

Dear Eagle Lake Members,

Today at approximately 4:00pm the Eagle Lake Community Association was served with a court order issued by Judge Thomas Munley, Lackawanna County Court of Common Pleas to close the Eagle Lake Community to all owners and only permit essential workers into the community. The closure is to be immediate. A copy of the court order can be found on the website at www.eaglelakeca.com under emergency updates for your review.

Therefore, it is recommended that if you have not left your primary home to come to Eagle Lake upon receipt of this message, that you stay at home and do not leave.

The Eagle Lake legal counsel is in contact with the Covington Township legal counsel and discussions will be held immediately to attempt to resolve this matter. If necessary, a hearing on the injunction will be held at the end of next week.

Final Note: Those individuals presently at the community or en route at the time of this message will be permitted entrance into the community and to stay for the registered time period.

Thank you.

WOLFF

— L A W —

Joel M. Wolff

www.wolfflawpc.com

jwolff@wolfflawpc.com

May 1, 2020

VIA HAND DELIVERY

Eagle Lake Realty Company
638 Drinker Turnpike
Covington Twp., PA 18424

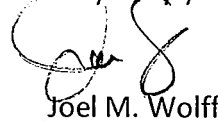
Eagle Lake Community Association
Route 435
Covington Twp., PA 18424

**RE: Covington Township v. Eagle Lake Realty Company and Eagle Lake
Community Association, Docket No. 2020-CV-2033**

Dear Sir/Madam:

My firm represents Covington Township in the above-referenced matter. Enclosed please find the Complaint and Petition for Preliminary and Emergency Injunctive Relief ("Petition") which was filed with the Court on today's date. Also enclosed is the Honorable Thomas Munley's Order granting Covington Township's Petition. Please immediately provide it to your counsel and have he or she contact me at the first opportunity.

Very truly yours,



Joel M. Wolff

JMW/blb

Enclosure

cc: Covington Township Supervisors (w/enc)(via email ktierney@covingtontwp.org)

IN THE COMMONWEALTH OF PENNSYLVANIA

COVINGTON TOWNSHIP

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

Plaintiff,

v.

CIVIL ACTION - LAW

EAGLE LAKE REALTY COMPANY and
EAGLE LAKE COMMUNITY ASSOCIATION

Defendants.

No. 2020-CV- 207

MAURI B. KELLY
LACKAWANNA COUNTY
2020 MAY - 1 P 2:45
CLERKS OF JUDICIAL
RECORDS CIVIL DIVISION

ORDER

AND NOW, this 15th day of MAY, 2020, upon consideration of Plaintiff's Petition for Preliminary and Emergency Injunction, it appearing to the Court that Plaintiff's right to relief is clear and the harm immediate and irreparable, it is hereby ORDERED that Defendant Eagle Lake Community Association immediately cease non-essential operations and limit access to its facilities to **ESSENTIAL PERSONNEL ONLY** until no earlier than May 8, 2020 at which time a hearing will be conducted to determine what if any further injunctive relief is warranted.

BY THE COURT,

Thomas Munley

IN THE COMMONWEALTH OF PENNSYLVANIA

COVINGTON TOWNSHIP

Plaintiff,

v.

EAGLE LAKE REALTY COMPANY and
EAGLE LAKE COMMUNITY ASSOCIATION

Defendants.

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

CIVIL ACTION - LAW

No. 2020-CV-

2033

MAURIE B. KELLY
LACKAWANNA COUNTY
2020 MAY -1 P 12:11
CLERKS OF JUDICIAL
RECORDS CIVIL DIVISION

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE CERTAIN ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND WHERE YOU CAN GET LEGAL HELP.

Pa. Lawyer Referral Service
P.O. Box 1086
Harrisburg, PA 17108
Pa. Residents Telephone:
1-800-692-7375

Northeastern Pennsylvania
Legal Services, Inc.
33 North Main Street, Ste 200
Pittston, PA 18640
Telephone: (855) 236-6405

Out of State Residents Telephone:
1-717-238-6715

AVISO

A USTED SE LE HA DEMANDADO EN LA CORTE. Si usted quiere defenderse contra la demanda expuesta en las siguientes páginas, tiene que tomar acción en un plazo de veinte (20) días después que reciba esta demanda y aviso, por presentar una notificación de comparecencia escrita personalmente o por un abogado y radicar por escrito en la Corte sus defensas u objeciones a las demandas presentadas en su contra. Se le advierte que si falla en hacerlo, el caso podría seguir adelante sin usted y un fallo podría ser dictado en su contra por la Corte sin previo aviso por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio pedido por el/la demandante. Puede que usted pierda dinero o propiedad u otros derechos importantes para usted. USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO, DIRÍJASE O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ABAJO. ESTA OFICINA PUEDE PROVEERLE CON INFORMACIÓN SOBRE COMO CONTRATAR UN ABOGADO. SI NO TIENE LOS FONDOS SUFICIENTES PARA CONTRATAR UN ABOGADO, ESTA OFICINA PODRÍA PROPORCIONARLE INFORMACIÓN ACERCA DE AGENCIAS QUE PUEDAN OFRECERLES SERVICIOS LEGALES A PERSONAS QUE REÚNAN LOS REQUISITOS A UN HONORARIO REDUCIDO O GRATIS.

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IN THE COMMONWEALTH OF PENNSYLVANIA

| | | |
|----------------------------------|---|------------------------------|
| COVINGTON TOWNSHIP | : | IN THE COURT OF COMMON PLEAS |
| | : | OF LACKAWANNA COUNTY |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| EAGLE LAKE REALTY COMPANY and | : | |
| EAGLE LAKE COMMUNITY ASSOCIATION | : | |
| | : | |
| Defendants. | : | No. 2020-CV- <u>2033</u> |

MAURIE B. KELLY
 CLERK OF JUDICIAL
 RECORDS CIVIL DIVISION
 2020 MAY -1 P 12:1
 LACKAWANNA COUNTY

COMPLAINT

Plaintiff Covington Township (the "Covington Township" or "Plaintiff"), by and through its undersigned counsel, hereby submits this complaint against Defendants Eagle Lake Realty Co. and Eagle Lake Community Association (collectively "Eagle Lake" or "Defendants"), which seeks emergency and preliminary injunctive relief to keep Eagle Lake from opening its recreational vehicle community on May 1, 2020 until May 15, 2020 so that a Court ordered plan is in place to mitigate the spread of COVID-19 from its transient members and their short-term renters into Covington Township and the surrounding communities. In support thereof, Plaintiff aver the follows:

THE PARTIES

1. Covington Township is a political subdivision organized under the laws of this Commonwealth located at 20 Moffat Drive, Covington Township, County of Lackawanna, Pennsylvania 18444.
2. Eagle Lake Realty Company is a Pennsylvania Corporation that is located at 638 Drinker Turnpike, Covington Township, County of Lackawanna, Pennsylvania 18424.

3. Eagle Lake Community Association is a Pennsylvania organization organized under the lease located at Route 435, Covington Township, County of Lackawanna, Pennsylvania 18424

JURISDICTION AND VENUE

4. This Court possesses jurisdiction over the claims set forth herein as well as the parties to this action pursuant to 42 Pa.C.S.A. §5301.

5. Venue for this action is proper in the Court of Common Pleas of Lackawanna County, Pennsylvania pursuant to Rule 1006 of the Pennsylvania Rules of Civil Procedure insofar as Defendants and/or their agents are located in Lackawanna County and the real estate which is the subject of this action is located in Lackawanna County.

FACTUAL BACKGROUND

6. Plaintiff incorporates by reference the preceding paragraphs as if the same were set forth herein at length.

7. A respiratory disease named Coronavirus Disease 2019 and known by its abbreviated name COVID-19 ("COVID-19") spreads from person to person contact and from contact with contaminated surfaces or objects.

8. The spread of COVID-19 spreads easily and sustainably in communities.

9. On January 21, 2020 the spread of COVID-19 in the United States caused the Centers for Disease Control and Prevention ("CDC") to activate its Emergency Operations Center on January 31, 2020.

10. On January 31, 2020 the spread of COVID-19 caused the U.S. Department of Health and Human Services ("HHS") Secretary to declare a public health emergency.

11. COVID-19 had spread so quickly throughout the world that on March 11, 2020, the World Health Organization ("WHO") declared COVID-19 a pandemic.

12. Commonwealth of Pennsylvania Governor Tom Wolf ("Governor Wolf") issued a Proclamation of Disaster Emergency on March 6, 2020 due to COVID-19 under the authority of 35 Pa C.S. § 7101, et seq. that authorized the suspension of certain procedures and formalities prescribed by law and urged counties in the Commonwealth to act as necessary to meet the current exigencies.

13. On March 13, 2020 President Donald J. Trump ("President Trump") declared a national emergency pursuant to 42 U.S.C. 5121-5207 (the Stafford Act) due to the public health emergency created by the spread of COVID-19.

14. On March 16, 2020 Lackawanna County declared an emergency due to COVID-19.

15. On April 15, 2020 Lackawanna County extended the declaration of emergency until May 15, 2020.

16. On April 20, 2020 Governor Wolf and Pennsylvania Secretary of Health Dr. Rachel Levine ("Dr. Levine") extended a Stay-at-Home Order issued on April 1, 2020 for the entire Commonwealth until May 8, 2020.

17. Eagle Lake requested but was denied a waiver to the Commonwealth's Stay-at-Home Order.

18. On March 19, 2020 Covington Township declared an emergency due to COVID-19, Pursuant to Section 7501 of the Pennsylvania Emergency Management Services Act (35 PA

CSA §7501). See the March 19, 2020 Declaration of Emergency, a true and correct copy of which is attached hereto as Exhibit "A".

19. Covington Township extended the declaration of emergency on April 22, 2020 with an expiration date of June 3, 2020. See the April 22, 2020 Declaration of Emergency, a true and correct copy of which is attached hereto as Exhibit "B".

20. Eagle Lake is a recreational vehicle community with its own water system, sewage treatment plant, pool area, fitness center, comfort stations, laundry facilities, library and community management office and is zoned as such.

21. Eagle Lake is a seasonal community and its members and short-term renters utilize recreational vehicles for their temporary lodging during their stay.

22. The recreational vehicles number in the thousands, can accommodate up to five (5) persons and are in very close proximity to each other, so close that social distancing guidelines will be difficult if not impossible to follow.

23. A significant percentage of Eagle Lake's membership resides in the Greater New York City ("NYC") area.

24. Currently NYC has 159,865 confirmed cases of COVID-19. See NYC Health COVID-19 Data request, a true and correct copy of which is attached hereto as Exhibit "C".

25. NYC currently has 12,287 confirmed deaths due to COVID-19, with another 5,302 probable deaths due to COVID-19. Id.

26. NYC has the highest infection rate of COVID-19 in the State of New York. See Daily Data Summary as of April 28, 2020 of NYC Health, a true and correct copy of which is attached hereto as Exhibit "D".

27. The State of New York has the highest infection rate of COVID-19 of any state in the United States, which has the highest infection rate in the world.

28. Pursuant to the Emergency Declaration Covington Township requested that Eagle Lake maintain a moratorium on access and use of its facilities. See the March 20, 2020 and April 22, 2020 letters to Eagle Lake, a true and correct copies of which are attached hereto as Exhibits "E" and "F" respectively.

29. Eagle Lake voluntarily honored the request of Covington Township.

30. While Governor Wolf announced Statewide Reopening of Limited Outdoor Activities on April 27, 2020 and on April 28, 2020 modified the Commonwealth's Industry Operation Guidance so that certain limited outdoor activities could be conducted such as the opening of privately held campgrounds.

31. Subsequently, Eagle Lake abruptly announced on April 30, 2020 that it would open its doors to its membership and in so doing allowing its transient, seasonal population to travel from an area with the highest infections rates for COVID-19 in the world, into Covington Township and its neighboring communities.

32. The travel of the transient population will significantly increase the exposure and infection rate of COVID-19 of the residents of Covington Township and Lackawanna County which recorded 82 deaths due to COVID-19 as of April 30, 2020. See COVID-19 Data for Pennsylvania for April 30, 2020 released by the Pennsylvania Department of Health, a true and correct copy of which are attached hereto as Exhibit "G".

COUNT I

INJUNCTIVE RELIEF

33. Plaintiff incorporates by reference the preceding paragraphs as if the same were set forth herein at length.

34. The elements necessary to establish entitlement to a preliminary injunction are: (1) immediate and irreparable harm in the absence of an injunction; (2) greater injury will result from refusing an injunction than from granting it; (3) an injunction will restore the parties to the status quo that existed immediately prior to the wrongful conduct; (4) the proponent's right to relief is clear; (5) the injunction is reasonably suited to abate the offending activity; and (6) the preliminary injunction will not adversely affect the public interest. Hyland v. West Shore School District, 52 A.3d 572, 582 (Pa.Cmwlt.2012); American Homecare Supply Mid- Atlantic, LLC v. Gannon, 10 Pa. D. & C. 5th 362, 3 (Lacka.Co.2009).

35. Here Eagle Lake has created an immediate and irreparable harm to the residents of Covington Township by abruptly allowing its members to travel from the NYC area and other COVID-19 hotspots into Covington Township.

36. There is a significant risk to the residents of Covington Township of a spike of COVID-19 infections caused by an unmitigated influx of transient, Eagle Lake members and their renters into Covington Township.

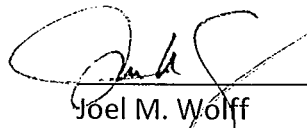
37. An injunction will return the parties to the status quo which existed prior to Governor Wolf's decision to allow privately owned campgrounds to open on May 1, 2020 and Eagle Lake's April 30, 2020 decision to open its doors to its membership.

38. Covington Township has a clear right to protect the health, safety and wellbeing of its residents, especially when the United States, the Commonwealth of Pennsylvania and Covington Township are in States of Emergency. 35 PA CSA §7501.

39. An emergency and preliminary injunction will protect, not adversely affect, the public interest as it will impede the spread of COVID-19 into Covington Township and the surrounding community.

WHEREFORE, Covington Township seeks emergency and preliminary injunctive relief restraining Eagle Lake from operating its facilities until a plan can be developed to open in a manner which protects Eagle Lake's employees, and the public from the unmitigated spread of the COVID-19 virus into Covington Township caused by the influx of transient owners and renters of Eagle Lake into Covington Township.

Respectfully Submitted,



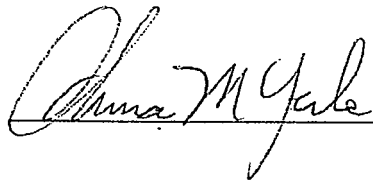
Joel M. Wolff
WOLFF LAW, P.C.
604 N. Blakely Street
Dunmore, PA 18512
Email: jwolff@wolfflawpc.com

Attorney for Covington Township

DATED: May 1, 2020

VERIFICATION

I, Thomas Myerke, hereby certify and affirm that I am authorized to execute this Verification on behalf of Plaintiff Covington Township and that the statements contained in the foregoing complaint are true and correct to the best of my knowledge, information and belief, and are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsifications to authorities.



Date: May 1, 2020

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that requires filing confidential information and documents differently than non-confidential information and documents.

A handwritten signature in black ink, appearing to read 'J. Wolff', is written over a solid horizontal line.

Joel M. Wolff
WOLFF LAW, P.C.
604 N. Blakely Street
Dunmore, PA 18512
(570) 866-2755

DATED: May 1, 2020

IN THE COMMONWEALTH OF PENNSYLVANIA

| | | |
|----------------------------------|---|------------------------------|
| COVINGTON TOWNSHIP | : | IN THE COURT OF COMMON PLEAS |
| | : | OF LACKAWANNA COUNTY |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| EAGLE LAKE REALTY COMPANY and | : | |
| EAGLE LAKE COMMUNITY ASSOCIATION | : | |
| | : | |
| Defendants. | : | No. 2020-CV- <u>2033</u> |

MAURID B. KELLY
 CLERK OF JUDICIAL
 RECORDS CIVIL DIVISION
 LACKAWANNA COUNTY
 2020 MAY -1 P 12:12

**PLAINTIFF COVINGTON TOWNSHIP'S PETITION FOR PRELIMINARY
AND EMERGENCY INJUNCTIVE RELIEF**

Plaintiff Covington Township (the "Covington Township" or "Plaintiff"), by and through their undersigned counsel, hereby respectfully submit this petition for an emergency and a preliminary injunction against Defendants Eagle Lake Realty Co. and Eagle Lake Community Association (collectively "Eagle Lake" or "Defendant"), pursuant to Rule 1531 of the Pennsylvania Rules of Civil Procedure and in support thereof, aver as follows:

1. On March 16, 2020 Lackawanna County declared an emergency due to COVID-19.
2. On April 15, 2020 Lackawanna County extended the declaration of emergency until May 15, 2020.
3. On April 20, 2020 Governor Wolf and Pennsylvania Secretary of Health Dr. Rachel Levine ("Dr. Levine") extended a Stay-at-Home Order issued on April 1, 2020 for the entire Commonwealth until May 8, 2020. See April 1, 2020 Stay-at-Home Order, a true and correct copy of which is attached hereto as Exhibit "A".

4. The States of New York, and New Jersey remain under Stay-at-Home Orders until May 15, 2020 and May 8, 2020. See Stay-at-Home Orders of Governors Andrew Cuomo and Phil Murphy, a true and correct copies of which is attached hereto as Exhibits "B" and "C".

5. Eagle Lake requested but was denied a waiver to the Commonwealth's Stay-at-Home Order.

6. On March 19, 2020 Covington Township declared an emergency due to COVID-19, Pursuant to Section 7501 of the Pennsylvania Emergency Management Services Act (35 PA CSA §7501). See the March 19, 2020 Declaration of Emergency, a true and correct copy of which is attached hereto as Exhibit "D".

7. Covington Township extended the declaration of emergency on April 22, 2020 with an expiration date of June 3, 2020. See the April 22, 2020 Declaration of Emergency, a true and correct copy of which is attached hereto as Exhibit "E".

8. Eagle Lake is a recreational vehicle community with its own water system, sewage treatment plant, pool area, fitness center, comfort stations, laundry facilities, library and community management office and is zoned as such.

9. Eagle Lake is a seasonal community and its transient members utilize recreational vehicles for their temporary lodging during their stay and rent their recreational vehicles on a short-term basis.

10. The recreational vehicles number in the thousands, can accommodate up to five (5) persons and are in very close proximity to each other, so close that social distancing guidelines will be difficult if not impossible to follow.

11. A significant percentage of Eagle Lake's membership resides in the Greater New York City ("NYC") area, as well as the States of New York and New Jersey.
12. Currently NYC has 159,865 confirmed cases of COVID-19 and NYC currently has 12,287 confirmed deaths due to COVID-19, with another 5,302 probable deaths due to COVID-19. See NYC Health COVID-19 Data request, a true and correct copy of which is attached hereto as Exhibit "F".
13. NYC has the highest infection rate of COVID-19 in the State of New York. See Daily Data Summary as of April 28, 2020 of NYC Health, a true and correct copy of which is attached hereto as Exhibit "G".
14. Likewise, the State of New Jersey has the second highest infection rate in the United States.
15. For these reasons New York, New Jersey and Pennsylvania and other Northeaster States have formed an agreement regarding the "COVID Corridor".
16. Pursuant to the Emergency Declaration Covington Township requested that Eagle Lake maintain a moratorium on access and use of its facilities. See the March 20, 2020 and April 22, 2020 letters to Eagle Lake, a true and correct copies of which are attached hereto as Exhibits "H" and "I" respectively.
17. Eagle Lake voluntarily honored the request of Covington Township.
18. Governor Wolf announced Statewide Reopening of Limited Outdoor Activities on April 27, 2020 and on April 28, 2020 modified the Commonwealth's Industry Operation Guidance so that certain limited outdoor activities could be conducted such as the opening of privately owned campgrounds.

19. Governor Wolf's Industry Operation Guidance specifically prohibits short-term rentals.

20. Subsequently, Eagle Lake abruptly announced on April 30, 2020 that it would open its doors to its membership and in so doing its transient, seasonal population will travel from NYC, New Jersey and other areas with the highest infections rates for COVID-19 in the world, into Covington Township and its neighboring communities.

21. The travel of the transient population will significantly increase the exposure and infection rate of COVID-19 of the residents of Covington Township and Lackawanna County which recorded 82 deaths due to COVID-19 as of April 30, 2020. See COVID-19 Data for Pennsylvania for April 30, 2020 released by the Pennsylvania Department of Health, a true and correct copy of which are attached hereto as Exhibit "J".

22. The elements necessary to establish entitlement to a preliminary injunction are: (1) immediate and irreparable harm in the absence of an injunction; (2) greater injury will result from refusing an injunction than from granting it; (3) an injunction will restore the parties to the status quo that existed immediately prior to the wrongful conduct; (4) the proponent's right to relief is clear; (5) the injunction is reasonably suited to abate the offending activity; and (6) the preliminary injunction will not adversely affect the public interest. Wyland v. West Shore School District, 52 A.3d 572, 582 (Pa.CmwltH.2012); American Homecare Supply Mid-Atlantic, LLC v. Gannon, 10 Pa. D. & C. 5th 362, 3 (Lacka.Co.2009).

23. Here Eagle Lake has created an immediate and irreparable harm to the residents of Covington Township by abruptly allowing its members to travel from the NYC area and other COVID-19 hotspots into Covington Township.

24. The harm of COVID-19, the spread of a highly contagious, sometimes lethal respiratory disease can not be repaired with monetary damages.

25. This risk of severe illness is high for those persons 65 or older and for those of all ages with serious underlying medical conditions such as asthma, diabetes, serious heart and lung conditions. See Center for Disease Control and Prevention for Coronavirus Disease 2019 (COVID-19), a true and correct copy of which is attached hereto as Exhibit "K".

26. There is a significant risk to the residents of Covington Township of a spike of COVID-19 infections caused by an unmitigated influx of transient Eagle Lake members into Covington Township.

27. An injunction will return the parties to the status quo which existed prior to Governor Wolf's decision to allow privately owned campgrounds to open on May 1, 2020 and Eagle Lake's April 30, 2020 decision to open its doors to its membership.

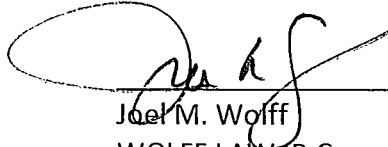
28. Covington Township has a clear right to protect the health, safety and wellbeing of its residents, especially when the United States, the Commonwealth of Pennsylvania and Covington Township are in States of Emergency. 35 Pa C.S.A. §7501; 53 P.S. §66506.

29. A temporary injunction will protect, not adversely, affect the public interest as it will impede the spread of COVID-19 into Covington Township and the surrounding communities.

WHEREFORE, Covington Township seeks and emergency and preliminary injunctive relief restraining Eagle Lake from operating its facilities until a Court ordered plan can be developed which protects Eagle Lake's employees, Covington Township residents and the

public from the unmitigated spread of the COVID-19 virus caused by the influx of transient owners and renters of Eagle Lake into Covington Township.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Joel M. Wolff', is written over a horizontal line.

Joel M. Wolff
WOLFF LAW, P.C.
604 N. Blakely Street
Dunmore, PA 18512
Email: jwolff@wolfflawpc.com

Attorney for Covington Township

DATED: May 1, 2020

VERIFICATION

1. Thomas M Yerke, hereby certify and affirm that I am authorized to execute this Verification on behalf of Plaintiff Covington Township and that the statements contained in the foregoing emergency and preliminary injunction are true and correct to the best of my knowledge, information and belief, and are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsifications to authorities.

A handwritten signature in cursive script, reading "Thomas M Yerke", is written over a horizontal line.

Date: May 1, 2020

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that requires filing confidential information and documents differently than non-confidential information and documents.

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Joel M. Wolff
WOLFF LAW, P.C.
604 N. Blakely Street
Dunmore, PA 18512
(570) 866-2755

DATED: May 1, 2020