

**IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
CIVIL DIVISION**

JANINE LITMAN and TIMOTHY MAS-
TROIANNI, individually and
jointly,

Plaintiffs,

v.

CANNERY CASINO RESORTS, LLC, a Ne-
vada limited liability company,
WASHINGTON TROTting ASSOCIATION,
INC., a Delaware corporation, WTA
ACQUISITION CORP., a Delaware cor-
poration, CANNERY CASINO RESORTS,
LLC, CANNERY CASINO RESORTS and
WASHINGTON TROTting ASSOCIATION,
INC. t/d/b/a THE MEADOWS RACETRACK
& CASINO, an unincorporated asso-
ciation, CANNERY CASINO RESORTS,
an unincorporated association con-
sisting of one or more yet uniden-
tified natural and/or legal per-
sons, individually and jointly,

Defendants.

CASE NO: 2012-8149

**1023.2(b) CERTIFICATION OF MOTION
FOR SANCTIONS**

On behalf of Plaintiffs

Counsel of Record for this Party:

Gregg R. Zegarelli, Esq.
PA I.D. #52717

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**IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
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JANINE LITMAN and TIMOTHY MAS-
TROIANNI, individually and jointly,

CASE NO: 2012-8149

Plaintiffs,
v.

**1023.2(b) CERTIFICATION OF MO-
TION FOR SANCTIONS**

CANNERY CASINO RESORTS, LLC, a Nevada
limited liability company, WASHINGTON
TROTting ASSOCIATION, INC., a Delaware
corporation, WTA ACQUISITION CORP., a
Delaware corporation, CANNERY CASINO
RESORTS, LLC, CANNERY CASINO RESORTS
and WASHINGTON TROTting ASSOCIATION,
INC. t/d/b/a THE MEADOWS RACETRACK &
CASINO, an unincorporated association,
CANNERY CASINO RESORTS, an unincorpo-
rated association consisting of one or
more yet unidentified natural and/or
legal per-sons, individually and
jointly,

Defendants.

1023.2(b) CERTIFICATION OF MOTION FOR SANCTIONS

The undersigned hereby certifies the attached written notice and demand
was served on counsel for Defendants filing the challenged pleading as
stated therein, Exhibits 1-4. Defendants have not withdrawn of record the
pleading in question, or any part thereof.

March 21, 2014

Respectfully submitted,

TEV LAW GROUP, PC

By: /Gregg Zegarelli/
Gregg R. Zegarelli

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February 10, 2014

William L. Stang, Esq.
Patrick L. Abramowich, Esq.
Fox Rothschild LLP
625 Liberty Avenue, 29th Floor
Pittsburgh, PA 15222-3115

Re: Litman, et. al. v. Cannery Casino Resorts, et. al.
Case No. 2012-8149 (Court of Common Pleas of Washington County)
Sanction Notice

Gentlemen:

You filed Preliminary Objections to Plaintiffs' Reply to New Matter, at the above-referenced case number with the Court of Common Pleas of Washington County. I am notifying you that your filing violates Rule 1023.1 et seq. of the Pennsylvania Rules of Civil Procedure, which governs pleadings to which an attorney affixes his or her signature. It also violates the Judicial Code.

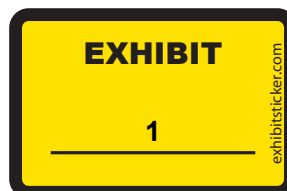
Pursuant to Rule 1023.2, I have attached a Motion for Sanctions, which we will be filed and presented filing after the expiration of twenty-eight (28) days of the date above if you do not withdraw your pleading. Nothing in this motion is a waiver of Plaintiffs' rights.

Very truly yours,

Z E G A R E L L I
Technology & Entrepreneurial
Ventures Law Group, P.C.

By 
Gregg R. Zegarelli

Enclosure



IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
CIVIL DIVISION

JANINE LITMAN and TIMOTHY MAS-
TROIANNI, individually and
jointly,

Plaintiffs,

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WASHINGTON TROTTING ASSOCIATION,
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poration, CANNERY CASINO RESORTS,
LLC, CANNERY CASINO RESORTS and
WASHINGTON TROTTING ASSOCIATION,
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ciation, CANNERY CASINO RESORTS,
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sisting of one or more yet uniden-
tified natural and/or legal per-
sons, individually and jointly,

Defendants.

CASE NO: 2012-8149

NOTICE OF PRESENTATION
MOTION FOR SANCTIONS

On behalf of Plaintiffs

Counsel of Record for this Party:

Gregg R. Zegarelli, Esq.
PA I.D. #52717

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EXHIBIT

2

exhibitsticker.com

**IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
CIVIL DIVISION**

JANINE LITMAN and TIMOTHY MASTROIANNI,
individually and jointly,

CASE NO: 2012-8149

Plaintiffs,

v.

CANNERY CASINO RESORTS, LLC, a Nevada limited liability company, WASHINGTON TROTting ASSOCIATION, INC., a Delaware corporation, WTA ACQUISITION CORP., a Delaware corporation, CANNERY CASINO RESORTS, LLC, CANNERY CASINO RESORTS and WASHINGTON TROTting ASSOCIATION, INC. t/d/b/a THE MEADOWS RACE-TRACK & CASINO, an unincorporated association, CANNERY CASINO RESORTS, an unincorporated association consisting of one or more yet unidentified natural and/or legal persons, individually and jointly,

Defendants.

**RE-NOTICE OF PRESENTATION
MOTION FOR SANCTIONS**

TO:

WILLIAM L. STANG, ESQ.
PATRICK L. ABRAMOWICH
FOX ROTHSCHILD LLP
625 LIBERTY AVENUE, 29TH FLOOR
PITTSBURGH, PA 15222-3115

TAKE NOTICE that Plaintiffs will present their Motion for Sanctions to the Honorable Debbie O'Dell Seneca, Court of Common Pleas of Washington County, Pennsylvania on Friday, April 4, 2014 at 9:30 a.m., as stipulated, simultaneous with Defendants' Preliminary Objections to Plaintiffs' Reply to Defendants' New Matter, or at such other time as the Court may deem appropriate. You are invited to attend.

March 11, 2014

TEV LAW GROUP, PC

By: /Gregg Zegarelli/
Gregg R. Zegarelli

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IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
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JANINE LITMAN and TIMOTHY MASTROIANNI,
individually and jointly,

CASE NO: 2012-8149

Plaintiffs,

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Defendants.

NOTICE OF PRESENTATION
MOTION FOR SANCTIONS

TO:

WILLIAM L. STANG, ESQ.
PATRICK L. ABRAMOWICH
FOX ROTHSCHILD LLP
625 LIBERTY AVENUE, 29TH FLOOR
PITTSBURGH, PA 15222-3115

PLEASE TAKE NOTICE that Plaintiffs will present the following Motion to the Honorable Debbie O'Dell Seneca, Court of Common Pleas of Washington County, Pennsylvania on Tuesday, March 11, 2014 at 9:15 a.m. or at such other time as the Court may deem appropriate. You are invited to attend.

February 10, 2014

TEV LAW GROUP, PC

By: /Gregg Zegarelli/
Gregg R. Zegarelli

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on this date, by depositing the same in the United States Mail, First Class, Postage Pre-Paid, upon the following, except as otherwise stated:

WILLIAM L. STANG, ESQ.
PATRICK ABRAMOWICH, ESQ.
FOX ROTHSCHILD LLP
625 LIBERTY AVENUE, 29TH FLOOR
PITTSBURGH, PA 15222-3115

February 10, 2014

/Gregg Zegarelli/
Gregg R. Zegarelli, Esq.
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IN THE COURT OF COMMON PLEAS
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sons, individually and jointly,

Defendants.

CASE NO: 2012-8149

MOTION FOR SANCTIONS

On behalf of Plaintiffs

Counsel of Record for this Party:

Gregg R. Zegarelli, Esq.
PA I.D. #52717

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IN THE COURT OF COMMON PLEAS
WASHINGTON COUNTY, PENNSYLVANIA
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JANINE LITMAN and TIMOTHY MAS-
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CASE NO: 2012-8149

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Defendants.

MOTION FOR SANCTIONS

1. Defendants filed preliminary objections three times, objecting to each and every count in the Complaint, as demurrers. Plaintiffs tried to re-plead to avoid motion practice, until it became clear that there was nothing Plaintiffs could do to stop Defendants' mechanical thwarting of the proceeding by objections to each and every count by preliminary objections.

2. On the eve of the argument on the Preliminary Objections (months later after the filing of this action), Defendants then also filed a Motion to Dismiss for Lack of Subject-Matter Jurisdiction of this Court, without any reference to controlling provisions, and a completely ungrounded, if not absurd, argument that Plaintiffs should have intervened Gaming Board proceeding that was internally confidential.

3. This Court denied Defendants' Motion to Dismiss. Then, the Defendants further filed a Motion for Reconsideration, presenting it twice, the first time of which was refused (as was certain) by The Hon. Katherine B. Emery, and then further denied by this Court.

4. Having stated that prior conduct, Defendants filed New Matter even though, in substance, the "New Matter" is properly "to the contrary" denials of Plaintiffs' claims. Defendants even pleaded in "New Matter" averments regarding the claims and subject-matter jurisdiction in complete and utter disregard of the multiple rulings of this Court.

5. The Defendants' Preliminary Objections are being presented for an improper purpose, and to harass or cause unnecessary delay or needless increase in the cost of litigation in violation of Pa.R.Civ.P. 1023.1.

6. Plaintiff seeks sanctions against all the Defendants and its counsel of record, as well as an admonishment for such conduct.¹

WHEREFORE, Plaintiffs request the stated sanctions and admonishment stated herein.

February 10, 2014

Respectfully submitted,

TEV LAW GROUP, PC

By: /Gregg Zegarelli/
Gregg R. Zegarelli


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¹ Defendants have also stonewalled proper discovery, the subject of separate motion practice.

IN THE COURT OF COMMON PLEAS
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sons, individually and jointly,

Defendants.

CIVIL DIVISION

CASE NO: 2012-8149

PROPOSED ORDER

On behalf of Plaintiffs

Counsel of Record for this
Party:

Gregg R. Zegarelli, Esq.
PA I.D. #52717

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JANINE LITMAN and TIMOTHY MAS- CIVIL DIVISION
TROIANNI, individually and
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CASE NO: 2012-8149

CANNERY CASINO RESORTS, LLC, a
Nevada limited liability com-
pany, WASHINGTON TROTting ASSO-
CIATION, INC., a Delaware corpo-
ration, WTA ACQUISITION CORP., a
Delaware corporation, CANNERY
CASINO RESORTS, LLC, CANNERY CA-
SINO RESORTS and WASHINGTON
TROTting ASSOCIATION, INC.
t/d/b/a THE MEADOWS RACETRACK &
CASINO, an unincorporated asso-
ciation, CANNERY CASINO RESORTS,
an unincorporated association
consisting of one or more yet
unidentified natural and/or le-
gal persons, individually and
jointly,

Defendants.

ORDER

AND, NOW, this _____ day of March, 2014, upon consideration of
the Plaintiffs' Motion Sanctions, it is hereby ORDERED that each
defendant and its counsel of record shall pay to Plaintiffs the
amount of \$_____, and this Court hereby publicly admon-
ishes Defendants and its counsel for such conduct.

BY THE COURT,

_____, J.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on this date, by depositing the same in the United States Mail, First Class, Postage Pre-Paid, upon the following, except as stated otherwise:

WILLIAM L. STANG, ESQ.
PATRICK ABRAMOWICH, ESQ.
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PITTSBURGH, PA 15222-3115

February 10, 2014

/Gregg Zegarelli/
Gregg R. Zegarelli, Esq.
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February 13, 2014

**VIA EMAIL, FACSIMILE
AND FIRST-CLASS MAIL**

Gregg R. Zegarelli, Esquire
Zegarelli Technology & Entrepreneurial
Ventures Law Group, P.C.
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Pittsburgh, PA 15241

**Re: Janine Litman, et al., v. Cannery Casino Resorts, LLC, et al.
Court of Common Pleas of Washington County, Pennsylvania; No. 2012-8149**

Dear Mr. Zegarelli:

I am writing in response to (i) the Motion for Sanctions, of which I received service yesterday, and (ii) your fax dated February 12, 2014.

With regard to the Motion for Sanctions, Defendants Cannery Casino Resorts, LLC, Washington Trotting Association, Inc., and WTA Acquisition Corp. (collectively, "Defendants") are entitled to have Plaintiffs Janine Litman and Timothy Mastroianni (collectively, "Plaintiffs") allege the factual basis for denying every allegation in Defendants' New Matter. Pa.R.Civ.P. 1029(b). Since Plaintiffs' Reply to New Matter lacked any such factual allegations, Defendants' Preliminary Objections are perfectly appropriate, and the Motion for Sanctions is baseless.

Nonetheless, in an effort to streamline the matters for the Court's consideration, Defendants will exclude from their Preliminary Objections Plaintiffs' answers to Paragraphs 1, 14, 15, 16, 18, 23, 25, and 26 of Defendants' New Matter, which state primarily legal defenses. Accordingly, Defendants will limit the relief sought in their Preliminary Objections to Paragraphs 2 through 13, 17, 19, 20, 21, 22, and 24 of Defendants' New Matter, which are either exclusively or significantly factual in nature.

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia
Florida Nevada New Jersey New York Pennsylvania

ACTIVE 24740127v1





Fox Rothschild LLP
ATTORNEYS AT LAW

Gregg R. Zegarelli, Esquire
February 13, 2014
Page 2.

With regard to your fax, as we discussed on Monday, Defendants are not going to make a piecemeal production and will produce all documents when a stipulated confidentiality order is entered. I trust that the draft I forwarded will be acceptable, and that production can be made soon. In addition, to the extent that Defendants withhold documents from their production based upon claims of privilege, they will provide a privilege log.

Finally, as Mr. Stang is no longer litigating this case, he has requested that all communications be directed exclusively to me.

Very truly yours,

Patrick L. Abramowich

PLA:msh

cc: William L. Stang, Esq.

February 17, 2014

VIA FACSIMILE (412) 391-6984

William L. Stang, Esq.
Patrick L. Abramowich, Esq.
Fox Rothschild LLP
625 Liberty Avenue, 29th Floor
Pittsburgh, PA 15222-3115

Re: Litman, et. al. v. Cannery Casino Resorts, et. al.
Case No. 2012-8149 (Court of Common Pleas of Washington County)
Motion for Sanctions against Defendants

Gentlemen:

Per your letter, dated February 13, 2014, you have now apparently indicated an exclusion regarding your Preliminary Objections to Plaintiffs' Reply to New Matter filed with the Court, in light of Plaintiffs' Motion for Sanctions. Immediately, please forward me a copy of your filed exclusions or withdrawals, as the case may be, properly made of record with the Court.

Nothing in this letter is a waiver of Plaintiffs' rights or in derogation of Plaintiffs' rights or served notice regarding sanctions.

Very truly yours,

Z E G A R E L L I
Technology & Entrepreneurial
Ventures Law Group, P.C.

By: /Gregg Zegarelli/
Gregg R. Zegarelli



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DATE 2/17/2014 10:59:02 AM

To <412391-6984>

FACSIMILE NUMBER 412391-6984

NO. OF PAGES 2

(INCLUDING THIS PAGE)

FROM Gregg R. Zegarelli
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CLIENT/PROJECT Litman v. Cannery

MESSAGE

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on this date, by depositing the same in the United States Mail, First Class, Postage Pre-Paid, upon the following, except as stated otherwise:

PATRICK ABRAMOWICH, ESQ.
BENJAMIN I. FELDMAN, ESQ.
MARK J. PASSERO, ESQ.
WILLIAM L. STANG, ESQ.¹
FOX ROTHSCHILD LLP
625 LIBERTY AVENUE, 29TH FLOOR
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March 21, 2014

/Gregg Zegarelli/
Gregg R. Zegarelli, Esq.
PA I.D. #52717

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¹ It is noted that Mr. Stang has informally requested to no longer be served on pleadings. Because of the multiple attorneys appearing for the Defendants, on February 14, 2014, the undersigned requested to know if Mr. Stang, having formally appeared of record and having personally appeared before this Court, will kindly formally withdraw his appearance of record. The undersigned's request has been ignored and unanswered by Defendants to date. Plaintiffs' request for a formal withdrawal of record is understood by the undersigned as proper, and the timing is important, particularly when sanctions are at issue.