

1. Many times I tried to get fenstermacher fired as being guardian of estate to Mother for 2 years. He was giving away money to people who did not deserve to be paid. He admitted in court in early 2023 he had not seen or talked to Mother for 4 years. How can he, as a lawyer, not talk to his client, but act for HER? This included he and jaskowiak (Mother's court appointed lawyer by corrupt judge weilheimer in mid may 2021) filing a petition to evict me from Mother's house WITHOUT asking her what she wanted. Jaskowiak only saw Mother twice in 3 years as her so-called lawyer. Jaskowiak was also making decisions and filing petitions on behalf of Mother without asking her also what she wanted. Mother had the right in guardianship to make decisions for herself. But, the guardianship mafia NEVER followed the federal and state laws of guardianship, PA Rules of Conduct for lawyers and rules for those claimed to be incapacitated. For 2 years before jsh filed her petition for guardianship in May 2021, I had been living at Mother's house at her request because she was alone and 94 years old. After the petition was filed, I lived there for about 2 more years and Mother wanted me to. Mother and I always had a very close and loving relationship. Mother made her demands known that she always wanted me to live in her house, both in writing and verbally, whether she was there or not. Fenstermacher admitted in court, by my questioning, he thought his only job was to sign anyone's checks and not worry about waste or fraud to Mother.
2. More problems with fenstermacher. He never became certified to be a guardian in the 2 years he was Mother's so-called guardian.
3. Fenstermacher signing off to have me evicted. He refused to provide me with my yearly gift money from Mother to find a place to live and survive at my age of 70.
4. Fenstermacher lied in his reply. He never offered any offer for me to leave Mother's house and NEVER asked Mother if she wanted me to be evicted. Fenstermacher/guardianship mafia wanted me out so they could sell the house to put more money into their pockets.
5. Fenstermacher's reply and his lies to my petition to force him to do what Mother wanted, which was to give me my gift money as she had done each year, for 8 years, after my father died in 2013. The money was given to both of Mother's children to use how we wanted. Fenstermacher does not answer any questions, just legalese non answers. Why did he NEVER solve any problems pertaining to Mother's health, welfare and happiness? Why did he force her to live in a low rated nursing home, locked in solitary confinement for her last 2 years of her life and while he was guardian of estate and giving her money to the guardianship mafia?

RONALD FENSTERMACHER, GUARDIAN OF ESTATE, TO JANE HERRING

1.

1. That this Orphans' Court has jurisdiction and venue over the matter of Jane Herring and the Petition Hearing pursuant to 20 Pa.C.S.A. Section 5512.2 and Orphans Court Rule 14.9.
2. Arthur Herring, III, age 69, presently retired, who resides at 26 Chancery Court, Souderton, Montgomery County, Pennsylvania 18964, and he is the son of Jane Herring ("Jane") as well as a resident of the real property at 26 Chancery Court for approximately two years, where he resided with his mother, Jane Herring.
3. Jane Herring was adjudicated by the Orphans Court of Montgomery County to be incapacitated on August 11, 2021.
4. Jane Herring is currently a 98 year old widow, with two adult children: her very much loved son to her, Arthur (age 69), and a daughter, jsh (age 72).
5. On August 25 2021, Jane (age 96) was kidnapped (taken away, by force, against her will, for monetary gain) by being deceived by jsh and first guardian, Logie. The kidnapping was part of the "Plan" by various people in a racket assigned to Jane as a guardianship scam to steal Jane's money and her house. Logie had called the scam the "Plan" many times in his emails to the other persons in the racket.
6. Despite the conclusion of the court's own hand picked expert, Ledakis, that said Jane could stay at home and since Arthur had been living there and everything was fine, someone ordered the kidnapping of Jane on August 25 2021 as part of the Plan.
7. Despite the Pennsylvania law that says the "incapacitated" Person is supposed to have their wants and wishes fulfilled by the guardian (person and/or estate), the Person is supposed to live in the least restricted way possible and the family is supposed to be totally involved in all decisions in the life, health, welfare and happiness of that Person, NONE of that was ever cared by and carried out by any of Jane's guardians, care manager and especially by Jaskowiak, court assigned lawyer for Jane.
8. To this day, despite many requests by Arthur to Jane's first assigned guardian, Logie, court assigned lawyer to Jane, Jaskowiak, jhs's lawyer, Camp, and to the court as to who approved the "Plan" to kidnap Mother and to begin stealing Jane's money, take Jane's much loved possessions and sell her expensive house for their own profit, NONE of those people have ever admitted approving the kidnapping of Jane.
9. After Jane was kidnapped, Jane was forced to stay, as a prisoner, at jsh's house. Jsh denied Jane to leave to go back home, jsh denied Jane to see Arthur, jsh denied Jane to call Arthur and jsh denied Jane food.
10. That night, jsh sent Arthur a email that if he came to see his Mother, jsh would have him arrested.
11. That same night (August 25, 2021) Arthur called the police for a wellness check because of his extreme concern for his Mother's life. The police claimed Jane was alright, but admitted they never talked to her or met her in person.
12. The next night (August 26) Arthur called police for another wellness check on his Mother, but the police refused to do so.

13. Within 24 hours of being kidnapped, Jane had to be put on anti-depressants by jsh and Logie because of Jane's torture, torment and being held a prisoner by jsh.
14. On Day 3 (August 27) Judge Weilheimer, in a phone call with Arthur, told Arthur that if ever called for another wellness check on Jane, she would charge him with Contempt of Court.
15. The same day, Jane's weekly hairdresser, of 16 years, told Arthur when Jane came in for her regular hairdressing appointment, she was shaking, crying and saying "I want to go home, I want to go home".
16. After about two weeks of being held as a prisoner with jsh, Jane denied to leave, denied to see or talk to Arthur, Jane had to be taken to the hospital, unconscious, by ambulance, confined to bed for six (6) weeks and treated for starvation.
17. While there, Jane had daily blood tests (42 times) and daily needles in the stomach to prevent blood clots (42 times). Guardian Logie refused Arthur to see Jane for a total of a month after Jane was kidnapped. He gave no reason for his decision.
18. After about a month, Arthur was finally allowed to see his Mother. His visits to Jane were set at one hour, three times a week for unknown reasons by Judge Weilheimer. Jane made it clear to Arthur she wanted to go home.
19. Arthur has asked several times to jaskowiak, weilheimer, logie and camp (jsh's lawyer), who ordered the kidnapping of Jane? There was no court order to do so by weilheimer. No body has ever responded!
19. Arthur saw Jane was not eating the hospital food because it was always cold and she hated the bland taste. With the doctor's permission, Arthur brought Jane all kinds of food she liked and she gobbled it up.
20. Arthur saw his Mother did not have her glasses, so he bought her a pair. To keep his Mother happy, every visit Arthur brought Jane roses, gifts, newspapers, cards, food. Arthur bought his Mother a watch because there was no clock in her room.
21. About week 5 in the hospital, Jane got covid where she could have died. Arthur was not allowed to see her for 10 days, but he still dropped off food, newspapers, roses and other gifts for his Mother to eat and to have to make her happy.
22. After Jane got over covid, about October 18, 2021, Logie dumped Jane into a very low rated and a extremely tiny room in a nursing home, Manatawny Manor (MM) that had just reopened after months of massive covid infections. Covid infections still exist at Jane's nursing home.
23. After Jane was dumped at the nursing home by Logie, Arthur got his Mother a refrigerator so his mother could have milk, fresh food and snacks, ice cream, juices, etc. Arthur saw she had torn and tattered bedspread, urine stained sheets, urine stained towels, missing sheets at times, a dead rodent and many other horrible and disgusting things that even a sleazy motel would not have.
24. Despite Arthur's many, many attempts to fix problems pertaining to Jane's happiness, health, welfare and life at the nursing home, all efforts have been denied (by one or more) by past and current guardians, their lawyers, deb klock (care manager hired by Logie and kept on by current guardian blumer) and Jane's court assigned lawyer, jaskowiak. No reasons given by any of them why they wouldn't correct those problems.

25. About November 15, 2021, Jane's legs became extremely swollen. Arthur called for the police and paramedics because there was a doctor on Saturday. Arthur thought his Mother had a blood clot that could have killed her. The paramedics simply told her to keep the compression socks on and keep her feet elevated.
26. The staff rarely put those socks on Jane and she was never taken to the hospital for an ultrasound on her legs. Arthur kept complaining to the director, staff and logie (later to guardian Pam Blumer). Because of Arthur showing the guardians did not know what they were doing, they started to blame Arthur's food he brought her for lunch 3x a week for Jane's swollen legs. Jane was never on any diet restrictions and never had any food allergies. None of the guardians ever cared what food MM was giving Jane 20x a week for all of the other meals.
27. About November 2022, Arthur stopped giving any food to his Mother. Not only did the swelling NOT go down, it became worse. Many times Arthur had to file police incident reports to put these problems on the record. Arthur proved his food was NOT causing his mother's legs to be swollen. To this day, Jane's legs are still very swollen.
28. Within a year of being at MM, the nursing home again had a COVID shutdown and Jane got COVID again where she could have died. Months after that, the nursing home again shut down for a major influenza shutdown. Jane got influenza where she could have died.
29. According to various studies, about 39% of all COVID deaths happen in nursing homes.
30. Jane has not been allowed any access to the outside world, no useful TV channels, no telephone to use, no access to any newspapers or magazines (unless Arthur brought them) for almost two (2) years in Jane's extremely restricted and tiny locked-in section of Manatawny Manor.
31. Jane has been basically kept in solitary confinement, in a sensory deprived environment, being denied the needed human contact to enjoy life, her health and happiness in her later years at her present location.
32. Since being involuntarily placed into the nursing home, Jane has been deprived of everyday activities that made Jane happy when she lived at her very large, beautiful, 3 bedroom, 3 bath home, in a private gated community of 21 years and with her much loved possessions of 58 years.
33. Arthur has tried, for almost two years, to get Jane back home to enjoy the life Jane had before JSH and Logie kidnapped her. During that time Arthur has found his Mother many much nicer, much bigger and much more cheaper places to live. But, none of Jane's guardians, their lawyers, care manager or Jaskowiak want her to leave the dump. They all have refused to discuss Jane leaving. No reasons given.
34. Pennsylvania law says how guardians must respect the wishes and wants of their clients and have the clients decide how their lives should be. Guardianships are to keep the lives of those people as close as it was before guardianship and to include the families at all times.
35. POW's get more privileges under the Geneva Convention than Jane does with the guardians, their lawyers, care manager and Jaskowiak.
36. People in prison for all types of crimes have more privileges than Jane.
37. Jane and Arthur have always had an extremely close and loving Mother/Son relationship during their lives. They made each other's lives better and much happier.
38. About April 2022, Jane was baffled as to why none of her guardians or lawyer got her back home. She wrote a

letter to weilheimer that she wanted to go home, Arthur was to live with her again, she wanted a new lawyer replacing jaskowiak, she wanted a phone in her room and she wanted to come to court to tell weilheimer that. Ledakis claimed she did not know what she was doing. But, about the same time, jaskowiak claimed he saw Jane, she said she like the room, liked the food and liked the people. So, was he was saying Jane knew what she liked? So, therefore Jane knew what she also wanted in her letter to weilheimer.

39. Jane has made it very clear to all who listen that she only totally trusts and strongly depends on Arthur for her health, welfare and happiness to make sure everyday matters are proceeding correctly, especially after her husband died in 2013 and since her forced placement at Manatawny Manor for the past two years.
40. Since Jane was kidnapped from her Souderton residence on August 25 2021, Jane has only been allowed to see her loved son for 1 hour, 3 times a week until about February 2023 when his visits were reduced from 3x a week to only 2x because of the lies in brandi's reports..
41. Jane and Arthur used to enjoy lunch together in the privacy of Jane's room at Manatawny Manor starting shortly after Jane was placed there. They would talk about matters of Jane's choice and she had concerns about.
42. Arthur would bring Jane roses, newspapers, magazines, gifts, snacks and ice cream for Jane and others to enjoy.
43. Arthur brought Jane two different cell phones to use, but each one was stolen by the staff. A permanent phone rather than a cell phone would enable Jane and her friends to speak whenever they wish and would also benefit Jane for her happiness, mental wellbeing and in case she needed medical attention again.
44. Jane has fallen three times because of the slippery waxed floors. Arthur bought her several pairs of no-slip socks to protect her body. The staff is almost never at their desk near Jane's room, so any call for help by Jane, day or night, would be useless and also because Jane does not have a private phone in her room or a medic alert necklace.
45. There are male patients in Jane's locked in section. The patients in her locked in section have mental and behavior problems. There are no locks on the patients doors. At night, Jane has to put a wastebasket behind the door so she will hear anyone that tries to come into her room.
42. Since Jane was placed at her location in October 2021, Arthur would always call his Mother twice every day to talk and to discuss problems that upset Jane living there. The Manatawny Manor desk phone was the method of contract after the cellphones were stolen. Jane had to stand at the staff desk and could only talk for a very short time.
43. During lunches in Jane's room, the staff would listen in on Jane's calls with Arthur, listen at the door and intercom when Jane and Arthur were having lunch in Jane's room.
44. About June 2022, Jane's current guardian of person, Blumer, stopped all phone calls by Arthur or Jane to each Other.
45. About May 2022, Jane and Arthur were told by Blumer they had to eat lunch in the TV room while being watched by the Manatawny Manor staff causing Jane to be upset because the staff kept watching and listening to their private conversations. Blumer claimed the never named 'staff' said Arthur was getting Jane "agitated" by his visits and phone calls.
46. About November 2022, Guardian Blumer forced Arthur to pay a friend of hers, brandi, to be a monitor at \$75

per visit to sit next to Jane and Arthur during their visit together.

47. Brandi was told to write lies in her reports so the reports could be used against Arthur to reduce his visits to none with his mother. Jaskowiak has tried to do that from the beginning because Arthur had exposed the "evaluation" by Iedakis as a fraud and was exposing the scam by various people using fake guardianships.
48. The scam is run by a racket. A racket is a group of people organized to commit a crime. What they are doing is called racketeering and is prosecuted by RICO.
49. Various persons of the racket claimed various "staff" people (never named or in any of their reports) said Arthur got Jane "agitated" by his visits and phone calls. Nobody ever asked Jane if that was true. Jane never refused any of Arthur's 2x a day phone calls or his 3x a week visits. Such accusations, without any names, is called here say.
50. Blumer told Arthur if he did not pay, he could not visit his Mother. Forcing Arthur to pay money was an extremely heavy burden on Arthur because he was on an extremely limited income of welfare. Arthur was broke from paying the lawyers money to get his Mother home. Arthur always bought Jane roses, gifts, cards newspapers to make her happy when he was not there. Arthur had to spend about \$100 a week on gas itself to see his Mother for one hour.
51. Because of brandi's lies in her reports, about February 2023, those visits were reduced to only 2 visits a week for 1 hour per visit and Arthur still had to pay a monitor to sit next to Jane and Arthur. Weilheimer refused to tell me/ex lawyer what brandi's qualifications were to listen, make accurate notes, make accurate quotes, while listening, on and on. I wanted to use a simple cell phone to record my visit. Cell phones do not lie with their information. All people and weilheimer refused to allow it and any way to protect Arthur from lies by them.
51. Based on a possible 16 hours a day of being with her son (8 hours for sleeping), from August 25, 2021 to March 1 2024, out of a possible 14,468 hours Jane could have been with Arthur, Jane has only been allowed to see Arthur for 224 hours for almost 2.5 years, at her age of 99, by the guardians (logie, fenstermacher and pam blumer), jaskowiak and the weilheimer.
52. All medical and psychological studies have proven loneliness, sadness and lack of exercise cause both severe medical and health problems and cause a dramatic loss of cognitive abilities. Jane has no access to reading material, unless when Arthur brings it. Jane's only exercise since October 2021, has been walking 35 feet from her room, to the TV room to eat, then back to her room. Jane usually sleeps in a chair or in bed. Because of the lack of exercise, since about March 2023, Jane has had to use a cane, something she never used before on a regular basis.
53. Arthur and Jane do not understand why he cannot see and visit with his Mother any time, for as long as they want and go where they want during the day since NO proof has ever been given why those type of visits cannot be.
54. After being extremely and extensively monitored, watched and listened to since May 2022, all reports, by both monitors sitting next to Jane and Arthur, have proven Arthur has NEVER been any type of threat to Jane and NEVER caused Jane to be "agitated" as Blumer has claimed various "staff" people, who were NEVER named by blumer and NONE of them ever said so in any of their reports and NEVER were brought into court by blumer, her lawyers or jaskowaik since Jane has been at Manatawny Manor.
55. At NO time has anyone ever asked Jane if she got "agitated" by Arthur in any way. Jane NEVER refused any of Arthur's phone calls and NEVER refused ANY of Arthur's visits. As a matter of fact, in a Zoom call to the court several months ago, one of those monitors, Brandi, stated all of Arthur and Jane's visits were loving and happy.

56. The basis of law in the U.S. is that a person is innocent until proven guilty in a court of law and a person has the right to face their accusers. Arthur has been convicted only by Blumer's empty accusations, just here say. Blumer was NEVER at any of those supposed situations and NEVER got anyone to testify from the "staff". Blumer's husband is a lawyer and he should have told her about hear say.
57. Jaskowiak, guardians and their lawyers, REFUSED Arthur the right to protect himself from various lies by the never named "staff" that have made Arthur look dangerous for almost 2 years to be with Jane in her room, talking to her on the phone, walking Jane down the hall and even with the food Arthur used to bring Jane. Under Logie, the staff were told to listen in on Jane and Arthur's phone calls, listen at Jane's door and also through the intercom system in Jane's room when Arthur was in Jane's room or when Arthur used to call Jane.
58. The court, guardians, their lawyers and jaskowiak have refused Arthur to know the monitors (hired by Blumer) their abilities to listen accurately, take notes accurately and make accurate quotes for legal purposes pertaining to their claims of what Arthur supposed to have said or did not say during a visit. Only highly trained stenographers can do such work. Their "reports" have always been handwritten, never typed, and hardly readable because of their poor quality handwritings.
59. Arthur has had to state over and over the monitor's reports constantly had lies in them to make Arthur look bad. By increasing the number of reports containing lies about Arthur, the Plan by guardians, their lawyers, jaskowiak and the court wanted to eventually ban Arthur from ever seeing his Mother again as a punishment for exposing the scam on his Mother and many other victims by those people.
60. Ledakis claims Jane has alzheimers in his original report. But, Arthur proved and ledakis admitted Ledakis had no independent proof of the accuracy of the "evaluation" he used. About June 2023, Arthur found out that there are many side effects with alzheimers. One of them is agitation. There is a website about people who have agitation because of alzheimers. Just like only blaming Arthur's food for causing Jane's legs to be swollen without looking for other possible causes. For about 1.5 years the guardians, jaskowiak and weilheimer have claimed it was Arthur's total fault for Jane being "agitated" (without any named persons), in fact it was probably also the alzheimers. But, what person, at 96, would want to be kidnapped, put through 2 weeks of hell, not allowed to go home to live, starved and tormented, had to go to the hospital for 6 weeks, confined to bed and put through 6 weeks of hell at the hospital, get covid where an elderly person could have died, denied seeing their child on a regular basis and then dumped into a tiny room, in a pig pen and locked down into solitary confinement? Would anyone, at any age be happy about THAT?
61. About February 2023, the court praised jsh and allowed jsh to visit Jane as often as she wanted and for any length of time. Is this court aware of what torture and torment jsh put Jane through for two weeks and because of that, Jane had to spend six weeks confined to bed, getting blood tests, other very painful tests and got covid where Jane could have died? But, jsh was "rewarded" with no restrictions of visits.
62. Arthur has been constantly harassed, for over 1.5 years, with here say gossip, without a bit of substance to it, causing both Arthur and Jane mental anguish, especially at Jane's sensitive age of 98. That here say gossip has cost Arthur very expensive legal bills, wasted time and expensive monitor fees that Arthur cannot afford.
63. Arthur has spent a lot of money, for the past two years, to get Jane back home or at the very least, to see Jane at the nursing home. He spent a lot of money for gas, gifts, flowers, newspapers and magazines. Arthur has to travel a great distance to see Jane in the nursing home, instead of Jane being at her home where Ledakis said she could live without problems as long as Arthur was there.

64. Blumer, in 2022, canceled Arthur's Christmas, Thanksgiving and other visits with Jane, no reason given. In 2023, Blumer canceled Easter, Good Friday, Valentines Day, Jane's birthday and Mother's Day for Arthur and his Mother, no reason given. Those very Christian, personal and happy days missed cause extreme sadness for both Jane and Arthur, especially at Jane's tender age of 98. Is blumer acting the way a guardian of anyone should be treating someone?
65. All records from the hospital and from Manatawny Manor have always been denied to Arthur to know about his Mother's condition. Jane has always wanted and given permission to others for Arthur to have all information about her.
66. Arthur has always proven he has and will continue to love and care for his Mother as much as possible and will always protect her from harm, no matter where or how it happens. Jaskowiak filed fake charges against Arthur in December 2021 and December 2022 and put Arthur into prison both times because Arthur was exposing the guardianship scam on his mother and many others. Jaskowiak never asked Jane, his client, if she wanted that. People get murdered in prison. Is that what weilheimer and the others wanted to protect their scam.
67. Just before prison in December 2022, weilheimer and jaskowiak forced Arthur to sign a letter to Amazon telling them to delete Arthur's original website exposing the scam that amazon had archived. The racket wanted Arthur to do so to protect their scam. My current website about guardianship corruption is www.protectmyparents.us
68. In November 2021, Arthur contacted the Montgomery County DA's office about the scam. He had a meeting with one of their detectives, Shade. Arthur gave Shade many documents and spent about 2 hours talking to him. Arthur also had many other people who had their loved ones in corrupt guardianships call Shade. Shade never returned their calls. He contacted weilheimer and told her that I tried to file a criminal complaint against her. About a month later, weilheimer put me into prison. Shade retired 3 weeks after that.
69. Also, in November 2021, Arthur contacted the local FBI. He spent about 2 hours talking to Agent Pacchioli and gave him many documents. Arthur also told the other victims of guardianship corruption. Pacchioli closed the case in June 2023 and never returned those other victims calls.
70. In about May, 2023, weilheimer had Olivieri block Arthur's ability to use his docket to review documents.
70. In later June 2023, weilheimer had the county IT person, Olivieri, block Arthur's email address to all of the county agencies to further punish him and block any contact with those agencies, including the county court house. Calls to Helene Sepulveda (orphans court supervisor) and to Olivieri are never returned and when Arthur stops to see them, he is told they are on the phone or not in.
71. It was only Arthur who called for wellness checks after Jane was kidnapped by jsh, called paramedics within a day after Mother's legs became extremely swollen, continued to complain about the lack of care to Jane's legs, bought Jane no-slip socks after Jane fell, keeps trying to get Jane a medic alert necklace like she had for many years but was canceled by Logie, keeps trying to get a phone in her room so her friends can call her and she can call them, get Jane to her original doctors for Jane's health, get Jane back home so she can enjoy her loved possessions at 98 years old and more so Jane can be happy again. Jane is entitled to enjoy her life.
72. It has only been Arthur that continues to try to keep Jane mentally happy and as active as possible so Jane's physical and mental health does not deteriorate. Arthur knows and has been told by Jane many times she wants to go back home to live, which is still quite possible, so she can continue to live as active as she was two years ago before Jane was forcibly taken away from her house and her life as she had been living it. Jane wants to continue to enjoy her daily life and her very much loved possessions before she either dies or becomes physically or

medically disabled.

73. About 3 months ago, Arthur could not afford his paid visits with Jane, which has caused her much sadness and emotional distress being there all by herself in her room. Jane does not know why, at her advanced age, why the son she loves deeply and the son she thought loved her does not want to see her. Jane is not told why Arthur is not allowed to see her or call her because he just does not have the money to pay monitors to see her.
74. Arthur has PROVEN that he, being with his Mother, after about 5 months of 3 paid visits a week of being watched and listened to by 2 different monitors sitting next to him, before that for about 5 months of being very closely watched and listened to by staff in the TV room and before that being listened to by the staff at Jane's door, on the phone with Arthur and through the intercom in Jane's room during Arthur's visits, Arthur has proven, beyond any doubt, ANY claims, of ANY type of "agitation" to his Mother, since such accusations were first started by person or person's unknown, has only been at best empty hearsay by mean spirited staff. Jaskowiak, guardians and their lawyers know here say has no value in a court of law and at best is just old ladies gossip. Any such distribution of such empty here say is slander and defamation of character.
75. Jane NEVER requested Arthur to leave, NEVER denied him visits and NEVER refused any of Arthur's twice a day phone calls. The fact is, no one EVER asked Jane if Arthur was getting her upset in any way. Jane was constantly telling Arthur about the problems the staff and the place was causing her, including constantly stealing from her room. Jane knew she could depend and trust Arthur to take care of her and any problems she was having.
76. Arthur demanded various punishments (prison, fines, restrictions of visits) to end by weilheimer and created and pushed by jaskowiak. Neither jaskowiak or weilheimer have ever asked Jane if that is what she wants for Arthur, since only Arthur has been protecting his 98 year old mother when the guardians and her court assigned lawyer, jaskowiak, refuse to protect and serve her as the law says they must. Arthur has demanded weilheimer remove all restrictions on him now, pertaining to visits with Jane. Restrictions were imposed, starting in August 2021, because Arthur had exposed the "evaluation" used to decide incapacitation by the court's hand picked psychologist Ledakis, was a fraud. By Arthur exposing that fraud, not only on his Mother, but also on thousands of other elderly people in Pennsylvania. By Arthur exposing such a massive fraud, tens of thousands of lawsuits will be filed against lawyers and law firms because they never did their due diligence and asked not only Ledakis, but all of the other psychologists who gave fake evaluations just for money. That fraud has put tens of thousands of elderly people in nursing homes to die: broke and drugged. Those penalties and prison, by weilheimer and jaskowiak, were using the court as a weapon, only because Arthur refuses to be in the racket to steal money from his Mother, as his sister jsh is, has been doing and allowing others in the racket since the petition was filed in May 2021. Punishment restrictions included removing all limits of how many days Arthur can be with his Mother, all restrictions of time with his Mother and where Arthur can take his Mother during the day. Arthur will be allowed to call his Mother again any time. There will be no more paid or unpaid monitors. Day and time restrictions were removed from jsh several months ago by this court. The court has been fully aware of what jsh had done to Jane while being held in captivity by jsh.
77. Fenstermacher had a legal obligation to know all of that information about this scam of guardianship, but he does not seem to be aware of it or if he does, he has refused to act upon it and file legal motions and petitions to stop the financial, physical and mental abuse on Jane, his client.
78. Jane always retained the right to deny either child visits and phone communications. On the contrary, Jane has made it clear she wants to go back home to live as she was living: happy and healthy and with her loved son Arthur. Fenstermacher has never acted as her guardian of the estate because he admitted in court, in about February 2023, that he had not seen or talked to Jane in about 2.5 years. That is violating many rules for a lawyer in Pennsylvania regarding how a lawyer must act with a client.

79. Fenstermacher is making decisions for Jane, without consulting Jane, that have drastic ramifications. They include evicting Arthur (contrary to what Jane wants), then trashing all of her loved possessions of 98 years because she has no room to put anything in her tiny room at MM. Unless the guardians move Mother to a much larger place or she goes home (which Arthur has tried to do many times, but has always been denied by guardians, their lawyers and Jaskowiak), then Jane's loved possessions will have to be trashed. Then, Fenstermacher will sell her house when there is no financial need at this time.
80. Jane has done no crime to have been forced away from her perfect life just because, first her daughter Jsh, then the others in the racket want Jane's house and money for themselves.
81. For 10 years since Jane's husband died, Jane has generously given each child \$14,000 a year to cover birthday, Christmas and Easter. Because of Arthur being on welfare for over a year because of his money spent on lawyer fees to get Jane home, Arthur asked Fenstermacher for a little more so he can make ends meet. Fenstermacher refused only because of his hate for Arthur because Arthur exposed to Jane years earlier how Jsh and F Fenstermacher were working together to steal Jane's money. Now, Fenstermacher is doing anything he can to punish Jane and Arthur by allowing the others in the racket to steal Jane's money and to deny her son, Arthur, a little extra money to live on and refusing to consult Jane in legal matters as the law in Pennsylvania says guardians must do in guardianship matters for those who were legally deemed incapacitated.
82. By spending unlimited time with Arthur, going and doing most of the activities Jane used to do before guardianship, there would be unlimited benefit to Jane for her physical health, mental health, memory and most importantly, her happiness at age 98. All studies have proven sadness and loneliness causes severe harm and decrease to cognitive abilities to people with memory issues. Fenstermacher refuses to demand Blumer (Jane's guardian of person) treat Jane as a human being, instead of a caged animal.
83. I have been trying to get Mother a permanent telephone in her room, a medic alert system (which Jane had at home) and removal of any food restrictions that Blumer put in place on Jane about 9 months ago, without any justification. Those foods that Blumer denied Arthur to give to Jane, Jane is/was fed every day at Manatawny Manor. Jane was NEVER on any diet restrictions and Jane NEVER had any food allergies. Fenstermacher has refused to care about Jane's basic happiness pertaining food and snacks she could be eating in her later years in life.
84. Arthur voluntarily did not give Jane any food since about September 2022, but the swelling in Jane's legs never reduced, in fact her legs got much worse. Arthur was the only one who noticed it and filed a police incident report about it. Thus, proving to all, Arthur's lunches and other food he gave Jane NEVER caused Jane's legs to swell. Fenstermacher has refused to get involved with his client's welfare and happiness.
85. Arthur noticed and reported, on a regular basis, to the director of Manatawny Manor and to his former attorney that the staff and Blumer were not enforcing the directions of the house doctor who directed them to put compression socks and a special crême on Jane's legs every day. Such cheap and empty accusations (lies) against Arthur that he caused Jane's legs to swell were started by Logie about December 2021 and have been continued by Blumer only to create a negative image of Arthur to be used against him in various ways. Fenstermacher has refused to know about these matters that affect his client at her age of 98.
86. In addition, the other lie that has been constantly stated by Blumer, her lawyer, Logie and the never named "staff" that has been used against Arthur for punishment, is that Arthur gets his Mother "agitated" after his visits or his phone calls he used to have with his mother, before Blumer canceled the phone calls about May 2022. Fenstermacher refuses to know about this problem involving his client as her guardian.

87. The fact is, there are several commercials on TV that sell various pills that are for people with alzheimers and have agitation from alzheimers. Therefore, ALL of the claims made against Arthur as causing any such "agitation" to his Mother, but NEVER proven in any way, is pure slander. Again, no body ever asked Jane if Arthur got her "agitated".
88. Those lies of blaming Arthur's food causing Jane's legs to be swollen and claims of causing "agitation" to Jane by others, have been used against Arthur and his Mother. Both he and his Mother have been severely punished because of those lies by weilheimer, jaskowiak, pam blumer, her lawyer gelsinger and camp. Fenstermacher does not want or care about the matter of his client.
89. Arthur has NEVER been formally charged, at any time, with any "agitation" type offense to his Mother. If he was, he would have had the chance, under U.S. law, to face his alleged accusers and had a formal hearing/trial in court where Arthur would have been able to have Jane there as his witness to confirm Arthur NEVER did anything to cause Jane distress and would have had other witnesses and various types of documents to prove his innocence. Fenstermacher is not or does not care about knowing what involves his client
90. Since no such hearing/trial ever took place, because no person ever stepped forward to say so or even put their accusation on any reports and under oath, than this entire fairy tale called "agitation" must stop and be trashed forever. Fenstermacher has never known or if he did know about the matter, he simply has believed what the racket and his close friend, jsh, has told him
91. The fact remains, that any "agitation" Jane had and has now, can certainly be blamed on what was done to her by THEM: guardians, lawyers, court and jsh, who started the entire guardianship scam on my Mother just so jsh could get her mother's money and house for herself. Those type of attempts to steal Jane's money had been done before by jsh and current guardian of estate Fenstermacher, but Arthur stopped them.
92. About 2016, jsh and Fenstermacher created a delegate authority for Arthur and jsh to sign. Fenstermacher and jsh worked together on that. It said Arthur was to be in charge of Mother's house repairs, car repairs and Jane's health, but jsh was to be in total control of Janes fortune. Neither of them ever discussed the matter with Jane. Jane had no problems with her health or financial matters that she needed anyone to control them for her. Arthur refused to sign it.
93. About 2020, jsh had hired a lawyer for something. She tried to get Jane's investment company to write a check from Jane's account to pay jsh back. Fenstermacher told Jane's investment company it was alright to do so. None of those people ever talked to Jane about it. By accident, I found out about it, told Mother about what they were trying to do and Mother told them no.
94. As a matter of fact, in May 2020, Fenstermacher sent a letter to Jane telling her I was lying to her when I told my Mother that jsh wanted to put her into a nursing home and sell her house. Fenstermacher told my Mother that jsh had no power to do so. He lied. About May 2021, a year later, Fenstermacher told jsh to go to the lawyers down the hall from him and file a petition for guardianship on Jane so jsh could get what she wanted. Jsh did exactly that. Jsh admitted in court she never discussed such a serious matter with Jane.
95. "Agitation"? What 96 year old woman or man, who was living for 21 years in their large, beautiful, 3 bedroom, 3 bathroom house, in a private gated community for the past 21 years, with their beautiful possessions of 98 years, living extremely happy and healthy every day, then kidnapped for no reason, forced to stay at her daughter's house who she does not like, denied to leave, denied to see or call her son, put through 2 weeks of torture and torment by the daughter, after about 2 weeks had to be taken by ambulance, unconscious,

to the hospital, confined to bed for 6 weeks, treated for starvation, not allowed to see or call her son for a month, given daily blood tests (42 times), given painful daily needles in the stomach to prevent blood clots (42 times), gets covid where she could have died, then dumped into a very low rated nursing home that had just reopened from a major covid outbreak, gets covid again because of another covid outbreak where she could have died, gets influenza from an influenza outbreak where she could have died, forced to live in a very tiny room, kept in solitary confinement, in a sensory deprived environment, has not been allowed outside for almost 2 years, has not been allowed to see their doctors for about 2 years, not allowed to have a phone in her room, not allowed to see or call her loved son on a regular basis, not allowed to have ministers to see her, not allowed access to any reading material (unless her son brought them), not allowed phone calls to and from her friends, not allowed to see her home and her loved possessions, etc? "Agitation"? I wonder why?

96. Fenstermacher has legal requirements and legal obligations as a guardian, as Jane's trust lawyer of 21 years and also to his other client, Arthur. With Arthur, it involves how much, if any, inheritance Arthur, will get when Jane dies. Fenstermacher has simply allowed the racket to run wild with how they hire as many people they want and to bill Jane for "services" that are never performed, which also affects how much inheritance Arthur might get. Fenstermacher never did his due diligence to know about what he is involved in, both as Jane's lawyer and her guardian of her estate. Fenstermacher has allowed his 98 year old client to live worse than a homeless person, allowed Jane's mental, physical and psychological health to dwindle years ahead of its time, Jane had to start using a cane about 5 months ago because she has not been allowed to have any physical activity because she has been locked in a section in solitary confinement, in a sensory deprived environment, Fenstermacher, because of his hate for Arthur, is allowing the racket to deny Jane seeing and being with her son, allowed Jane's assets to be drained, basically refused to be involved in this guardianship matter and to know what is going on as his client is being denied the basic happiness in life.

Fenstermacher cannot be allowed to be a lawyer and to ruin people's lives

Ronald Fenstermacher, Jane Herring's Guardian of Estate

- 1. As of June 12, 2023, the following statements are true and correct to the best of my knowledge.**
- 2. Guardian of Estate to Jane, ronald fenstermacher, has constantly refused to carry out his responsibilities and obligations under the law as a guardian appointed by the court and as a lawyer to Jane of about 21 years.**
- 3. Fenstermacher was appointed Guardian of the Estate to Jane in about May 2022, replacing logie.**
- 4. Fenstermacher has refused to stop the financial squandering of Jane's estate and Arthur's future inheritance by allowing Jane to be kept in a tiny pig pen, in solitary confinement, in a sensory deprived environment at \$90,000 a year.**
- 5. The cost of Jane living at home was established by the court of \$16,500 a year.**
- 6. Arthur has found many much nicer, much bigger and much cheaper places for Jane to live, but both guardians refused to let Jane stay at home (as the ledakis report #1 said she could) or in those much better places. No reason given by them.**
- 7. Fenstermancher has refused to tell blumer that there was no agreement signed that blumer could charge Jane, fenstermacher's client and guardian, people blumer hired as her staff, including many lawyers and care manager klock that blumer has kept on for Jane, at Jane's expense, but who was originally hired by logie.**
- 8. Fenstermacher has refused to follow Jane's wishes of what she would want (if she was asked by fenstermacher) for her son Arthur, which includes Arthur staying in her house for free and getting the house after Jane dies.**
- 9. Fenstermacher has refused to be concerned, as a part of Jane's guardianship, to be aware of the physical, medical, mental and financial harm blumer has been doing to Jane for a year since she was appointed Guardian of Person of mother.**

10. Fenstermacher signed off to sell Jane's house about 6 months ago and to evict Arthur, all against what Jane would want for herself and Arthur if Jane was asked by Fenstermacher.
11. If Fenstermacher and the others keep Jane in her current very expensive, tiny pig pen and sell Jane's house, then all of her loved possessions, of the past 98 years, would have to be trashed since there is NO room in her tiny pig pen to put even a vase of flowers, let alone anything of Jane's possessions.
12. How is Fenstermacher following the requirements and obligations as a guardian for Jane, his client.
13. There are no tables or closet space in Jane's pig pen. Jane basically has to put most of her things on the floor in plastic bags.
14. Fenstermacher admitted in court he has not seen or talked to his client Jane, her Guardian of Estate, for about 2.5 years, but he is making drastic decisions for her without discussing them with her and violating state law of PA.
15. Fenstermacher's refusal to discuss and act on his client's wants and wishes, clearly violate his obligations and requirements as her Guardian of Estate and her trust lawyer.
16. If Fenstermacher fails to consult with his client, he will be also violating his oath when he became a lawyer, mainly to do what Jane wants as his client, as much as possible and if he does not want to do so, he can quit as her lawyer.
17. If Fenstermacher sells Jane's house, unless he or Blumer find Jane another place to live where she can keep some of her loved possessions, all of them, including valuable antiques, will have to be trashed since there is absolutely no room in her current pig pen to keep anything and there are no tables to put things on.
18. According to the best available information, Jane's house is worth about \$450,000. According to a financial statement from Jane's investment company, Raymond James, from about 4 years ago, Jane had about \$1.8 million.
19. Why is Fenstermacher allowing Jane to pay for Blumer and her hired help that, were never approved to be hired, but Jane has to pay them? Fenstermacher allowing Blumer to do that is constantly depleting Jane's assets, instead of saving

Jane's money by having her taken back home as ledakis said she could stay in his report #1.

20. Fenstermacher, as guardian of the estate, refuses to get involved with managing Jane's money now and Arthur's future money as his inheritance.
21. Fenstermacher is refusing to manage blumer's lawyers massive spending of Jane's funds when it is obvious those lawyers are simply making up wasteful billing hours for themselves and their law firm.
22. The court has accepted the cost of Jane's home per year is about \$16,500, including property tax, homeowners fees, insurance, etc. Why is Fenstermacher refusing to save Jane the massive amount of money by taking her out of the pig pen and letting her live at home?
23. Why has fenstermacher, who is in charge of Jane's money and future inheritance of Arthur, refusing to order blumer to stop wasting Jane's money and if Jane cannot go home, demand blumer find Jane a much nicer, much bigger and much cheaper place to live since blumer is the guardian of person of Jane and is responsible to where Jane lives and how she lives?
24. I have found many much bigger, much nicer and much cheaper places for Jane to live (if not at home), but Fenstermacher has refused to act, especially for Jane's happiness and in case she may need the money for any future medical issues, such as a stroke.
25. Living at home, if Jane ever needs extra help is far, far cheaper than Jane being forced to be kenneled in her current pig pen by blumer, jaskowiak and fenstermacher.
26. While fenstermacher, jaskowiak, blumer and other lawyers of their picking continue to live in luxury from Jane's money, Jane is forced to live worse than a homeless person. A homeless person has the ability to enjoy their life and their freedom. My Mother, under the ownership of blumer, fenstermacher and jaskowiak for the past 2 years, does not have any freedom or enjoyment of life at age 98.

9. Email I sent to Fenstermacher pointing out his wasting of Jane's money to have her kept in a prison type, locked in section in her very tiny room at \$90,000 a year when Weilheimer's hand picked "expert" Ledakis said that Jane had no problems living at home and with Arthur living there for over a year, everything was going fine. The court accepted cost of Jane living at home is only \$16,500 a year. That would be a huge savings to Jane. I also pointed out that Fenstermacher is allowing massive waste of unproveable billing hours by pam blumer and her army of lawyers and care manager, Deb Klock, when no contract was ever signed that she could spend Jane's money in any way Blumer could think of. That is basic contract law. All expenses incurred by Blumer are hers as part of doing a business. Those expenses, like others have in their business, are deducted from profits as a business. I also told Fenstermacher that I need the yearly gift money that Jane always gave Arthur every year to pay rent and to live. I also stated that Fenstermacher is refusing to return the calls of landlords who want to verify that they would be paid if I rented an apartment.
10. Fenstermacher signing off to evict Arthur, sell Jane's house which will mean trashing all of Jane's loved possessions of 98 years. NONE of the guardians, their lawyers, care manager Klock, Weilheimer's appointed lawyer to Jane, Jaskowiak, and jsh want Jane to go home or to a much bigger, much nicer and much cheaper place where Jane could have some of her loved possessions. Only Arthur has been trying to get Jane back home, as Ledakis said in his first "evaluation" of Jane and also has found many other much nicer, much bigger and much cheaper places for Jane to live. Fenstermacher admitted in court in about February or so 2023 that he had not talked to Jane or seen her for 2.5 years. But, he was making decisions for her without asking her or discussing them with her. Fenstermacher is breaking the Pennsylvania rules for lawyers.

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

NO. 2011-0110

IN RE: JANE HERRING
AN INCAPACITATED PERSON

STATEMENT OF OBJECTION

I, Ronald W. Fenstermacher, Jr., Esquire, trustee of the Jane T. Herring Trust, hereby state that I have no objection to the Petition for Protection filed by David A. Jankowski, Esquire, court-appointed counsel for Jane Herring, and do not oppose the relief sought in that petition.

Respectfully submitted,


Ronald W. Fenstermacher, Jr., Esquire
Trustee of the Jane T. Herring Trust

Case# 2021-XZ110-29 Received at Montgomery County Register of Wills Office on 01/15/2022 3:27 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.

4.

52. Denied. Arthur misstates Respondent's response to his question.

Arthur made the statement he includes in this paragraph, but Respondent did not agree with that statement.

53. Denied. This paragraph simply contains a phrase lacking any sort of meaning to which a response may be formulated and so is denied.

54. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

55. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

56. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this Paragraph.

57. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this Paragraph.

58. Denied. Respondent met with Arthur and Arthur's former attorney in an attempt to negotiate an agreement for Arthur to move out of Jane's house. Arthur refused even to consider moving out of Jane's house and so no agreement was reached.

59. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

60. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied. By way of further response, Arthur is asking a question rather than making an averment in this paragraph.

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

NO. 2021-X2110

**IN RE: JANE T. HERRING
AN INCAPACITATED PERSON**

**RESPONSE OF RONALD W. FENSTERMACHER, JR. TO THE PETITION OF
ARTHUR HERRING, III TO COMPEL RONALD FENSTERMACHER TO MAKE
COMPENSATION TO ARTHUR HERRING III AS PROMISED FOR LIVING
ACCOMMODATIONS**

Respondent Ronald W. Fenstermacher, Jr., Plenary Guardian of the Estate of Jane T. Herring ("Jane"), an incapacitated person, files this Response to the Petition of Arthur Herring, III, ("Arthur") to Compel Ronald Fenstermacher to Make Compensation to Arthur as Promised for Living Accommodations (the "Petition") and in furtherance thereof avers as follows:

1. It is admitted that this Court has jurisdiction and venue over this matter.
2. It is admitted that Jane has two adult children, Jill S. Herring and Arthur Herring, III.
3. Admitted in part and denied in part. It is admitted that Arthur is retired. Respondent lacks knowledge or information sufficient to form a belief as to whether Arthur has been living in his car. The remaining allegations of this

paragraph, together with much of Arthur's Petition, seek to relitigate issues previously ruled upon by the Court and are denied.

4. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph. It is denied that Jane had no problems prior to the Guardianship proceeding based upon the evidence and testimony already before this Court.

5. Denied as a conclusion of law to which no response is required.

6. Denied as a conclusion of law to which no response is required.

7. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

8. Admitted in part and denied in part as stated. Respondent has been Guardian of Jane's Estate since May 2022. Respondent was Jane's attorney for many years, but Jane is now represented by David A. Jaskowiak, Esquire, who was appointed by this Court. Respondent is the Trustee of Jane's Trust under her Agreement of Trust.

9. Admitted.

10. Denied as a conclusion of law to which no response is required.

11. Admitted.

12. Denied. Strict proof is demanded at trial.

13. Denied. Strict proof is demanded at trial. By way of further response, Arthur attempted to fire Respondent as Jane's attorney when Respondent refused Arthur's request to write a new will for Jane favoring Arthur over his sister.

14. Denied. Respondent has never represented Arthur in any matter and so could not have been fired by him.

15. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph.

16. Denied as stated. Arthur has sent many, many harassing emails to Respondent in which he attempts to relitigate issues previously ruled upon by the Court and in which he libels Jane's guardians, the attorneys involved in this matter, and the Court.

17. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

18. Denied as stated. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

19. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

20. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

21. Denied. The allegations of this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

22. Denied as stated. Respondent has advised Arthur that he will not respond to Arthur's attempts to relitigate issues previously ruled upon by the Court through his libelous emails.

23. Admitted in part and denied as stated. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph regarding gifts directly from Jane to her children. Admitted that Respondent has made gifts on behalf of Jane from her Trust to her children.

24. Admitted.

[The Petition as filed contains no paragraphs numbered 25 through 37].

38. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph.

39. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

40. Denied as stated. Arthur is asking a question rather than making an assertion. By way of further response, this paragraph seeks to relitigate issues previously ruled upon by the Court and are denied.

41. Denied as stated. See response to 40, above.

42. Denied as stated. See response to 40, above.

43. Denied as stated. See response to 40, above.

44. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied. By way of further response, Arthur has acted at all times for his own interests and not for Jane's interests.

45. Denied as stated. See response to 44, above.

46. Denied as stated. See response to 44, above.

47. Admitted in part. It is admitted as to approximate values.

48. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

49. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

50. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

51. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied.

52. Denied as stated. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph.


53. Denied. Respondent lacks knowledge or information sufficient to form a belief as to the averments in this paragraph.

54. Denied as stated. Arthur is asking a question rather than making an assertion.

55. Denied as stated. The averments in this paragraph seek to relitigate issues previously ruled upon by the Court and are denied. By way of further

response, Arthur has acted at all times for his own interests and not for Jane's interests.

WHEREFORE, Respondent respectfully requests that this Honorable Court dismiss the Petition to Compel Ronald Fenstermacher to Make Compensation to Arthur Herring III as Promised for Living Accommodations.



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12/4/23