

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

York

County

For Prothonotary Use Only

Friday, June 14, 2013 10:24 AM

2013-SU-002078-82

OFFICE OF PROTHONOTARY
2013 JUN 14 10:24 AM
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YORK, PA

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

| | |
|--|---|
| Commencement of Action: | |
| <input type="checkbox"/> Complaint | <input checked="" type="checkbox"/> Writ of Summons |
| <input type="checkbox"/> Transfer from Another Jurisdiction | <input type="checkbox"/> Petition |
| | <input type="checkbox"/> Declaration of Taking |
| Lead Plaintiff's Name: Nicole Brown | Lead Defendant's Name: Planned Parenthood Southeastern Pennsylvania |
| Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Dollar Amount Requested: <input type="checkbox"/> within arbitration limits (check one) <input checked="" type="checkbox"/> outside arbitration limits |
| Is this a Class Action Suit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Is this an MDJ Appeal? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Name of Plaintiff/Appellant's Attorney: Robin J. Marzella, Esq. | |
| <input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant) | |

SECTION B

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

| | | |
|--|--|---|
| <p>TORT (do not include Mass Tort)</p> <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Label/ Defamation <input type="checkbox"/> Other: | <p>CONTRACT (do not include Judgments)</p> <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other <input type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other <input type="checkbox"/> Other: | <p>CIVIL APPEALS</p> <input type="checkbox"/> Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: |
| <p>MASS TORT</p> <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: | <p>REAL PROPERTY</p> <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: | <p>MISCELLANEOUS</p> <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: |
| <p>PROFESSIONAL LIABILITY</p> <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input checked="" type="checkbox"/> Medical Malpractice <input type="checkbox"/> Other Professional: | | |

R. J. MARZELLA & ASSOCIATES, P.C.

BY: ROBIN J. MARZELLA, ESQUIRE

PA SUPREME COURT I.D. NO. 66856

3513 NORTH FRONT STREET

HARRISBURG, PA 17110-1438

TELEPHONE: (717) 234-7828

FACSIMILE: (717) 234-6883

EMAIL: RMARZELLA@RJMARZELLA.COM

ATTORNEYS FOR PLAINTIFF

NICOLE BROWN

IN THE COURT OF COMMON PLEAS
YORK COUNTY, PENNSYLVANIA

NICOLE BROWN :
1501 OLD BLACKHORSE PIKE :
APT. F11 :
BLACKWOOD, NJ 08012 :
PLAINTIFF :

VS. :

PLANNED PARENTHOOD SOUTHEASTERN :
PENNSYLVANIA :
1144 LOCUST STREET :
PHILADELPHIA, PA 19107 :

PLANNED PARENTHOOD SOUTHEASTERN :
PENNSYLVANIA - WEST CHESTER HEALTH CENTER :
8 SOUTH WAYNE STREET :
WEST CHESTER, PA 19382 :

MAIN LINE FERTILITY :
915 OLD FERN HILL ROAD :
BUILDING B :
WEST CHESTER, PA 19380 :

MAIN LINE FERTILITY AND REPRODUCTIVE :
MEDICINE, LIMITED :
130 S BRYN MAWR AVENUE :
GROUND FLOOR, D WING :
BRYN MAWR, PA 19010 :

JOEL P. LEBED, MD, DO :
1144 LOCUST STREET :
PHILADELPHIA, PA 19107 :

DOCKET NUMBER:

Friday, June 14, 2013 10:24 AM

2013-SU-002078-82

PROFESSIONAL MEDICAL NEGLIGENCE

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2013-SU-002078-82

THE WOMEN'S HEALTHCARE GROUP :
1693 SOUTH QUEEN STREET :
YORK, PA 17403 :

SUSQUEHANNA VALLEY WOMEN'S HEALTHCARE, P.C. :
694 GOOD DRIVE :
LANCASTER, PA 17601 :

KATHRYN HASSINGER, MD :
1693 SOUTH QUEEN STREET :
YORK, PA 17403 :

YORK HOSPITAL :
1001 S. GEORGE STREET :
YORK, PA 17405 :

CAROLYN E. GROTKOWSKI, M.D. :
907 PLEASANT VALLEY AVENUE, SUITE 1 :
MT. LAUREL, NJ 08054 :

QUEST DIAGNOSTICS, INCORPORATED :
907 PLEASANT VALLEY AVENUE, SUITE 1 :
MT. LAUREL, NJ 08054 :

QUEST DIAGNOSTICS, INCORPORATED :
2711 CENTERVILLE ROAD, SUITE 400 :
WILMINGTON, DE 19808 :

QUEST DIAGNOSTICS OF PENNSYLVANIA, INC. :
2711 CENTERVILLE ROAD, SUITE 400 :
WILMINGTON, DE 19808 :

QUEST DIAGNOSTICS OF PENNSYLVANIA, INC. :
875 GREENTREE ROAD :
FOUR PARKWAY CENTER :
PITTSBURGH, PA 15220 :

QUEST DIAGNOSTICS, INCORPORATED :
CORPORATE TRUST CENTER :
1209 ORANGE STREET :
WILMINGTON, DE 19801 :

QUEST DIAGNOSTICS CLINICAL LABORATORIES, INC.:

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JURY TRIAL DEMANDED

2711 CENTERVILLE ROAD, SUITE 400 :
 WILMINGTON, DE 19808 :
 :
 VIRGINIA Q. GALANG, MD :
 13900 LAUREL LAKES AVENUE, SUITE 100 :
 LAUREL, MD 20707-5092 :
 :
 ELLEN D. MANLUCU, MD :
 13900 LAUREL LAKES AVENUE :
 LAUREL, MD 20707-5092 :
 :
 CYTOLOGY AND HISTOLOGY SERVICES :
 13900 LAUREL LAKES AVENUE :
 LAUREL, MD 20707-5092 :
 Defendants :

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PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY OF SAID COURT:

Please issue Writ of Summons in the above-captioned action.

The addresses of all Parties:

Plaintiff: Nicole Brown
 1501 Old Blackhorse Pike, Apt. F11
 Blackwood, NJ 08012

Defendants: Planned Parenthood Southeastern Pennsylvania
 1144 Locust Street
 Philadelphia, PA 19107

Planned Parenthood Southeastern Pennsylvania - West Chester Health
 Center
 8 South Wayne Street
 West Chester, PA 19382

Joel P. Lebed, MD, DO
 1144 Locust Street
 Philadelphia, PA 19107

AND

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2013-SU-002078-82

Main Line Fertility
915 Old Fern Hill Road
Building B
West Chester, PA 19380

Main Line Fertility and Reproductive Medicine, Limited
130 S Bryn Mawr Avenue
Ground Floor, D Wing
Bryn Mawr, PA 19010

AND

Susquehanna Valley Women's Healthcare, P.C.
694 Good Drive
Lancaster, PA 17601

Kathryn Hassinger, MD
1693 South Queen Street
York, PA 17403

The Women's Healthcare Group
1693 South Queen Street
York, PA 17403

AND

York Hospital
1001 S. George Street
York, PA 17405

AND

Quest Diagnostics, Incorporated
Quest Diagnostics Clinical Laboratories, Inc. AND
Quest Diagnostics of Pennsylvania, Inc.
2711 Centerville Road, Suite 400
Wilmington, DE 19808

AND

Quest Diagnostics of Pennsylvania, Inc.
875 Greentree Road
Four Parkway Center

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Pittsburgh, PA 15220

AND

Quest Diagnostics, Incorporated
Corporate Trust Center
1209 Orange Street
Wilmington, DE 19801

AND

Quest Diagnostics, Incorporated
907 Pleasant Valley Avenue, Suite 1
Mt. Laurel, NJ 08054

Carolyn E. Grotkowski, M.D.
907 Pleasant Valley Avenue, Suite 1
Mt. Laurel, NJ 08054

AND

Virginia Q. Galang, MD
13900 Laurel Lakes Avenue, Suite 100
Laurel, MD 20707-5092

AND

Ellen D. Manlucu, MD
13900 Laurel Lakes Avenue, Suite 100
Laurel, MD 20707-5092

AND

Cytology and Histology Services
13900 Laurel Lakes Avenue
Laurel, MD 20707-5092

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____ Writ of Summons shall be issued and forwarded to () Attorney (X) Sheriff



Signature of Attorney

Robin J. Marzella, Esquire
3513 North Front Street
Harrisburg, PA 17110
(717) 234-7828
Names/Address/Telephone No.
of Attorney

Supreme Court ID No. 66856

Date: 6/13/13

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