120
(Defendant)

Ryan Sabo
4409 Woodhill Drive
Munhall, PA 15120
(Defendant)

A handwritten signature in black ink, appearing to be 'RJG', is positioned above a horizontal line.

Robert J. Grimm, Esquire
Ryan M. Joyce, Esquire
Attorneys for the Defendant,
Jessica Lentz