

DIANE ZABOWSKI

ON AUGUST 6 2021, Mother was declared "incapacitated" because of a "evaluation" by a quack psychologist: ledakis. Ledakis was hired by the very corrupt judge weilheimer in charge of Mother's case. She hired him many times because he always said what the guardianship mafia told him to say pertaining anything he wrote that made me look bad so the mafia could restrict or deny me visits with Mother. Ledakis admitted in the petition hearing, by my questioning, that he had NO independent proof of accuracy for any of his used paper and pencil type tests and he had NO independent proof of the accuracy of his "evaluation". He claimed his "peers" like his "evaluations". When I asked him how many peers, weilheimer told him not to answer my question. Clearly, ledakis had no justification or accuracy to say a human being had a certain problem. Because of his made up "evaluation", my 96 year old Mother's life was going to become a living nightmare at the hands of the mafia until she died a extremely slow, painful, babarbaric and inhumane death by the mafia by morphine. Mother was killed by starvation and dehydration. Ledkis also admitted that he never audio or video recorded his sessions, using a simple cell phone, that he had with his victims (clients). His so-called "reports", because he never recorded the sessions in any way, he could not even prove it belonged to a specific person, instead of 100 Or 1,000 other people using a basic cut and paste of one name for another. Ledakis charged about \$5,000 per his "evaluations". Easy and fast money using the same report on many, many people?

That day, weilheimer assigned logie as the guardian of person and estate to Mother, even though my sister, jsh, and original petitioner of the fake guardianship just to get total ownership of Mother and her assets for jsh's personal greed. Jsh dropped out because she became known of my detailed information that she and the future guardian of estate, lawyer fenstermacher, had tried many times to get the same thing for years, but I always stopped those money grabs by jsh.

Logie then hired diane zabowski as his lawyer and she/he billed my Mother for all of zabowski's hours, which were massive. Logie had NO business billing my Mother because all of his expenses that he had as a business were to come from any profits of him doing business. Zabowski knew that, but nobody in the mafia paid for lawyer or any other costs themselves in Mother's guardianship scam, they always billed Mother because she was their cash machine. That is how it is done in guardianship corruption nationwide.

Zabowski was logies lawyer until he quit because of the constant pressure I kept putting on him exposing the fact that there were many health and other problems he never knew about and/or ever fixed. Zabowski, who has a well known reputation of not being a ethical and honest lawyer, was constantly insulting, degrading and lying about me only to try to push the attention of corruption and incompetence away from logie.

DIANE ZABOWSKI

1. Email I sent zabowski complaining of the very swollen legs of my Mother after she had been dumped at manatawny manor a month earlier. I sent the same letter to logie. Neither of them did anything about it, no matter how much I complained. I called the paramedics within 2 days because logie/zabowski ignored the seriousness of the problem, mainly it could be a blood clot. I also complained to both of them that the trash was not being picked up in Mother's room and it was always laying on the floor. About a month later, I found a dead mouse under Mother's bed. It took the director 2 days to take it away.
2. Zabowski letter claiming Mother needed a 1-1 aid for Mother. But, a Month earlier ledakis said Mother had NO problem with her daily activities: eating, hygiene, walking, dressing, etc. I knew that because I saw Mother everyday for dinner and she was still driving her car safely. No aid was ever assigned to Mother.
3. Zabowski telling that Mother's legs should have compression socks, low sodium diet and keep her legs elevated. But, Mother never had any diet restrictions or food allergies from her primary doctor of 21 years. Mother was not allowed to exercise as she always did, instead she was being kept as a animal in a cage in a tiny locked down section with people with mental and behavior problems. Mother was NEVER accused of having any mental or behavior problems. The staff basically NEVER put those compression socks on Mother. Mother basically just sat in her tiny room everyday with no place to go to walk.
4. Zabowski says Mother went to see a eye doctor. But, NONE of Mother's guardians ever took Mother to her own doctors, only the resident semi retired doctor of the nursing home. Mother's medical and dental care was never cared about by the mafia.
5. Several months AFTER I found and complained constantly about Mother's swollen and painful legs, the mafia/logie finally got her a appointment to have a ultrasound on her legs. Is THAT what a guardian is supposed to ignore: medical care for a 96 year old woman?
6. Zabowski's massive billing hours of doing nothing for Mother. Her charges were the sole responsibility of logie having a business. Consider the the high costs to Mother everytime someone's lawyer was talking to someone else's lawyer of the mafia, including jsh, jaskowiak, etc, and they would talk/email to the others. All paid for by Mother, but NOTHING was done FOR Mother's health and happiness being kept in a cage until she was killed by the mafia by morphine.
7. My email to zabowski complaining about Mother's swollen and painful legs.
8. Zabowski's reply to my petition to have logie fired as guardian of estate and person to Mother. Because he was both, there were checks and balances to what logie spent or approved others to spend. The mafia used every chance in petitions and court to always insult and degrade me because I was exposing their corruption. The same tactic is used nationwide by corrupt guardians. It is called demonizing them to humiliate them and to to use those lies to deny and restrict visits by loved ones. Zabowski uses many insults in her reply. Many, many lies by zabowski in this reply that have NOTHING to do with the health and welfare of Mother, but are only to keep lying about Arthur for the mafia's own benefit to stop Arthur from exposing their money grabbing of Mother's assets.
9. More and more wasteful billing hours by zabowski who is supposed to be paid by logie, NOT Mother.
10. another one of the people who had zabowski as a lawyer and was stabbed in the back by zabowski, big time.

1.

11/18/21

Sent to Zabowski - swollen legs of mother, no phone, trash not picked up.

Mail	Hex	Properties	Message Header	MIME	HTML	RTF	Attachments	
Path		C:\Program Files\Outlook\...					Date Time	11/18/2021 8:21:58 PM
From		"Teresa Knapp" <teresa20@comcast.com>						
To		Zabowski@state.gov						
Cc		"David Aschewski" <david.aschewski@state.gov>, "Britney Crane" <BCrane@FBI.gov>						
Bcc		teresa20@comcast.com						
Subject		June Haring's legs						
Attachment(s)								

As you know, I have released Mr. Knapp as my lawyer. I will be pro se.

For the past 2 days my mother's legs have been very swollen and hot. She told the front desk, but nobody has done anything. She must be taken to a hospital for a MRI to be sure it is not a blood clot that could kill her. No excuses. She must also be allowed to see her regular doctors, not somebody nearby.

After a full month in that pig pen, she still has no phone in her room. Why? There is trash on the floor because of the very tiny waste basket and no tables to put anything on. Trash brings bugs. Many things have to be put on the dirty floor. There is no excuse for that.

How can a person be denied the right to have a phone in their room and to use it in private? There is also the extremely important safety factor in case she needs to call for help or call me first.

Fw: Covid rules from facility

2.

From: Carl K <carl@cknapplaw.com>

To: herthur20@protonmail.com <herthur20@protonmail.com>

Date: Tuesday, October 19th, 2021 at 4:51 PM

See below email.

Carl M. Knapp, Esq.
KNAPP LAW, LLC
809 Bethlehem Pike
Building F, Unit F2
Ambler, PA 19002
215-268-6333
fax: 215-695-2055
Carl@cknapplaw.com
www.CKnappLaw.com

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From: Diane Zabowski <DZabowski@zabowskilaw.com>

Sent: Tuesday, October 19, 2021 1:17 PM

To: bcamp@htts.com <bcamp@htts.com>; David Jaskowiak <davidjas@davidjaslaw.com>; Carl K <carl@cknapplaw.com>

Subject: Covid rules from facility

Good afternoon,

I just learned that Manatawny Manor has the following rules:

1. If a visitor is vaccinated, the facility will want a copy of their vaccination card.
2. Visitors will complete a COVID questionnaire upon arrival and have their temperature taken.
3. Masks must be worn the entire time a visitor is in the building.

The facility is also requesting that Mr. Logie hire an aide to be with Jane. They believe

that she needs 1:1 assistance.

Thanks,
Diane

Diane M. Zabowski, Esquire
Zabowski Law LLC
Suite 205 E
100 Springhouse Drive
Collegeville, PA 19426
Phone: (610) 489-6016
Fax: (610) 489-6007
Email: dzabowski@zabowskilaw.com

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3.

From: Diane Zabowski <DZabowski@zabowskilaw.com>

Date: Wednesday, February 23, 2022 at 5:30 PM

To: Brittany Camp <BCamp@htts.com>, David Jaskowiak <davidjas@davidjaslaw.com>, Victor Meitner <vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com>

Subject: Jane Herring

Jane Herring attended her appointment today regarding her legs.

Good news --- she is fine.

She had been diagnosed a while ago with venus insufficiency. No change with diagnosis.

Recommendations:

1. Elevate her legs
2. Wear compression stockings
3. Have a low sodium diet

Diane

Diane M. Zabowski, Esquire

Zabowski Law LLC

Suite 205 E

100 Springhouse Drive

Collegeville, PA 19426

4,

From: Diane Zabowski <DZabowski@zabowskilaw.com>

Date: Friday, February 25, 2022 at 1:39 PM

To: Brittany Camp <BCamp@htts.com>, David Jaskowiak <davidjas@davidjaslaw.com>, Victor Meitner <vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com>

Subject: Jane Herring Eye Appointment

Good afternoon,

I am please to report that there are no concerns with Jane's vision.

She has a new prescription for glasses, which the doctor said is optional. She is happy with her current pair of glasses and did not express an interest in getting new glasses.

She should return in one year.

Diane

Diane M. Zabowski, Esquire

Zabowski Law LLC

Suite 205 E

100 Springhouse Drive

Collegeville, PA 19426

Phone: (610) 489-6016

Fax: (610) 489-6007

logieandcompany@verizon.net

Thu, Feb 10, 2022 • 16:56

5,

tomlinher1925@tutanota.com

Fri, Feb 11, 2022 • 08:09

tomlinher1925@tutanota.com

Fri, Feb 11, 2022 • 08:10

Victor Meitner

Fri, Feb 11, 2022 • 16:32

logieandcompany@verizon.net

Fri, Feb 11, 2022 • 17:25

Victor Meitner

Fri, Feb 11, 2022 • 17:29

Victor Meitner

Victor Meitner <vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com>
to: tomlinher1925@tutanota.com

Mon, Feb 14, 2022 • 09:23

Fwd: Ultrasound Appointment

FYI

Get [Outlook for iOS](#)

From: Diane Zabowski <DZabowski@zabowskilaw.com>

Sent: Monday, February 14, 2022 9:13:44 AM

To: Victor Meitner <vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com>

Cc: davidjas@davidjaslaw.com <davidjas@davidjaslaw.com>; Brittany Camp <BCamp@htts.com>

Subject: RE: Ultrasound Appointment

Good morning Vic,

The ultrasound will occur at the office of Main Line Vascular Institute.

The appointment on February 23 is the earliest available date --- this is not an exigent situation.

We are being guided by the medical people.

Thank for the offer of Mr. Herring driving his mother --- that will not be necessary.

Diane

Diane M. Zabowski, Esquire

Zabowski Law LLC

Suite 205 E

100 Springhouse Drive

Collegeville, PA 19426

Phone: (610) 489-6016

Fax: (610) 489-6007

Email: dzabowski@zabowskilaw.com

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ZABOWSKI LAW, LLC

Suite 205 E
100 Springhouse Drive
Collegeville, PA 19426

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February 16, 2022

Dwayne Logie
Logie & Co.
1042 Dunvegan Road
West Chester, PA 19382

Invoice #13241

Professional Services

	<u>Hrs/Rate</u>		<u>Amount</u>
8/13/2021 Phone call with Dwayne Logie	0.42 300.00/hr	DMZ	125.00
8/20/2021 Telephone call with David Jaskowiak	0.33 300.00/hr	DMZ	100.00
8/23/2021 2 Telephone calls from Dwayne Logie; phone call with David Jaskowiak	0.42 300.00/hr	DMZ	125.00
8/25/2021 Telephone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00
8/26/2021 Telephone calls with: David Jaskowiak and Brittany Camp; 2 phone calls with Dwayne Logie; emails to Dwayne Logie	1.33 300.00/hr	DMZ	400.00
8/27/2021 Conference Call with Judge Weiheimer and counsel	0.83 300.00/hr	DMZ	250.00
Telephone calls with Brittany Camp and David Jaskowiak	0.25 300.00/hr	DMZ	75.00
Email to/from Dwayne Logie	0.33 300.00/hr	DMZ	100.00
8/30/2021 Phone call with Dwayne Logie; email Dwayne; phone call with David Jaskowiak	0.25 300.00/hr	DMZ	75.00
8/31/2021 Telephone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00
9/3/2021 Email from Dwayne; phone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00

Dwayne Logie

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	<u>Hrs/Rate</u>		<u>Amount</u>
9/7/2021 Read and reply to emails; review checks that Dwayne obtained from Jane Herring's bank account	0.50 300.00/hr	DMZ	150.00
Telephone call with Dwayne Logie; phone call with David Jaskowiak; emails from Dwayne Logie	1.00 300.00/hr	DMZ	300.00
9/8/2021 3 phone calls with Dwayne Logie; 3 phone calls with David Jaskowiak; phone call with Deb Klock; Conference Call with Dwyane Logie and David Jaskowiak	1.50 300.00/hr	DMZ	450.00
9/9/2021 Telephone calls with Dwayne Logie, David Jaskowiak and Brittany Camp	0.50 300.00/hr	DMZ	150.00
9/10/2021 Telephone calls with David Jaskowiak, Dwayne Logie and Brittany Camp	0.58 300.00/hr	DMZ	175.00
9/13/2021 Telephone call from Brittany Camp	0.42 300.00/hr	DMZ	125.00
2 Telephone calls with Dwayne Logie; 2 phone calls with David Jaskowiak; emails from Dwayne Logie	0.75 300.00/hr	DMZ	225.00
9/14/2021 Telephone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00
9/15/2021 Attend in person Conference before Judge Weilheimer with counsel	1.50 300.00/hr	DMZ	450.00
2 phone calls with Dwayne Logie; phone call with Deb Klock; phone call with Brittany Camp	1.00 300.00/hr	DMZ	300.00
9/16/2021 Telephone call from David Jaskowiak; Conference Call with David Jaskowiak and Dwayne Logie	0.50 300.00/hr	DMZ	150.00
9/21/2021 Telephone call with Carl Knapp; phone call with David Jaskowiak; phone call with Dwayne Logie	0.50 300.00/hr	DMZ	150.00
9/22/2021 Telephone call with Dwayne Logie	0.23 300.00/hr	DMZ	70.00
9/23/2021 2 Telephone calls with Dwayne Logie	0.33 300.00/hr	DMZ	100.00
9/24/2021 Telephone call with David Jaskowiak	0.42 300.00/hr	DMZ	125.00
9/27/2021 Telephone call with Brittany Camp	0.08 300.00/hr	DMZ	25.00
9/28/2021 Zoom Call with Judge Weilheimer and counsel	0.83 300.00/hr	DMZ	250.00

Dwayne Logie

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	<u>Hrs/Rate</u>		<u>Amount</u>
9/28/2021 Phone call with Dwayne Logie	0.40 300.00/hr	DMZ	120.00
9/29/2021 Telephone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00
10/4/2021 Telephone call with Dwayne Logie; email to/from Dwayne Logie	0.42 300.00/hr	DMZ	125.00
10/5/2021 Telephone call with Dwayne Logie	0.15 300.00/hr	DMZ	45.00
10/6/2021 Telephone call with Ron Fenstermacher, email to and from Dwayne Logie	1.00 300.00/hr	DMZ	300.00
10/7/2021 3 Emails to Dwayne Logie	0.25 300.00/hr	DMZ	75.00
10/8/2021 Telephone call with Dwayne Logie	0.33 300.00/hr	DMZ	100.00
10/11/2021 Telephone call with Dwayne Logie; email from Dwayne	0.17 300.00/hr	DMZ	50.00
10/13/2021 2 Telephone calls with Dwayne Logie; emails from Dwayne	0.33 300.00/hr	DMZ	100.00
10/15/2021 Telephone call from Dwayne Logie; email counsel	0.08 300.00/hr	DMZ	25.00
10/22/2021 Telephone calls with : Dwayne Logie, Ron Fenstermacher and Carl Knapp	1.00 300.00/hr	DMZ	300.00
10/28/2021 Telephone call with Dwayne Logie	0.08 300.00/hr	DMZ	25.00
11/1/2021 Read Carl Knapp's email; phone call with Dwayne Logie; phone call with Ron Fenstermacher; email Carl Knapp; email Dwayne Logie	0.83 300.00/hr	DMZ	250.00
11/4/2021 Telephone call with Dwayne Logie; emails to Dwayne Logie	0.42 300.00/hr	DMZ	125.00
11/8/2021 Phone call from Dwayne Logie	0.33 300.00/hr	DMZ	100.00
11/9/2021 2 Telephone call with Dwayne Logie; phone call with David Jaskowiak	0.50 300.00/hr	DMZ	150.00
11/10/2021 Zoom Conference before Judge Weilheimer and counsel	1.50 300.00/hr	DMZ	450.00

Dwayne Logie

	<u>Hrs/Rate</u>		<u>Amount</u>
11/10/2021 Telephone calls with Dwayne Logie; Deb Klock; David Jaskowiak	0.95 300.00/hr	DMZ	285.00
11/11/2021 Telephone calls with: Dwayne Logie, Brittany Camp, David Jaskowiak and 2d call with Dwayne Logie	1.00 300.00/hr	DMZ	300.00
11/15/2021 Telephone call with Brittany Camp; phone call with David Jaskowiak; 2 phone calls with Dwayne Logie	0.67 300.00/hr	DMZ	200.00
11/16/2021 Telephone call with David Jaskowiak; phone call with Ron Fenstermacher; phone call with Dwayne Logie	0.83 300.00/hr	DMZ	250.00
11/17/2021 Telephone call with Dwayne Logie	0.17 300.00/hr	DMZ	50.00
11/19/2021 2 Phone calls with Dwayne Logie; phone call with David Jaskowiak; email to Dwayne Logie	0.75 300.00/hr	DMZ	225.00
11/22/2021 Telephone call from David Jaskowiak; phone call with Dwayne Logie; email Dwayne Logie	0.42 300.00/hr	DMZ	125.00
11/23/2021 Attend Emergency Zoom Conference before Judge Weilheimer -- Jaskowiak Emerg Petition for Contempt	0.50 300.00/hr	DMZ	150.00
Telephone call from Mr. Jaskowiak	0.25 300.00/hr	DMZ	75.00
Telephone call to Deb Klock; phone call with Dwayne Logie	0.33 300.00/hr	DMZ	100.00
11/29/2021 Telephone call with Dwayne Logie	0.25 300.00/hr	DMZ	75.00
12/8/2021 Telephone call with Dwayne Logie; phone call from Mr. Jaskowiak	0.50 300.00/hr	DMZ	150.00
12/14/2021 2 Telephone calls with Dwayne Logie	0.50 300.00/hr	DMZ	150.00
12/17/2021 Telephone call with Dwayne Logie; email to Dwayne	0.42 300.00/hr	DMZ	125.00
12/20/2021 2 Telephone calls with Dwayne Logie	0.25 300.00/hr	DMZ	75.00
12/22/2021 Telephone call from Dwayne Logie	0.33 300.00/hr	DMZ	100.00
1/3/2022 Telephone call with Dwayne Logie; email to and from Dwayne Logie	0.33 300.00/hr	DMZ	100.00

Dwayne Logie

	<u>Hrs/Rate</u>		<u>Amount</u>
1/4/2022 Phone call with Dwayne Logie	0.50 300.00/hr	DMZ	150.00
1/10/2022 Telephone call from Vic Meitner	1.00 300.00/hr	DMZ	300.00
Telephone calls with Ron Fenstermacher and David Jaskowiak; 2 phone calls with Dwayne Logie	1.00 300.00/hr	DMZ	300.00
Telephone call with Brittany Camp	0.58 300.00/hr	DMZ	175.00
1/11/2022 Letter to counsel and Arthur Herring with copy of Answer, letter to Vic Meitner	0.25 300.00/hr	DMZ	75.00
1/26/2022 Telephone call with David Jaskowiak	0.17 300.00/hr	DMZ	50.00
2/7/2022 Telephone call from Dwayne; email from Dwayne; phone call with David Jaskowiak	0.33 300.00/hr	DMZ	100.00
For professional services rendered	35.72		\$10,720.00
Additional Charges :			
1/13/2021 Clerk of the Orphans' Court - filing fee			21.50
1/11/2022 Clerk of the Orphans' Court - filing fee - Answer to Petition for Review Hearing			21.50
2/16/2022 Clerk of the Orphans' Court - filing fee - Petition for Approval of Counsel Fees			65.50
Total additional charges			\$108.50
Total amount of this bill			\$10,828.50
Balance due			\$10,828.50

H:\File\Email Backups\Sent\msn

Therhuar207 <therhuar207@profnetmail.com>

czabowski@szabrowski.com

therhuar207@profnetmail.com

2016-08-19 10:21

msn(a)

11/19/21

Date Sent :

bowski,

you know, I am now pro se. I sent emails to both jaskowiak and logic yesterday telling them my mother's legs are swollen, red and painful so to the hospital for a MRI to be sure there are no clots or other problems that could harm or kill her. I left a message about my mother's you know, I still not received repayment of \$260 for my mother's temporary glasses, she still has not gone to her actual eye doctor to doctor's appointments and I have not received the \$2,000 that my mother has given to us each year for birthday & Easter and later \$10,000 entering III

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IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION

NO. 2021-X2110

IN RE: JANE HERRING,
AN INCAPACITATED PERSON

ANSWER TO PETITION FOR
REVIEW AND REQUEST TO REMOVE GUARDIAN

Dwayne Logie, Permanent Plenary Guardian of Person and Estate, files the following

Answer and respectfully represents:

1. Admitted.
2. Admitted.
3. Denied. The averments contained within paragraph 3 and subparagraphs (a) through (k) are specifically denied. Strict proof is demanded at the time of hearing.
 - a. Denied. Strict proof is demanded at the time of hearing. On the contrary, Mr. Logie has acted appropriately by initially contacting Jane Herring's long time primary care physician, Dr. Kuhar, communicating with her and obtaining guidance. Further, Mr. Logie has consulted with Deborah Klock, a Registered Nurse and Certified Geriatric Care Manager, to obtain guidance and assistance. In addition, Mr. Logie arranged for Jane Herring to receive a Covid vaccine which Arthur Herring refused to do.
 - b. Admitted in part; denied in part. Strict proof is demanded at the time of hearing. It is admitted that Mr. Logie removed Jane Herring from her home. This occurred because Arthur Herring prevented Mr. Logie from doing his job

Case# 2021-X2110-22.2 Received at Montgomery County Register of Wills Office on 11/17/2022 10:40 AM, Fee = \$40.00. The filer certifies that this filing complies with the provisions of the Protective Order in Case No. 2021-00000 requiring filing confidential information and documents differently than non-confidential information and documents.

and Mr. Logie determined, as Judge Gail A. Weilheimer did, that Arthur Herring was an inappropriate caretaker who acted in his own best interest and not that of his Mother. It is admitted that Mr. Logie sold Jane Herring's car since she is no longer able to drive. It is denied that this conduct deprived Arthur Herring of a valuable asset; Arthur Herring did not own this car and had no right or entitlement to the vehicle. The car was a liability for Jane Herring's estate. The issue is what is best for Jane Herring, not Arthur Herring.

- c. Denied. After reasonable investigation Mr. Logie is without sufficient information to form an opinion as to the truth or falsity of the averments contained with subparagraph C and strict proof thereof, if relevant, is demanded at the time of trial. By way of further answer, it is specifically denied that Jane Herring's placement at Manatawny Manor was against the report and opinion of Dr. Ledakis. Dr. Ledakis was not aware of the extent to which Arthur Herring interfered in Jane Herring's life. Mr. Logie acted after consultation with the appropriate medical personnel who are well aware of the most recent medical developments in Jane Herring's life. Jane Herring also needed to be removed from Arthur Herring's care since he refused to schedule an appointment for her to be vaccinated against Covid and he refused to be vaccinated himself, all of which put his mother at risk for her health.
- d. After reasonable investigation Mr. Logie is without sufficient information to form an opinion as to the truth or falsity of the averments contained with subparagraph D and strict proof, thereof if relevant, is demanded at the time of

trial. Mr. Logie was appointed at the conclusion of the guardianship hearing and cannot comment upon Dr. Ledakis's testimony. Further, it is contended that Arthur Herring has taken Dr. Ledakis's testimony out of context. The certified geriatric care manager and other relevant medical personnel recommended Jane Herring's current placement.

- e. Denied. Strict proof is demanded at the time of hearing. It is contended that Arthur Herring's hatred for his sister results in his vituperative comments towards her. Jane Herring was initially transferred to her daughter's home when it became clear that Arthur Herring was not an acceptable caretaker and acted to obstruct the guardian's ability to do his job. Jane Herring was hospitalized after she refused to eat or drink on a very hot, humid day during the summer. The hospital admitted her because she needed to be admitted to the hospital. The duration of her hospital stay was engendered by the following issues: (1) her presenting medical condition, (2) the fact that she contracted Covid after being visited by her un-vaccinated son, and (3) the challenge of finding an appropriate bed in a suitable care facility.
- f. Denied. Strict proof is demanded at the time of hearing. Jane Herring is residing at Manatawny Manor which is an appropriate care facility for her. When not subjected to the screaming by her son and his desire to control her every action, Jane Herring is happy and content in her new environment.
- g. The averments contained with subparagraph G are specifically denied. Strict proof is demanded at the time of hearing. After consultation with staff and the geriatric care manager, Ms. Klock, the visitation scheduled was proposed to

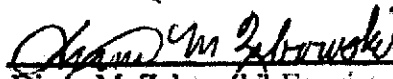
Judge Weilheimer who entered an appropriate order. Arthur Herring's
controlling and inappropriate behavior are solely responsible for the visitation
schedule which is in place.

- h. Denied. Strict proof is demanded at the time of hearing. Jane Herring has
access to a telephone during reasonable hours of the day. It is contended that a
private phone is not in the best interest of Jane Herring because Arthur
Herring will use it to dominate and manipulate his Mother by constantly
calling her and brainwashing her. Evidence of this behavior is that he will call
ten (10) times a day to speak to his Mother. Staff at the facility have noticed
agitation exhibited by Jane Herring after she has a telephone call with her son.
- i. Denied as stated. Strict proof is demanded at the time of hearing. It is
admitted that Mr. Logie has given Arthur Herring notice to vacate his
Mother's home and it is contended that Arthur Herring defiantly refuses to
vacate the property. Further, Arthur Herring has refused to contribute
financially to the maintenance of this home and is only concerned about the
sale of this asset since he will then need to locate alternate housing. Despite
our offers to gift Arthur Herring with sufficient funds to pay for his reasonable
rental costs, he continues to engage in a pattern of behavior designed to
threaten, intimidate, libel and harass any person who refuses to accede to his
self-serving demands.
- j. Denied. Strict proof is demanded at the time of hearing. It is contended that
none of the professionals in this case have been paid for their services. The
guardian and all counsel are well aware that they must petition this Honorable

Court for payment for their services. Arthur Herring continues to engage in a pattern of lying for his own self-serving needs.

- k. Denied. Strict proof is demanded at the time of hearing. Mr. Logie responds to legitimate inquiries and refuses to respond to harassment.
4. Denied. Strict proof is demanded at the time of trial. It is specifically denied that Dwayne Logie has acted inappropriately or that he should be removed for cause. Mr. Logie is ready, willing and able to resign as Plenary Guardian of the Person and Estate of Jane Herring once appropriate successor plenary guardians of Person and Estate are appointed.

Respectfully submitted,



Diane M. Zabowski, Esquire
Attorney ID No. 40497

100 Springhouse Drive, Suite 205E
Collegeville, PA 19426

Phone: (610) 489-6016

Fax: (610) 489-6007

Email: dzabowski@zabowskilaw.com

*Counsel for Dwayne Logie, Permanent
Plenary Guardian of the Person and
Estate of Jane Herring.*

ZABOWSKI LAW, LLC

Suite 205 E
100 Springhouse Drive
Collegeville, PA 19426

9

June 21, 2022

Dwayne Logie
Logie & Co.
1042 Dunvegan Road
West Chester, PA 19382

Invoice #13263

Professional Services

	<u>Hrs/Rate</u>		<u>Amount</u>
12/15/2021 Court Appearance - attend Contempt Hearing before Judge Weilheimer	4.00 300.00/hr	DMZ	1,200.00
2/11/2022 Telephone call with David Jaskowiak; 2 phone calls with Dwayne Logie; review emails from Dwayne Logie	0.50 300.00/hr	DMZ	150.00
2/17/2022 Phone call with Dwayne Logie; email to Dwayne Logie	0.42 300.00/hr	DMZ	125.00
2/23/2022 Phone call from Dwayne; email counsel	0.25 300.00/hr	DMZ	75.00
2/24/2022 2 Telephone calls with Dwayne Logie; phone call with David Jaskowiak; send emails to Dwayne Logie	1.00 300.00/hr	DMZ	300.00
Preparation of questions for Review Hearing	0.50 300.00/hr	DMZ	150.00
2/25/2022 Read and reply to emails from Dwayne Logie	0.42 300.00/hr	DMZ	125.00
3/2/2022 Email to Dwayne Logie	0.17 300.00/hr	DMZ	50.00
3/11/2022 Read and reply to Dwayne's emails	0.17 300.00/hr	DMZ	50.00
3/14/2022 Preparr Reply to Objections of Arthur Herring	1.00 300.00/hr	DMZ	300.00
3/16/2022 Zoom call with Judge Weilheimer and counsel	1.00 300.00/hr	DMZ	300.00

610-489-6016

Case# 2021-X2110-40 Received at Montgomery County Register of Wills Office on 06/21/2022 2:30 PM. Fee = \$64.00. The filer certifies 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 require filing confidential information and documents differently than non-confidential information and documents.

Dwayne Logie

	<u>Hrs/Rate</u>		<u>Amount</u>
3/16/2022 Phone call with Dwayne Logie	0.33 300.00/hr	DMZ	100.00
3/23/2022 Review email; forward to Mr. Jaskowiak	0.17 300.00/hr	DMZ	50.00
3/24/2022 Email to Dwayne Logie	0.17 300.00/hr	DMZ	50.00
4/8/2022 Email from Dwayne Logie	0.17 300.00/hr	DMZ	50.00
4/12/2022 Telephone call with Dwayne; email to counsel; emails to Dwayne Logie	0.50 300.00/hr	DMZ	150.00
4/14/2022 Telephone call with Dwayne; read and reply to emails	0.75 300.00/hr	DMZ	225.00
5/2/2022 Phone call from Dwayne	0.12 300.00/hr	DMZ	35.00
5/4/2022 Read and respond to Emergency Motion of Herring and Supplemental Petition for Review Hrg; 2 phone calls with Dwayne Logie	4.00 300.00/hr	DMZ	1,200.00
5/6/2022 Preparation of Joinder; Answer New Matter raised in Herring's Answer to Eviction; emails to Dwayne; prepare Affidavit of Service; email to counsel	2.00 300.00/hr	DMZ	600.00
5/6/2022 Letter to Judge Weilheimer; email to Deb Klock; email to Dwayne Logie	0.42 300.00/hr	DMZ	125.00
5/8/2022 Preparation of questions for witnesses	1.00 300.00/hr	DMZ	300.00
5/9/2022 Telephone call with Deb Klock	1.00 300.00/hr	DMZ	300.00
Telephone call with Dwayne Logie; emails to Dwayne Logie	1.00 300.00/hr	DMZ	300.00
5/11/2022 Attend Eviction and Review Hearing before Judge Weilheimer	4.00 300.00/hr	DMZ	1,200.00
For professional services rendered	25.06		\$7,510.00
Additional Charges :			
3/14/2022 Clerk of the Orphans' Court - filing fee - Reply to Objections of Arthur Herring			21.50
5/5/2022 Clerk of the Orphans' Court - filing fees - Answer to Emergency Motion of A. Herring; Answer to Supplemental Petition for Review			41.50

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Dwayne Logie

	<u>Amount</u>
5/5/2022 Clerk of the Orphans' Court - filing fee - Reply to New Matter in Eviction Petition	21.50
6/21/2022 Clerk of the Orphans' Court - filing fee - Petition for Allowance	64.50
Total additional charges	\$149.00
Total amount of this bill	\$7,659.00
Previous balance	\$10,828.50
Accounts receivable transactions	
3/31/2022 Payment - Thank You. Check No. 26303	(\$10,828.50)
Total payments and adjustments	(\$10,828.50)
Balance due	\$7,659.00

tomlinher1925@tutanota.com

Mon, Dec 13, 2021 • 07:56

10, ~~10~~

tomlinher1925@tutanota.com

Mon, Dec 13, 2021 • 07:56

Mary Whitten

Mon, Dec 13, 2021 • 16:10

Mary Whitten

Mary Whitten <maryvirus@yahoo.com>
to: tomlinher1925@tutanota.com + 1

Mon, Dec 13, 2021 • 16:11

Re: klock, inventory

→ Here is the letter trying to revoke Zabowski's license. The response came back that the disciplinary board talked to the judge in the case (Criminal Judge Ott), and since Ott didn't have a problem with her, neither did they.

On Monday, December 13, 2021, 04:09:43 PM EST, Mary Whitten <maryvirus@yahoo.com> wrote:

Hi Arthur,

→ I'm attaching the first document from below. I'm so sorry you are going through this. It makes me so mad. The files are big, so I'm sending them in separate emails.

Mary

On Monday, December 13, 2021, 03:31:28 PM EST, Coz Skaife <bakercoz@hotmail.com> wrote:

Hi Mary and Arthur,

Mary could you email a copy of affidavit of truth and the contest klock and zabowski license.

I only have a phone to do emails and its not letting me do searches.

Thank you so much,

Coz