

Court of Common Pleas of Philadelphia County  
Trial Division

**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)	
<b>MAY 2016</b>	<b>002138</b>
E-Filing Number: 1605041713	

PLAINTIFF'S NAME <b>ANDREW HAUGHT</b>	DEFENDANT'S NAME <b>KEVIN HARRIGAN</b>
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PLAINTIFF'S ADDRESS <b>C/O KLINE &amp; SPECTER, P.C. 1525 LOCUST STREET PHILADELPHIA PHILADELPHIA PA 19102</b>	DEFENDANT'S ADDRESS <b>1058 GOTLAND CIRCLE WARRINGTON PA 18976</b>
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PLAINTIFF'S NAME <b>ZACHARY HESSE</b>	DEFENDANT'S NAME <b>KATHRYN KNOTT</b>
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PLAINTIFF'S ADDRESS <b>C/O KLINE &amp; SPECTER, P.C. 1525 LOCUST STREET PHILADELPHIA PA 19102</b>	DEFENDANT'S ADDRESS <b>INMATE # 1156191 RIVERSIDE CORRECTIONAL FACILIT 8151 STATE ROAD, PO BOX 6230 PHILADELPHIA PA 19136</b>
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PLAINTIFF'S NAME	DEFENDANT'S NAME <b>PHILIP WILLIAMS</b>
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PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS <b>157 ACORN DRIVE WARMINSTER PA 18974</b>
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TOTAL NUMBER OF PLAINTIFFS <b>2</b>	TOTAL NUMBER OF DEFENDANTS <b>3</b>	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions
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AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____
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CASE TYPE AND CODE <b>2B - ASSAULT, BATTERY</b>
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STATUTORY BASIS FOR CAUSE OF ACTION
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RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	<p style="text-align: center;"><b>FILED PRO PROTHY MAY 17 2016 C. FORTE</b></p>	IS CASE SUBJECT TO COORDINATION ORDER? YES    NO
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**TO THE PROTHONOTARY:**  
Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: ANDREW HAUGHT , ZACHARY HESSE  
Papers may be served at the address set forth below.

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY <b>ANDREW S. YOUMAN</b>	ADDRESS <b>1525 LOCUST STREET PHILADELPHIA PA 19102</b>
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PHONE NUMBER <b>(215) 772-1000</b>	FAX NUMBER <b>(215) 735-0937</b>
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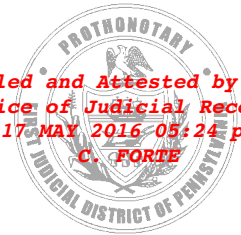
SUPREME COURT IDENTIFICATION NO. <b>65924</b>	E-MAIL ADDRESS <b>andy.youman@klinespecter.com</b>
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SIGNATURE OF FILING ATTORNEY OR PARTY <b>ANDREW YOUMAN</b>	DATE SUBMITTED <b>Tuesday, May 17, 2016, 05:24 pm</b>
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**KLINE & SPECTER, P.C.**

By: THOMAS R. KLINE, ESQUIRE  
ANDREW S. YOUMAN, ESQUIRE  
TRACIE L. PALMER, ESQUIRE

Attorney I.D. Nos.: 28895/65924/312098  
1525 Locust Street  
Philadelphia, PA 19102  
(215) 772-1000 (phone)  
(215) 735-0937 (fax)



*Attorneys for Plaintiffs*

**ZACHARY HESSE**  
c/o Kline & Specter, P.C.  
1525 Locust Street  
Philadelphia, PA 19102

and

**ANDREW HAUGHT**  
c/o Kline & Specter, P.C.  
1525 Locust Street  
Philadelphia, PA 19102

Plaintiffs

v.

**KEVIN HARRIGAN**  
1058 Gotland Circle  
Warrington, PA 18976

and

**KATHRYN KNOTT**  
Inmate #1156191  
Riverside Correctional Facility  
8151 State Road  
P.O. Box 6230  
Philadelphia, PA 19136

and

**PHILIP WILLIAMS**  
157 Acorn Drive  
Warminster, PA 18974

Defendants.

**COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY**

**NO.**

**MAY TERM, 2016**

**JURY TRIAL DEMANDED**

**CIVIL ACTION  
ASSAULT AND BATTERY**

## **NOTICE TO PLEAD**

### **NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.**

Lawyer Referral Service  
Philadelphia Bar Association  
1101 Market Street, 11<sup>th</sup> Floor  
Philadelphia, PA 19107  
(215) 238-6338

### **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación.

Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte pueda decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

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Philadelphia, PA 19107  
(215) 238-6338

## **CIVIL ACTION COMPLAINT**

Plaintiffs, Zachary Hesse and Andrew Haught, by and through their undersigned counsel, Kline & Specter, P.C., bring this civil action against the above-captioned Defendants based upon the predicate facts and causes of action set forth below. Plaintiffs aver as follows:

### **VENUE AND PARTIES**

1. Plaintiff Zachary Hesse is an adult citizen and resident of the Commonwealth of Pennsylvania.
2. Plaintiff Andrew Haught is an adult citizen and resident of the Commonwealth of Pennsylvania.
3. Defendant Kevin Harrigan is an adult person and resident of the Commonwealth of Pennsylvania, residing at 1058 Gotland Circle, Warrington, Pennsylvania 18976.
4. Defendant Kathryn Knott is an adult person and resident of the Commonwealth of Pennsylvania, presently residing at Riverside Correctional Facility, 8151 State Road, P.O. Box

6230, Philadelphia, Pennsylvania 19136.

5. Defendant Philip Williams is an adult person and resident of the Commonwealth of Pennsylvania, residing at 157 Acorn Drive, Warminster, Pennsylvania 18974.

6. Venue is properly laid in Philadelphia County because the conduct which is the subject of the claims herein took place in Philadelphia County.

### OPERATIVE FACTS

7. On September 11, 2014, at or around 2245 hours, Plaintiffs were walking eastbound on Chancellor Street in the direction of 16<sup>th</sup> Street in Center City, Philadelphia.

8. On September 11, 2014, at or around 2245 hours, Defendants were walking northbound on 16<sup>th</sup> Street toward Walnut Street with a group of approximately 12 to 15 people.

9. At or near the intersection of 16<sup>th</sup> Street and Chancellor Street, Defendant Kevin Harrigan observed Plaintiffs walking eastbound on Chancellor Street. At that time, Defendant Harrigan began shouting derogatory slurs at Plaintiffs, referring to Plaintiff Zachary Hesse as a “dirty fucking faggot.”

10. Without provocation, justification or any cause whatsoever, Defendant Harrigan approached Mr. Hesse and shoved him before Defendant Harrigan struck Mr. Hesse in the face with a closed fist. After Mr. Hesse had been struck by Defendant Harrigan, members of Defendants’ group surrounded Mr. Hesse and restrained his arms while he was repeatedly struck in the face and body.

11. Without provocation, justification or any cause whatsoever, Defendant Kathryn Knott struck Mr. Hesse in the face while he was restrained and called him a “faggot.”

12. Without provocation, justification or any cause whatsoever, a member of Defendants’ group bear-hugged Plaintiff Andrew Haught, knocking his glasses to the ground and

rendering him unable to see or defend himself.

13. Without provocation, justification or any cause whatsoever, Defendant Philip Williams attacked a defenseless Mr. Haught, striking him in the face multiple times with a closed fist. As a result, Mr. Haught was knocked to the ground and temporarily lost consciousness.

14. While Mr. Haught remained motionless and bleeding on the ground, the Defendants and their group of friends exited the area. None of the Defendants attempted to render aid to Mr. Haught or call emergency services.

15. Mr. Haught was transported by ambulance to Hahnemann University Hospital ("Hahnemann") where he underwent emergency surgery to treat his injuries. Mr. Haught remained hospitalized at Hahnemann for five (5) days following the assault.

16. On the basis of the conduct set forth herein, Defendant Harrigan pleaded guilty to Simple Assault and Conspiracy to Commit Simple Assault, both misdemeanors of the second degree.

17. On the basis of the conduct set forth herein, Defendant Knott was convicted by a jury of her peers of Simple Assault, Conspiracy to Commit Simple Assault, and two (2) counts of Recklessly Endangering Another Person, all misdemeanors of the second degree.

18. On the basis of the conduct set forth herein, Defendant Williams pleaded guilty to Aggravated Assault and Conspiracy to Commit Aggravated Assault, both felonies of the first degree.

19. As a direct and proximate result of the conduct of all Defendants, Zachary Hesse suffered injuries including, but not limited to, lacerations and bruising to the face and body; psychological injury; emotional distress; past and future pain and suffering; past and future mental anguish; past and future humiliation; and past and future embarrassment.

20. As a direct and proximate result of the conduct of all Defendants, Andrew Haught suffered injuries including, but not limited to, a fractured jaw bone that required his jaw to be wired shut with metal bars secured by 16 screws for a period of eight (8) weeks; jaw wire and screw removal; fractured orbital bone; permanent facial scar; lacerations and bruising to the face and body; psychological injury; emotional distress; past and future pain and suffering; past and future mental anguish; past and future humiliation; past and future embarrassment; past lost wages; and past medical expenses.

**COUNT I – ASSAULT & BATTERY**  
**Plaintiff, Zachary Hesse v. Defendant, Kevin Harrigan**

21. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

22. Kevin Harrigan intentionally attempted or threatened to inflict injury to Mr. Hesse's person, with the apparent ability to cause harm, and which caused Mr. Hesse a reasonable apprehension of bodily harm or offensive contact.

23. Kevin Harrigan caused harmful or offensive contacts with Mr. Hesse's person, resulting from acts intended to cause Mr. Hesse to experience such contacts or apprehension that such contacts were imminent.

24. The conduct of Kevin Harrigan constituting assault and battery consisted, among other things, of the following:

- a. Striking Mr. Hesse;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that he had cause for striking Mr. Hesse;
- d. Striking Mr. Hesse while he was restrained and unable to defend himself;
- e. Continuing to strike Mr. Hesse after having already harmed him;

- f. Causing harm to Mr. Hesse; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT II – ASSAULT**  
**Plaintiff, Andrew Haught v. Defendant, Kevin Harrigan**

25. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

26. Kevin Harrigan intentionally attempted or threatened to inflict injury to Mr. Haught's person, with the apparent ability to cause harm, and which caused Mr. Haught a reasonable apprehension of bodily harm or offensive contact.

27. The conduct of Kevin Harrigan constituting an assault consisted, among other things, of the following:

- a. Striking Mr. Hesse;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that he had cause for striking Mr. Hesse;
- d. Striking Mr. Hesse while he was restrained and unable to defend himself;
- e. Continuing to strike Mr. Hesse after having already harmed him;
- f. Causing harm to Mr. Hesse; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT III – ASSAULT & BATTERY**  
**Plaintiff, Zachary Hesse v. Defendant, Kathryn Knott**

28. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

29. Kathryn Knott intentionally attempted or threatened to inflict injury to Mr. Hesse's person, with the apparent ability to cause harm, and which caused Mr. Hesse a reasonable apprehension of bodily harm or offensive contact.

30. Kathryn Knott caused harmful or offensive contacts with Mr. Hesse's person, resulting from acts intended to cause Mr. Hesse to experience such contacts or apprehension that such contacts were imminent.

31. The conduct of Kathryn Knott constituting assault and battery consisted, among other things, of the following:

- a. Striking Mr. Hesse;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that she had cause for striking Mr. Hesse;
- d. Striking Mr. Hesse while he was restrained and unable to defend himself;
- e. Continuing to strike Mr. Hesse after having already harmed him;
- f. Causing harm to Mr. Hesse; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.



**COUNT IV – ASSAULT**  
**Plaintiff, Andrew Haught v. Defendant, Kathryn Knott**

32. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

33. Kathryn Knott intentionally attempted or threatened to inflict injury to Mr. Haught's person, with the apparent ability to cause harm, and which caused Mr. Haught a reasonable apprehension of bodily harm or offensive contact.

34. The conduct of Kathryn Knott constituting an assault consisted, among other things, of the following:

- a. Striking Mr. Hesse;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that she had cause for striking Mr. Hesse;
- d. Striking Mr. Hesse while he was restrained and unable to defend himself;
- e. Continuing to strike Mr. Hesse after having already harmed him;
- f. Causing harm to Mr. Hesse; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT V – ASSAULT**  
**Plaintiff, Zachary Hesse v. Defendant, Philip Williams**

35. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

36. Philip Williams intentionally attempted or threatened to inflict injury to Mr.

Hesse's person, with the apparent ability to cause harm, and which caused Mr. Hesse a reasonable apprehension of bodily harm or offensive contact.

37. The conduct of Phillip Williams constituting an assault consisted, among other things, of the following:

- a. Striking Mr. Haught;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that he had cause for striking Mr. Haught;
- d. Striking Mr. Haught after his eye glasses had been removed and he was unable to defend himself;
- e. Continuing to strike Mr. Haught after having already harmed him;
- f. Causing harm to Mr. Haught; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT VI – ASSAULT & BATTERY**  
**Plaintiff, Andrew Haught v. Defendant, Philip Williams**

38. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

39. Philip Williams intentionally attempted or threatened to inflict injury to Mr. Haught's person, with the apparent ability to cause harm, and which caused Mr. Haught a reasonable apprehension of bodily harm or offensive contact.

40. Philip Williams caused harmful or offensive contacts with Mr. Haught's person, resulting from acts intended to cause Mr. Haught to experience such contacts or apprehension

that such contacts were imminent.

41. The conduct of Phillip Williams constituting assault and battery consisted, among other things, of the following:

- a. Striking Mr. Haught;
- b. Using derogatory speech to refer to Mr. Hesse and Mr. Haught;
- c. Believing mistakenly that he had cause for striking Mr. Haught;
- d. Striking Mr. Haught after his eye glasses had been removed and he was unable to defend himself;
- e. Continuing to strike Mr. Haught after having already harmed him;
- f. Causing harm to Mr. Haught; and
- g. Acting without cause or justification.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT VII – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS  
Plaintiff, Zachary Hesse v. All Defendants**

42. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

43. Plaintiff Zachary Hesse witnessed the conduct of all Defendants, as detailed above, and the consequences of that conduct as set forth in Paragraphs 9 through 20.

44. The conduct of all Defendants, as detailed above, caused Plaintiff Zachary Hesse to fear for his own personal safety and well-being. The Defendants' conduct put Plaintiff Zachary Hesse within the zone of danger, which placed him in jeopardy and caused Mr. Hesse to suffer severe emotional distress, anxiety and physical and psychological injury.

45. The conduct of all Defendants, as detailed above, caused Plaintiff Zachary Hesse to contemporaneously witness severe physical injury inflicted upon his partner, Plaintiff Andrew Haught, which caused Mr. Hesse to suffer severe emotional distress, anxiety and physical and psychological injury.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT VIII – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**Plaintiff, Andrew Haught v. All Defendants**

46. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

47. Plaintiff Andrew Haught witnessed the conduct of all Defendants, as detailed above, and the consequences of that conduct as set forth in Paragraphs 9 through 20.

48. The conduct of all Defendants, as detailed above, caused Plaintiff Andrew Haught to fear for his own personal safety and well-being. The Defendants' conduct put Plaintiff Andrew Haught within the zone of danger, which placed him in jeopardy and caused Mr. Haught to suffer severe emotional distress, anxiety and physical and psychological injury.

49. The conduct of all Defendants, as detailed above, caused Plaintiff Andrew Haught to contemporaneously witness physical injury inflicted upon his partner, Plaintiff Zachary Hesse, which caused Mr. Haught to suffer severe emotional distress, anxiety and physical and psychological injury.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT IX – RESTATEMENT (SECOND) OF TORTS § 322**  
**Plaintiff, Zachary Hesse v. All Defendants**

50. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

51. Defendants knew or had reason to know that their conduct caused bodily harm to Plaintiff Zachary Hesse so as to render him helpless and in danger of further harm, including by reason of delayed assistance or medical treatment.

52. Defendants nonetheless breached their duty to exercise reasonable care to prevent such further harm, thereby increasing the risk of harm to Mr. Hesse, and protracting and worsening the harm caused by the Defendants' conduct.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**COUNT X – RESTATEMENT (SECOND) OF TORTS § 322**  
**Plaintiff, Andrew Haught v. All Defendants**

53. Plaintiffs incorporate by reference the preceding paragraphs and allegations as though fully set forth herein.

54. Defendants knew or had reason to know that their conduct caused bodily harm to Plaintiff Andrew Haught so as to render him helpless and in danger of further harm, including by reason of delayed assistance or medical treatment.

55. Defendants nonetheless breached their duty to exercise reasonable care to prevent such further harm, thereby increasing the risk of harm to Mr. Haught, and protracting and worsening the harm caused by the Defendants' conduct.

**WHEREFORE**, Plaintiffs demand judgment against all Defendants in an amount in excess of Fifty Thousand Dollars (\$50,000.00), and in excess of the prevailing arbitration limits, exclusive of prejudgment interest, post-judgment interest and costs.

**KLINE & SPECTER, P.C.**

BY:           A. S. Youman            
THOMAS R. KLINE, ESQUIRE  
ANDREW S. YOUMAN, ESQUIRE  
TRACIE L. PALMER, ESQUIRE  
*Attorneys for Plaintiffs*

Dated:   5  |  17  |  16

**VERIFICATION**

I, Zachary Hesse, hereby verify that I am the Plaintiff in the foregoing action; that the attached Civil Action Complaint is based upon information which I have furnished to my counsel and information which has been gathered by my counsel in the preparation of the lawsuit. The language of the Civil Action Complaint is that of counsel and is not mine. I have read the Civil Action Complaint and to the extent that the allegations therein are based upon information I have given counsel, they are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Civil Action Complaint are that of counsel, I have relied upon counsel in making this Verification. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsifications to authorities.



\_\_\_\_\_  
ZACHARY HESSE

Date: 05-13-16

**VERIFICATION**

I, Andrew Haught, hereby verify that I am the Plaintiff in the foregoing action; that the attached Civil Action Complaint is based upon information which I have furnished to my counsel and information which has been gathered by my counsel in the preparation of the lawsuit. The language of the Civil Action Complaint is that of counsel and is not mine. I have read the Civil Action Complaint and to the extent that the allegations therein are based upon information I have given counsel, they are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Civil Action Complaint are that of counsel, I have relied upon counsel in making this Verification. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsifications to authorities.

  
\_\_\_\_\_  
ANDREW HAUGHT

Date: 05/13/16