

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY,
PENNSYLVANIA

CONNIE JAVENS and
RENEE JAVENS ZUK
Plaintiffs,

vs.

JOHN DOES (1)-(6)
Defendants.

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CIVIL DIVISION
NO.: 10550-2016

TYPE OF PLEADING:
**AMENDED MOTION FOR LEAVE TO FILE
PLAINTIFFS' AFFIDAVITS**

FILED ON BEHALF OF:
**CONNIE JAVENS and
RENEE JAVENS ZUK**

COUNSEL OF RECORD:
**PETER J. PIETRANDEA, ESQUIRE
PA I.D. NO. 42142**

LAW OFFICE OF:
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CRANBERRY TWP., PA 16066
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NOV -9 PM 1:03
KATHY BELME
PROTHONOTARY
BEAVER COUNTY, PA

SL

CERTIFICATE OF SERVICE


I, Peter J. Pietrandrea, Esquire, hereby certify that the foregoing Amended Motion For Leave To File Plaintiffs' Affidavits has been forwarded via email on November 7, 2016 to the following:

GERALD V. BENYO, ESQUIRE
330 DRAVO AVENUE
BEAVER, PA 15009
gvbLaw2@outlook.com

JAMES TALLMAN, ESQUIRE
425 FIRST AVENUE
PITTSBURGH, PA 15219

BRIAN M. COLLINS, ESQUIRE
TEN PENN CENTER
SUITE 2300
1801 MARKET STREET
PHILADELPHIA, PA 19103
bcollins@offitkuman.com

Dated: November 7, 2016

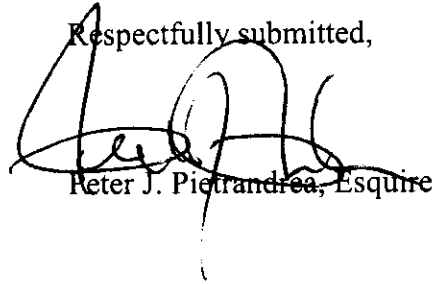


Peter J. Pietrandrea, Esquire
Attorney For Plaintiffs

6. Although Plaintiffs did set forth harm in their original Motion, Plaintiffs seek to supplement Motion by submitting two additional Affidavits. A copy of the Affidavits are attached hereto and incorporated herein as Exhibits "1" and "2".

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant their Amended Motion For Leave To Submit Affidavits.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter J. Pietrandrea". The signature is stylized and somewhat cursive, with a large initial "P" and "J".

Peter J. Pietrandrea, Esquire

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF Beaver) SS:
)

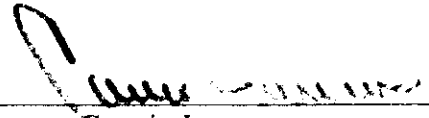
AFFIDAVIT

Before me, the undersigned Notary Public, this, the 7th day of Nov., 2016,
personally appeared Connie Javens, known to me (or satisfactorily proven) who being duly sworn
according to law and intending to be legally bound, deposes and says:

I am the mother of Renee Zuk and have raised four children and currently have 12
grandchildren and 8 great grandchildren. These defamatory comments set forth in our Motion
have caused mental anguish, sleepless nights and humiliation. Friends and family have
repeatedly called me inquiring as to why I am being called names and accused of stealing money
and embezzling from the County and also receiving bribes, which is a total lie. Also, I am
continually being stopped at work, in the stores, banks, etc. and questioned about my conduct as
Treasurer.

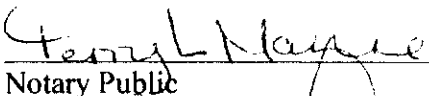
I hereby affirm that the information in this affidavit is true and correct to the best of my
information, knowledge and belief. I understand that false statements herein are made subject to
the penalties of 18 Pa. C.S.A. 4904, relating to unsown falsification to authorities.

Dated: 11-7-16



Connie Javens

Sworn and subscribed before me,
this 7th day of Nov., 2016



Notary Public
My Commission Expires: _____

NOTARIAL SEAL
TERRY L. MAZINE, Notary Public
Beaver Borough, Beaver County, PA
My Commission Expires March 4, 2018



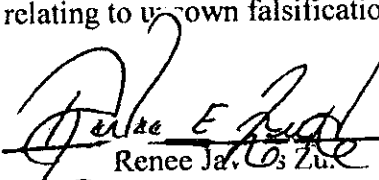
COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF Beaver) SS:

AFFIDAVIT

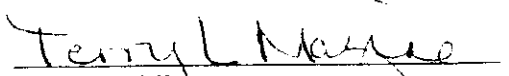
Before me, the undersigned Notary Public, this, the 7th day of Nov, 2016,
personally appeared Renee Javen Zuk, known to me (or satisfactorily proven) who being duly sworn
according to law and intending to be legally bound, deposes and says:

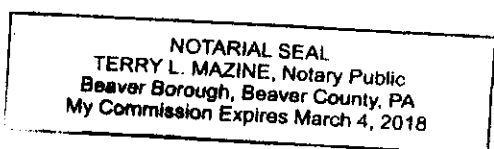
As a result of these comments posted in the Beavercountian, I and my family (which
consists of my three children that I am raising as a single mother) have endured great mental
suffering, many, many sleepless nights, which has resulted in anger. These comments, such as
that I am stealing taxpayers' money and that I possess a STD, have caused great humiliation and
embarrassment. I have received phone calls and numerous individuals have stopped me at
supermarkets, department stores, etc., asking me why I have been targeted. I am currently under
doctor's care and am losing my hair because of all of the stress. My children have (two in
college and one in high school) asked me why are all of these horrible statements about me and
my mother on the website.

I hereby affirm that the information in this affidavit is true and correct to the best of my
information, knowledge and belief. I understand that false statements herein are made subject to
the penalties of 18 Pa. C.S.A. 4904, relating to untruthful falsification to authorities.

Dated: 11-7-16 
Renee Javen Zuk

Sworn and subscribed before me,
this 7th day of Nov, 2016


Terry L. Mazine
Notary Public
My Commission Expires:



**IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY,
PENNSYLVANIA**

CONNIE JAVENS and	:	CIVIL DIVISION
RENEE JAVENS ZUK	:	
Plaintiffs,	:	NO.: 10550-2016
	:	
vs.	:	
	:	
JOHN DOES (1)-(6)	:	
Defendants.	:	

ORDER OF COURT

And now this _____ day of _____, 2016, upon consideration of the foregoing Amended Motion For Leave to File Plaintiffs' Affidavits, the same is granted, and it is ORDERED, ADJUDGED and DECREED that the Plaintiffs' are permitted to file the same.

BY THE COURT

John A. Bozza J.