
Bruce L. Castor, Jr., Esquire	:	PHILADELPHIA COUNTY
	:	Court of Common Pleas
Plaintiff,	:	
	:	October Term, 2017
v.	:	
	:	No.: 00755
Andrea Constand, et al.	:	
	:	JURY TRIAL DEMANDED
Defendants.	:	

ORDER

AND NOW, this day of , 2017, upon consideration of Plaintiff's Response to Defendants Bebe H. Kivitz, Esquire, Jacobs Kivitz & Drake, LLC, Dolores M. Troiani, Esquire and Troiani & Gibney, LLP's Preliminary Objections, and the filling of an Amended Complaint, it is hereby **ORDERED** and **DECREED** that the Defendants' Preliminary Objections, Control No. 17113047, are hereby **OVERRULED** as **MOOT**.

BY THE COURT:

J.

THE BEASLEY FIRM, LLC
BY: James E. Beasley, Jr., Esq.
Heidi G. Villari, Esq.
Lane R. Jubb, Jr., Esq.

Attorney for Plaintiffs

Identification Nos. 83282/82771/319272
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Bruce L. Castor, Jr., Esquire	:	PHILADELPHIA COUNTY
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PLAINTIFF'S RESPONSE TO PRELIMINARY OBJECTIONS OF DEFENDANTS, BEBE H. KIVITZ, ESQUIRE, JACOBS KIVITZ & DRAKE, LLC, DOLORES M. TROIANI, ESQUIRE AND TROIANI & GIBNEY, LLP

Plaintiff, through counsel, hereby responds to Defendants' Preliminary Objections to Plaintiff's Complaint:

Defendants' Preliminary Objections are moot based upon Plaintiff's filing of an Amended Complaint, attached hereto as Exhibit "A."

THE BEASLEY FIRM, LLC

BY: /s/James E. Beasley, Jr.
JAMES E. BEASLEY, JR.
THE BEASLEY BUILDING
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215.592.1000
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Attorneys for Plaintiff

Dated: 18 December 2017

THE BEASLEY FIRM, LLC
BY: James E. Beasley, Jr., Esq.
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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S RESPONSE TO
PRELIMINARY OBJECTIONS OF DEFENDANTS, BEBE H. KIVITZ,
ESQUIRE, JACOBS KIVITZ & DRAKE, LLC, DOLORES M.
TROIANI, ESQUIRE AND TROIANI & GIBNEY, LLP**

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THE BEASLEY FIRM, LLC

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Attorneys for Plaintiffs

Dated: 18 December 2017

CERTIFICATE OF SERVICE

I, James E. Beasley, Jr., hereby certify that service of a true and correct copy of the foregoing was served upon counsel listed below via the Court's ECF system.

Jeffrey B. McCarron, Esq.
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Attorneys for Bebe H. Kivitz, Esq., Jacobs Kivitz & Drake, LLC
Dolores M. Troiani, Esq. and Troiani & Gibney, LLP

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Attorneys for Andrea Constand

/s/James E. Beasley, Jr.
JAMES E. BEASLEY, JR.

Dated: 18 December 2017