Law Offices

DAVID A. JASKOWIAK

ATTORNEY AT LAW
815 GREENWOOD AVENUE
SUITE 14
JENKINTOWN, PA 19046

(215) 886-7720 Fax (215) 886-7728 davidjas@davidjaslaw.com

June 29, 2023

USPS First Class Mail

Thad M. Gelsinger, Esquire Barley Snyder 2755 Century Boulevard Wyomissing, PA 19610

USPS First Class Mail

Ronald Fenstermacher, Esquire Four Tower Bridge 200 Barr Harbor Drive Suite 400, PMB 8849 West Conshohocken, PA 19428 USPS Certified Mail, return receipt requested USPS first class mail

Arthur Herring, III 26 Chancery Court Souderton, PA 18964

USPS First Class Mail

Brittany J. Camp, Esquire Heckscher, Teillon, Terrill & Sager, P.C. 1001 Conshohocken State Road Suite 1-300 West Conshohocken, PA 19428

RE: <u>Estate of Jane T. Herring, an Incapacitated Person</u>
Montgomery County OC NO. 2021-X2110

Dear Counsel and Mr. Herring,

Enclosed please find the Motion for Order Directing Sheriff Regarding Eviction Procedures and the Praecipe to Attach Notice to Plead in the above-captioned matter which have been filed with the Court. Kindly file your response, if any, within twenty (20) days or the Court may deem that you have no objection to the relief requested therein and may grant such relief without further notice to you.

Thank you.

Very truly yours,

DAVID A. JASKOWIA

DAJ/oa Encl.

Court of Common Pleas of	_	mery County Orphans' Cot R SHEET	irt Division	
1A. Does this matter already have an Orphans		1B. Orphans' Court Number/R	Register of Wills Number	
number or Register of Wills number? Yes	·		2021-X2110	
2. Name of Estate/Entity (e.g.: Name of Deced	dent or De	cedent's Estate)		
3. Type of Estate/Entity				
4. Name of Filing Party (not Attorney for Filing JANE T HERRING		NSHIP)		
5. Filing Party's Relationship to Estate/Entity	#1L#11	TO THE STATE OF TH	*****	
6A. Name of Self-Represented Party or Attorney for Filing Party. DAVID JASKOWIAK	6B. Address of Attorney (or Filing Party, if not represented) 815 GREENWOOD AVENUE SUITE 14 JENKINTOWN, PA 19046			
7A. Phone Number	7B. Fax Number			
(215) 886-7720	(215) 886-7728			
8A. Supreme Court ID Number of Attorney 49753	8B. E-Mail Address davidjas@davidjaslaw.com			
9. To the Clerk of the Orphans' Court:	E - C + L - 1		_	
Kindly enter my appearance on behalf			10A. Date	
10. Signature of Attorney (or if unrepresented, signature of Filing Party) By eFiling a legal paper, I will be considered to have signed this cover sheet and, if I am an attorney, to have entered my appearance for the party on whose behalf I am eFiling this legal paper.			6/28/2023	
11. If this filing responds to a prior filing, pleas this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6)			l er of the filing to which	
12. Other Parties: PLEASE ATTACH A SEPARATE SHEET LISTING T UNREPRESENTED PARTY, AND THE NAME OF AND TELEPHONE NUMBER OF THAT PARTY'S	EACH REP	RESENTED PARTY, TOGETHER W		
13. Pleading or Document filed (Please select i	from list o		copa.org/forms or	
available from the Clerk of the Orphans' Court):			
Motion				
14. PLEASE SELECT ONE (AND ONLY ONE) OF T	HE SPECIF	FIED TYPES OF FILINGS:	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Notice				

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

ORDER

AND NOW, this _______, 2023, upon consideration of the Motion for Order Directing Sheriff Regarding Eviction Procedures and the responses thereto, the Court enters the following Order:

- The Montgomery County Sheriff's Office is hereby authorized and directed to evict Arthur Herring, III, from the property owned by Jane T. Herring at 26 Chancery Court, Souderton, PA.
- 2. The Sheriff shall serve this Order upon Arthur Herring, III, at 26 Chancery Court, Souderton, PA promptly upon being provided with a copy of it and payment of any fees associated with the eviction process. In the event that Arthur Herring, III, is not present when service is attempted, proper service is made by posting a copy of this Order on the front door of the residence, taking a picture of that posting and keeping it in the Sheriff's file for later review by the Court if required. An Affidavit of Service shall be prepared as to the date, time and manner of service of this Order and that Affidavit shall then be provided to David A. Jaskowiak, Esquire, and Ronald W. Fenstermacher, Jr., Esquire, by email and/or first class

mail as soon as practicable. The contact information for each attorney is:

David A. Jaskowiak, Esquire 815 Greenwood Avenue, Suite 14 Jenkintown, PA 19046 (215) 886-7720 FAX: (215) 886-7728 davidjas@davidjaslaw.com

Ronald W. Fenstermacher, Jr., Esquire Law Office of Ronald W. Fenstermacher, Jr., PC Four Tower Bridge 200 Barr Harbor Drive, Suite 400, PMB 8849 West Conshohocken, PA 19428 (484) 253-8544 rfenstermacher@fenstermacherlaw.com

- 3. The Sheriff is authorized to take pictures of the premises, at the time of the service of this Order and to allow David A. Jaskowiak, Esquire, and/or Ronald W. Fenstermacher, Jr., Esquire, to take pictures of the premises, including the interior, as well.
- 4. Arthur Herring, III, shall have fourteen (14) days after service of this Order to vacate the premises and shall turn over the keys to the premises to David A.

 Jaskowiak, Esquire, and/or Ronald W. Fenstermacher, Jr., Esquire, when he vacates. If Arthur Herring intends to vacate the premises prior to the aforesaid 14 days, he shall notify the Sheriffs office in advance and advise when he intends to vacate. Arthur Herring, III, shall also advise Attorneys Jaskowiak and Fenstermacher by email of the date when he intends to vacate.
- 5. On the 15th day after service of this Order, the Sheriff is authorized to remove Arthur Herring, III, from the premises. The Sheriff shall notify Attorneys

Jaskowiak and Fenstermacher of the date and time when eviction is scheduled. Jaskowiak and Fenstermacher shall be present with the Sheriff at the premises when Arthur Herring, III, is evicted and shall bring a locksmith to change the locks on the premises.

- 6. The Sheriff is authorized to use reasonable force, if necessary, to gain access to the premises and/or to remove Arthur Herring, III, from the premises.
- 7. Jane Herring's possessions shall not be removed from the premises. The prior October 7, 2022 Order of this Court relating to the subject of her possessions remains in full force and effect.
- 8. Similarly, Arthur Herring, III, shall remain responsible for any damage to the premises. The prior October 7, 2022 Order of this Court relating to the subject of damage to the premises remains in full force and effect.
- 9. The Sheriff is authorized to utilize the resources of local law enforcement if necessary to ensure Arthur Herring, III's, full compliance with this Order and his peaceful departure from the premises.
- 10. Any failure by Arthur Herring, III, to comply with the terms of this order may result in the imposition of sanctions, including a finding of contempt, monetary sanctions and/or incarceration if appropriate.

SO ORDERED.

BY:

GAIL A. WEILHEIMER, J.

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

MOTION FOR ORDER DIRECTING SHERIFF REGARDING EVICTION PROCESS

David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, and Ronald W. Fenstermacher, Jr., Esquire, Guardian of the Estate for Jane Herring, hereby move this Honorable Court for the entry of an Order directing the Montgomery County Sheriff regarding the steps authorized to be taken in executing the prior eviction Order of this Court dated October 7, 2022. Movants state the following in support thereof:

- Movants are David A. Jaskowiak, Esquire ("Jaskowiak"), court-appointed counsel for Jane T. Herring, an incapacitated person, and Ronald W. Fenstermacher, Jr., Esquire, ("Fenstermacher"), Guardian of the Estate for Jane Herring.
- On October 7, 2022, this Court entered an Order directing that Arthur Herring, III,
 ("Arthur") vacate the property owned by Jane Herring at 26 Chancery Court, Souderton,
 PA, no later than November 17, 2022. <u>See</u>, Exhibit "A."
- 3. Rather than vacate the property as directed by this Court, Arthur appealed the Order to the Pennsylvania Superior Court on November 8, 2022. See, Exhibit "B."
- 4. After numerous procedural delays, Arthur's appeal to the Superior Court was ultimately dismissed on May 8, 2023 when his Application for Reconsideration was denied. <u>See</u>, Exhibit "C."
- 5. No Petition for Allowance of Appeal was ever filed with the Pennsylvania Supreme

Court, and the time for any such further appeal, even if otherwise allowed, has now passed.

- 6. In order to effectuate the Court's October 7, 2022 eviction Order, the Montgomery

 County Sheriff's Department has requested clarification from this Court on the

 procedures which are authorized to be used to ensure that Arthur vacates the Chancery

 Court property. While the Sheriff has indicated that it intends to seek peaceful

 compliance, it requests direction from the Court regarding to timing and the extent to

 which the possible use of force and/or other law enforcement resources may be utilized if

 Arthur resists vacating the property in a timely and peaceful manner.
- 7. For the above-stated reasons, Movants respectfully request that the Court enter an Order substantially in the form attached to allow the Sheriff to implement the October 7, 2022 Order as expeditiously as possible.

WHEREFORE, Movants, David A. Jaskowiak, Esquire, and Ronald W. Fenstermacher, Jr., Esquire, respectfully request that this Court enter an Order in the form attached directing and authorizing the Montgomery Sheriff in the procedure to be utilized in evicting Arthur Herring, III, from the property owned by Jane Herring at 26 Chancery Court, Souderton, PA.

Respectfully submitted,

BAVID A. JASKOWIAK, ESQUIRE

Identification No.: 49753

815 Greenwood Avenue, Suite 14

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

davidjas@davidjaslaw.com

Court-Appointed Counsel for Jane T. Herring, an Incapacitated Person

Ronald W. Fenstermacher, Jr., Esquire

Identification No.: 60616

Law Office of Ronald W. Fenstermacher, Jr., PC

Four Tower Bridge

200 Barr Harbor Drive, Suite 400, PMB 8849 West Conshohocken, PA 19428

rfenstermacher@fenstermacherlaw.com

Guardian of the Estate of Jane Herring, an

incapacitated person

DATED: June 28, 2023

VERIFICATION

We, David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, and Ronald W. Fenstermacher, Jr., Esquire, Guardian of the Estate for Jane Herring, hereby verify that the statements made in the foregoing Motion are true and correct to the best of our knowledge, information and belief. We understand that false statements herein are made subject to the penalties of 18 Pa. C. S. § 4904 relating to unsworn falsification to authorities.

David A. Jaskowiak, Esquire,

Court-Appointed Coursel for Jane T. Herring, an Incapacitated Person

Ronald W. Fenstermacher, Jr., Esquire

Guardian of the Estate for Jane T. Herring, an

Incapacitated Person

Dated: June 28, 2023

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

CERTIFICATE OF COMPLIANCE

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

DAVID A. JASKOWIAK, ESQUIRE

Identification No. 49753

Suite 14

815 Greenwood Avenue

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

davidjas@davidjaslaw.com

Court-Appointed Counsel for Jane T. Herring, an

Incapacitated Person

DATED: June 28, 2023

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

CERTIFICATION OF SERVICE

I, David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, hereby certify that service of a true and correct copy of the Motion for Order Directing Sheriff Regarding Eviction Procedures in the above-captioned matter was served upon the following individuals in the following manner on June 28, 2023:

Electronic filing USPS first class mail Thad M. Gelsinger, Esquire Barley Snyder 2755 Century Boulevard Wyomissing, PA 19610 Counsel for Pamela Blumer, Guardian of the Person

Electronic filing
USPS first class mail
Brittany J. Camp, Esquire
Heckscher, Teillon, Terrill & Sager, P.C.
1001 Conshohocken State Road
Suite 1-300
West Conshohocken, PA 19428
Counsel for Jill Herring, Daughter of
Jane T. Herring

Electronic filing
USPS first class mail
Ronald Fenstermacher, Esquire
1001 Conshohocken State Road
Suite 1-311
West Conshohocken, PA 19428
Guardian of the Estate of Jane T. Herring

USPS Certified mail USPS first class mail Arthur Herring, III 26 Chancery Court Souderton, PA Pro se

DAVID A. VASKOWIAK, ESQUIRE

Identification No.: 49753

Suite 14

815 Greenwood Avenue Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

davidjas@davidjaslaw.com

Court-Appointed Counsel for Jane T. Herring, an

Incapacitated Person

DATED: June 28, 2023

EXHIBIT "A"

NO. 2021-X2110

IN RE: JANE T. HERRING, AN ALLEGED INCAPACITATED PERSON

ORDER

AND NOW, this day of October, 2022 upon consideration of the evidence presented at trial on May 11, 2022 and October 3, 2022 on the March 15, 2022 Petition for Eviction and the March 17, 2022 Second Petition for Contempt, for the reasons placed on the record, the following is hereby ORDERED and DECREED:

- 1. The Second Petition for Contempt is GRANTED. Arthur Herring, III is found in contempt for the willful failure to comply with this Court's May 21, 2022 Order. In light of the fact that Arthur Herring, III executed the attached agreement at trial ensuring payment of the underlying contempt fees, there will be no further penalty imposed for his contempt.
- 2. The Petition for Eviction is GRANTED.
 - a. Arthur Herring, III must vacate the property at 26 Chancery Court, Franconia Township, Souderton, Pennsylvania (hereinafter "the Residence") no later than November 17, 2022.
 - b. Should Arthur Herring III fail to timely vacate the property, the Guardian of the Estate may have him evicted by the Sheriff's office.
 - c. The Guardian of the Estate may change the locks on the Residence as of November 18, 2022.
 - d. Any damage to or destruction of the Residence that has occurred since August, 2021 will be attributable to Arthur Herring, III and the estate shall be reimbursed the cost to repair such damage from Arthur Herring's eventual inheritance from Jane Herring.
 - e. All of Jane Herring's personal property shall remain in the Residence.
 - 1. No one may remove Jane Herring's personal property from the Residence, regardless of the value, even if it is believed that Jane Herring intends for a particular item/items to be gifted to a particular individual.
 - 2. Distribution or sale of Jane Herring's personal property will be addressed by the Guardian of the Estate prior to sale of the Residence.
 - a. Should the parties be unable to agree on the distribution of personal property, such property shall be held by the Guardian of the Estate to be distributed after a hearing.

- i. The Guardian of the Estate shall file a petition requesting a hearing in the event of a dispute over personal property.
- ii. The cost for storage of any personal property pending the outcome of a hearing shall be paid by the estate.

J.

- f. The Guardian of the Estate shall receive Court approval for a Petition to Approve the Sale of Real Estate prior to transferring the Residence.
- g. Neither Arthur Herring, III or Jill Herring may discuss this Order, any other aspect of Jane Herring's Guardianship or any matter ancillary to the guardianship with Jane Herring.
 - 1. Failure to comply with this Order may result in Contempt proceedings the penalty for which could be incarceration and/or a monetary fine.

BY THE COURT

GAIL A. WEILHEIMER

Order e-filed Oct , 2022: Brittany J. Camp, Esquire David A. Jaskowiak, Esquire Victor Meitner, Esquire William Blumer, Esquire Ronald Fenstermacher, Jr., Esquire

-X2140-29.6.2-Received at Manigornery Gounty Register of Whis Office : on 06/28/2029 4:10 PM. Fee = \$64.00 IT herlien certifier that this gling complies with the previous of the Public Accessor... Affilial System Sylvenia Cess Received by the period of period and some control of the period of th

Dear Mr Fenstermacher, Dear 18 Mg Zabourg Ki Lagree that My Jakhowenkes plegal fees prior \$5 contempt heavisy be taken out of the rettermate In the amount of \$4,682.47 Thank you all Allen Herring III HH.

EXHIBIT "B"

A. VICTOR MEITNER, JR., P.C.

By: A. Victor Meitner, Jr., Esq.

ID: 09223

By: Patrick J. McMonagle, Esq.

ID: 83890

564 Skippack Pike Blue Bell, PA 19422 Attorneys for Respondent

Arthur Herring, III

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

NOTICE OF APPEAL

Notice is hereby given that Arthur Herring III, Petitioner/Respondent in the above-captioned matter, hereby appeals to the Superior Court of Pennsylvania from the Order entered in this matter on the 7th day of October 2022. This Order has been entered in the docket as evidenced by the attached copy of the docket entry.

Respectfully Submitted,

A. VICTOR MEITNER, JR.

A. Victor Meitner, Jr., P.C.

Attorney ID No. 09223

Attorney for Petitioner

Arthur Herring, III

	Montgo:	mery County Orphans' Cou	rt Division	
	OVE	R SHEET		
A. Does this matter already have an Orphans' Court		1B. Orphans' Court Number/R	egister of Wills Number	
number or Register of Wills number? Yes		2021-X2110		
2. Name of Estate/Entity (e.g.: Name of Deced	ent or De	cedent's Estate)		
JANE T HERRING				
3. Type of Estate/Entity				
<u>ALLEGED INCAPACITATED PERSON (GU</u>		NSHIP)		
4. Name of Filing Party (not Attorney for Filing	Party)			
ARTHUR HERRING III			nan varioren era	
5. Filing Party's Relationship to Estate/Entity				
SON				
6A. Name of Self-Represented Party		68. Address of Attorney (or Filing Party, if not represented)		
or Attorney for Filing Party. Patrick McMonagle		564 SKIPPACK PIKE		
ratick Micivioliagie	BLOF	BELL, PA 19422		
7A. Phone Number	78. Far	7B. Fax Number		
(215) 540-0575·	(215)	(215) 542-0259		
8A. Supreme Court ID Number of Attorney	8B. E-N	8B. E-Mail Address		
83890	PMcN	PMcMonagle@meitnerlaw.com		
9. To the Clerk of the Orphans' Court:				
Kindly enter my appearance on behalf			r	
10. Signature of Attorney (or if unrepresented,			10A. Date	
By eFiling a legal paper, I will be considered to have signed this cover 11/8/2022				
ahaabaaai ili laga ga abbasaas ta karra		* * *		
•	s legal n	aner.		
party on whose behalf I am efiling this				
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party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s):			er of the filing to which	
party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6)			er of the filing to which	
party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6) 12. Other Parties:	e provide	the title, date and docket number		
party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6) 12. Other Parties:	e provide HE NAME	the title, date and docket numbers, ADDRESS AND TELEPHONE NU	MBER FOR EACH	
party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6) 12. Other Parties: PLEASE ATTACH A SEPARATE SHEET LISTING TO UNREPRESENTED PARTY, AND THE NAME OF EAND TELEPHONE NUMBER OF THAT PARTY'S A	e provide HE NAME EACH REP ATTORNE	the title, date and docket number, ADDRESS AND TELEPHONE NURSENTED PARTY, TOGETHER WAY OF RECORD.	MBER FOR EACH IITH THE NAME, ADDRES	
11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6) 12. Other Parties: PLEASE ATTACH A SEPARATE SHEET LISTING TI	e provide HE NAME EACH REP ATTORNE	the title, date and docket number, ADDRESS AND TELEPHONE NURSENTED PARTY, TOGETHER WAY OF RECORD.	MBER FOR EACH IITH THE NAME, ADDRES	
party on whose behalf I am eFiling this 11. If this filing responds to a prior filing, please this responds: Prior Filing(s): Order / Decree; 10/7/2022 (29.6) 12. Other Parties: PLEASE ATTACH A SEPARATE SHEET LISTING THE UNREPRESENTED PARTY, AND THE NAME OF EAND TELEPHONE NUMBER OF THAT PARTY'S A 13. Pleading or Document filed (Please select files)	e provide HE NAME EACH REP ATTORNE From list o	the title, date and docket number, ADDRESS AND TELEPHONE NURSENTED PARTY, TOGETHER WY OF RECORD. f pleadings at http://rwoc.monto	MBER FOR EACH IITH THE NAME, ADDRES	

Notice

EXHIBIT "C"

Filed 05/08/2023

IN RE: J.T.H., AN INCAPACITATED

PERSON

IN THE SUPERIOR COURT OF

PENNSYLVANIA

Montgomery County Orphans' APPEAL OF: A.H.

Court

2021-X2110

No. 3172 EDA 2022

ORDER

Upon consideration of the April 29, 2023, Application for Reconsideration of Order filed by Appellant, the application is **DENIED**.

PER CURIAM

Notice

Court of Common Pleas of			urt Division	
· · · · · · · · · · · · · · · · · · ·		R SHEET		
1A. Does this matter already have an Orphans' Conumber or Register of Wills number? Yes		1B. Orphans' Court Number/F	Register of Wills Number	
		2021-X2110		
2. Name of Estate/Entity (e.g.: Name of Deced	dent or De	cedent's Estate)		
JANE T HERRING				
3. Type of Estate/Entity				
ALLEGED INCAPACITATED PERSON (G	UARDIA	NSHIP)		
4. Name of Filing Party (not Attorney for Filing	g Party)			
JANE T HERRING				
5. Filing Party's Relationship to Estate/Entity				
6A. Name of Self-Represented Party	1	6B. Address of Attorney (or Filing Party, if not represented)		
or Attorney for Filing Party.		815 GREENWOOD AVENUE		
DAVID JASKOWIAK	SUITE 14			
	JENKINTOWN, PA 19046			
7A. Phone Number	7D C	. M. soude - co		
(215) 886-7720	7B. Fax Number			
	(215) 886-7728			
8A. Supreme Court ID Number of Attorney	8B. E-Mail Address			
49753	david	davidjas@davidjaslaw.com		
9. To the Clerk of the Orphans' Court:				
Kindly enter my appearance on behalt	f of the f	iling party identified above		
10. Signature of Attorney (or if unrepresented				
By eFiling a legal paper, I will be consi			6/29/2023	
sheet and, if I am an attorney, to have		* * *		
party on whose behalf I am eFiling thi 11. If this filing responds to a prior filing, pleas			or of the files to which	
this responds: Prior Filing(s) :	se brovide	the little, trate and docket numb	er or trie ming to which	
Order / Decree; 10/7/2022 (29.6)				
Motion; 6/28/2023 (29.6.2)				
12. Other Parties:		·		
PLEASE ATTACH A SEPARATE SHEET LISTING T	HE NAME	, ADDRESS AND TELEPHONE NU	IMBER FOR EACH	
UNREPRESENTED PARTY, AND THE NAME OF	EACH REP	RESENTED PARTY, TOGETHER W		
AND TELEPHONE NUMBER OF THAT PARTY'S				
13. Pleading or Document filed (Please select t		f pleadings at http://rwoc.monte	copa.org/forms or	
available from the Clerk of the Orphans' Court)) ;			
Praecipe				
.4. PLEASE SELECT ONE (AND ONLY ONE) OF T	HE SPECIF	IED TYPES OF FILINGS:		

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

NOTICE TO PLEAD

You are hereby notified to file a written response to the enclosed Motion for Order Directing Sheriff Regarding Eviction Procedures within twenty (20) days from service hereof or the Court may deem that you have no objection to the relief requested and may grant the relief requested without further notice to you.

DAVID A. JASKOWIAK, ESQUIRE

Attorney ID: 49753

815 Greenwood Avenue, Suite 14

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728 davidjas@davidjaslaw.com

Court-Appointed Counsel for Jane T. Herring, an

Incapacitated Person

DATED: June 29, 2023

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

NO. 2021-X2110

IN RE: JANE T. HERRING AN INCAPACITATED PERSON

CERTIFICATION OF SERVICE

I, David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, hereby certify that service of a true and correct copy of the Praecipe to Attach the Notice to Plead in the above-captioned matter was served upon the following individuals in the following manner on June 29, 2023:

Electronic filing USPS first class mail Thad M. Gelsinger, Esquire Barley Snyder 2755 Century Boulevard Wyomissing, PA 19610 Counsel for Pamela Blumer, Guardian of the Person

Electronic filing
USPS first class mail
Brittany J. Camp, Esquire
Heckscher, Teillon, Terrill & Sager, P.C.
1001 Conshohocken State Road
Suite 1-300
West Conshohocken, PA 19428
Counsel for Jill Herring, Daughter of
Jane T. Herring

Electronic filing
USPS first class mail
Ronald Fenstermacher, Esquire
1001 Conshohocken State Road
Suite 1-311
West Conshohocken, PA 19428
Guardian of the Estate of Jane T. Herring

USPS Certified mail USPS first class mail Arthur Herring, III 26 Chancery Court Souderton, PA Pro se

DAVID A. JASKOWIAK, ESQUIRE

Identification No.: 49753

Suite 14

815 Greenwood Avenue Jonkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

davidjas@davidjaslaw.com

Court-Appointed Counsel for Jane T. Herring, an

Incapacitated Person

DATED: June 29, 2023