

Bradford Flynn

From: J. Chadwick Schnee <chadwick@schneelegal.com>
Sent: Friday, November 8, 2024 11:36 AM
To: Michael Long
Subject: Written demand - Borough of Bath v. Long

Good morning, Mr. Long.

As you are aware, the Borough previously requested that you withdraw your two frivolous motions seeking a protective order and the appointment of experts. As you failed to do so within 28 days of the Borough's written demand, the Borough has filed a Motion for Sanctions, a brief in support and a praecipe for argument.

Additionally, the Borough, on October 22, 2024, advised you that your reply briefs in connection with your two frivolous motions should similarly be withdrawn because no local rule of court permits the filing of reply briefs and because you inaccurately quoted both a statute and a court case. You have not done so as of this writing.

I learned today that your motion seeking reconsideration of your two prior motions has been filed. Again, because your motion for reconsideration of your prior frivolous motions completely lacks any legal or factual support, please accept this correspondence as a written demand to withdraw your motion for reconsideration no later than December 6, 2024. A failure to do so may result in the Borough filing an additional motion seeking sanctions.

Thank you.



J. Chadwick Schnee, Esq.
Schnee Legal Services, LLC
74 E Main Street #648
Lititz, PA 17543
(717) 400-5955
chadwick@schneelegal.com
<http://www.schneelegal.com>