

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 JILL SCOTT HERRING  
TO THE JUNE 27, 2023 COURT ORDER AND  
JUNE 21, 2023 REPORT OF DR. LEDAKIS**

**TO THE HONORABLE, THE JUDGES OF SAID DIVISION:**

In accordance with this Court's Order dated June 27, 2023 and upon review of the June 21, 2023 Report prepared by Dr. George Ledakis (the "2023 Report"), Brittany J. Camp, Esquire, counsel for Jill Scott Herring ("Jill"), daughter of Jane T. Herring ("Jane"), an Incapacitated Person, respectfully provides an opinion, on behalf of Jill, with respect to future visits between Jane and her son, Arthur Herring, III ("Arthur").

Jill strongly believes that it is in Jane's best interests that any and all future visits between Arthur and Jane, to the extent permitted by this Court, continue to be supervised and monitored and that during any such visits, Arthur continue to be prohibited from discussing topics with Jane, whether orally or in writing, which are or may be harmful or detrimental to Jane emotionally or cognitively, as determined by the Court, Jane's court-appointed counsel, the Guardian of Jane's Person, and/or Dr. Ledakis. Notwithstanding the foregoing, in light of Arthur's prior violation of various Orders issued by this Court, Jill believes that Arthur should be prohibited from visiting with Jane in the event Arthur's actions cause him to be in further violation of any existing or future Orders issued by this Court.


Additionally, Jill believes that Arthur should be personally responsible for any and all costs incurred in connection with his visits with Jane, including but not limited to the cost of

supervision and related reporting to this Court, as well as any fees incurred by the parties or their  
counsel due to Arthur's violation of any Orders of this Court related to the parameters of his  
visits with Jane, and that such additional expenses should not be borne by Jane's estate, unless  
they are to be allocated to and deducted from Arthur's share of Jane's estate upon her death.

➤ In conclusion, Jill has no objection to the Court issuing an Order, consistent with prior  
Orders of this Court and Dr. Ledakis' recommendation in the 2023 Report, requiring that  
Arthur's visits with Jane continue to be supervised and that the other measures imposed by the  
Court in an effort to best shield Jane from undue harm related to Arthur's visits remain in place.

Respectfully submitted,

Dated: July 11, 2023

  
Brittany J. Camp (J.D. No. 314160)  
Heckscher, Teillon, Terrill & Sager, P.C.  
1001 Conshohocken State Road, Suite 1-300  
West Conshohocken, PA 19428  
(610) 940-4197 - bcamp@htts.com

*Counsel for Jill Scott Herring,  
Daughter of Jane T. Herring*

02353336.DOCX