



ENTERED AND FILED

19 SEP 27 PM 3:39

PROthonARY'S OFFICE
LANCASTER, PA

BRUBAKER CONNAUGHTON GOSS & LUCARELLI LLC
By: Robert W. Pontz, Esquire
Attorney I.D. No. 56554
480 New Holland Avenue, Suite 6205
Lancaster, PA 17602
(717) 945-5745 / (717) 945-5764 (Fax)

Attorneys for Plaintiff:
LNP Media Group, Inc.

LNP MEDIA GROUP, INC.,
Plaintiff

: IN THE COURT OF COMMON PLEAS OF
: LANCASTER COUNTY, PENNSYLVANIA
: CIVIL ACTION – LAW

vs.

DANIEL K. TAYLOR,
Defendant

:
:
:
:
:
:
:

No. 19 09279

NOTICE TO DEFEND

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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

09/27/2019

CHECK # 15573
RECEIPT # 112488
(2) attorney \$173.2
(1) Sheriff (12)

No. 19 09279

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lancaster Bar Association
Lawyer Referral Service
28 East Orange Street
Lancaster, PA 17602
Phone: (717) 393-0737

BRUBAKER CONNAUGHTON GOSS &
LUCARELLI LLC
Attorneys for Plaintiff

Date: 9/21/2019

By: 
Robert W. Pontz, Esquire

BRUBAKER CONNAUGHTON GOSS & LUCARELLI LLC
By: Robert W. Pontz, Esquire
Attorney I.D. No. 56554
480 New Holland Avenue, Suite 6205
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Attorneys for Plaintiff:
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: CIVIL ACTION – LAW

vs.

DANIEL K. TAYLOR,
Defendant

:
:
:
: No. 19 09279
:

COMPLAINT

1. The Plaintiff, LNP Media Group, Inc., is a Pennsylvania corporation with its principal offices located at 8 West King Street, P.O. Box 1328, Lancaster, Lancaster County, Pennsylvania 17608-1328.

2. The Defendant, Daniel K. Taylor, is an adult individual engaged in the practice of law and maintaining business offices at 26 East Grant Street, in the City of Lancaster, Lancaster County, Pennsylvania 17602.

COUNT I – BREACH OF CONTRACT

3. As an inducement to Plaintiff to extend credit, Defendant executed and delivered to Plaintiff certain contracts for print and digital advertising for Defendant's business (collectively the "Contracts"). A true and correct copy of the most recently executed Renewal Contract by and between Plaintiff and Defendant is attached hereto, incorporated by reference and marked **Exhibit A**.

4. Pursuant to the terms set forth in the Contracts, and at Defendant's specific insistence and request, between approximately May 31, 2015 and

September 30, 2016, Plaintiff placed advertising and sponsorships for Defendant in certain of Plaintiff's paper and digital publications (the "Advertising").

5. By course of dealing, Defendant placed its orders directly with Plaintiff's representatives and/or by electronic submission thereto.

6. Defendant received invoices (collectively the "Invoices") from time to time on account of the Advertising placed and payments due. Not all of such Invoices remain archived by Plaintiff as of the filing of this Complaint, but a true and correct copy of one of the Invoices, dated as of August 31, 2015, the format and terms of which are the same as all of the other Invoices, is attached hereto, incorporated by reference and marked **Exhibit B**. A final statement of Defendant's account with Plaintiff (the "Account Statement") detailing all of the unpaid billings is attached hereto, incorporated by reference and marked **Exhibit C**.

7. All of the Advertising purchased by Defendant, as reflected in the Invoices and Account Statement, was placed and published by Plaintiff in accordance with the Contracts and at Defendant's specific direction and was accepted by Defendant.

8. The prices of each item of Advertising purchased from Plaintiff by Defendant are as shown on the Account Statement, represent Plaintiff's fair, reasonable and usual prices for such Advertising and are the prices that Defendant agreed to pay.

9. The total amount due and owing from Defendant to Plaintiff as of the date of this Complaint, as set forth in the Account Statement, is Ten Thousand Eight Hundred Ninety-Eight and 74/100 Dollars (\$10,898.74).

10. The amount due and owing, as set forth in paragraph 9, reflects all payments received by Plaintiff on Defendant's account as of the date of this Complaint.

11. Each of the Invoices specifies that the required terms of payment are net 15 days. Accordingly, all amounts set forth in the Account Statement are now past due and owing.

12. Plaintiff has demanded payment from Defendant of the amount set forth in the Account Statement, but despite such demands, Defendant has refused, and continues to refuse, to pay the outstanding balance to Plaintiff in accordance with the terms set forth in the Invoices and Account Statement. A true and correct copy of Plaintiff's most recent demand, through counsel, for payment of the balance set forth in the Account Statement is attached hereto, incorporated by reference and marked **Exhibit D**.

WHEREFORE, Plaintiff demands judgment in its favor and against Defendant Daniel K. Taylor in the amount of Ten Thousand Eight Hundred Ninety-Eight and 74/100 Dollars (\$10,898.74), together with costs of this action and such other and further amounts as are permitted by law.

COUNT II – UNJUST ENRICHMENT

The allegations of paragraphs 1 through 12 are incorporated by reference.

13. If Defendant is allowed to retain the value of the Advertising placed and published by Plaintiff at Defendant's direction, as documented in the Account Statement, without paying Plaintiff the amounts owed, Defendant will be unjustly enriched in the sum of Ten Thousand Eight Hundred Ninety-Eight and 74/100 Dollars (\$10,898.74).

WHEREFORE, in the alternative to Count I, Plaintiff demands judgment in its favor and against Defendant Daniel K. Taylor in the amount of Ten Thousand Eight Hundred Ninety-Eight and 74/100 Dollars (\$10,898.74), together with costs of this action and such other and further amounts as are permitted by law.

COUNT III – ACCOUNT STATED

The allegations of paragraphs 1 through 13 are incorporated by reference.

14. From approximately April 2014 through September 2016, inclusive, Plaintiff submitted to Defendant invoices for advertising placed and published by Plaintiff pursuant to the Contracts and at Defendant's insistence and request, and Defendant made payment upon all such prior invoices, excluding only those that are the subject of this Complaint. The Invoices that are the subject of this civil action constitute a subset of the invoices submitted by Plaintiff to Defendant during the course of their business relationship, specifically the invoices on which payment by Defendant remains due and owing.

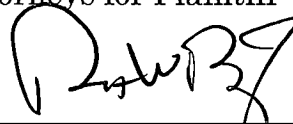
15. Defendant has not denied that the amounts due as reflected in the Account Statement are due and owing, nor has Defendant disputed the amounts set forth therein.

16. The total of the Invoices, as set forth in the Account Statement, constitutes an account stated by and between Plaintiff and Defendant.

WHEREFORE, in the alternative to Count I and Count II, Plaintiff demands judgment in its favor and against Defendant Daniel K. Taylor in the amount of Ten Thousand Eight Hundred Ninety-Eight and 74/100 Dollars (\$10,898.74), together with costs of this action and such other and further amounts as are permitted by law.

BRUBAKER CONNAUGHTON GOSS
& LUCARELLI LLC
Attorneys for Plaintiff

Date: 9/27/2019


By: 

Robert W. Pontz, Esquire

VERIFICATION

I, Kathleen Sapio, hereby verify that I am the Credit & Collection Manager for LNP Media Group, Inc., the Plaintiff herein; that as such I am authorized to make this Verification; and that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: 9.26.2019



Kathleen Sapio
Credit & Collection Manager,
LNP Media Group, Inc.

EXHIBIT A

20166020 ✓

Renewal Membership Agreement

2016/2017 Renewal Incentive:

Hold current rate and receive free full color, plus double your ad 12 times during the year.

Please select the advertising package you wish to purchase:

- Platinum Package (3x5) \$ _____ / week
- Gold Package (2x5) \$ _____ / week
- Silver Package (2x3) \$ 175.00 / week

1. The advertising placed in this Agreement may only be used to promote [NAME OF BUSINESS] Daniel K Taylor Attorney at Law products and services and is nontransferable.
2. In the event of cancellation, the advertiser agrees to pay all applicable online and ad production charges related to the advertising campaign.
3. This Agreement is binding. In light of the discounted advertising rates you are being offered, in the event of non-compliance or cancellation, LNP MEDIA GROUP, Inc. reserves the right to recover from you the price of all advertising for you at the base rates as per the LNP MEDIA GROUP, Inc. published rate card for the period in which the schedule ran.
4. The Program and your schedule will begin only after you have approved your ad.
5. [NAME OF DECISION MAKER] Daniel K Taylor Attorney at Law agrees to the Terms and Conditions of the Agreement and is aware that LNP MEDIA GROUP, Inc. trading terms are payment within 30 days.

Authorized for and on behalf of [NAME OF BUSINESS]

Authorized for and on behalf of LNP Media Group, Inc.

[Signature]
 X Signature
Daniel K Taylor
 X Name
 Position
9-18-15
 X Date

[Signature]
 Signature
John Halfpenny
 Name
Multi-Media Advertising Rep
 Position
9/18/15
 Date

EXHIBIT B

BILLING PERIOD		ADVERTISER/CLIENT NAME	
8/1/15 to 8/31/15		DANIEL K TAYLOR ATTORNEY AT	
TOTAL AMOUNT DUE	*UNAPPLIED AMOUNT	TERMS OF PAYMENT	
6,293.36	0.00	Net 15 Days	
CURRENT NET DUE	30 DAYS	60 DAYS	OVER 90 DAYS
704.86	785.10	704.86	4,098.54

**ADVERTISING
 INVOICE and STATEMENT**

Account Number: 20166020
 Sales Rep: John Halfpenny 717-291-8885

DANIEL K TAYLOR ATTORNEY AT LAW
 DAN TAYLOR
 25 E GRANT ST
 LANCASTER PA 17602

TOTAL AMOUNT DUE
\$6,293.36

AMOUNT PAID

LR

RETURN THIS PORTION WITH REMITTANCE

DATE	PUB	REFERENCE	DESCRIPTION	TIMES	COL	DEPTH	UNITS	RATE	AMOUNT	TOTAL
			BALANCE BROUGHT FORWARD							6,263.50
8/3/15		0	ON ACCOUNT CHECK # 1752						-675.00	-675.00
8/4/15	IJ	3419612	NRS ADVERTISING AD IMPACT LOCAL		2.0	3.00	6.00	80.24	80.24	80.24
8/8/15	IJ	3419612	NRS ADVERTISING AD IMPACT LOCAL		2.0	3.00	6.00	80.24	80.24	80.24
8/9/15	SN	3419625	NRS ADVERTISING AD IMPACT SPORTS		2.0	3.00	6.00	80.24	80.24	80.24
8/12/15	IJ	3419625	NRS ADVERTISING AD IMPACT SPORTS		2.0	3.00	6.00	80.24	80.24	80.24
8/17/15	IJ	3419626	NRS ADVERTISING AD IMPACT OBITUARIES		2.0	3.00	6.00	80.24	80.24	80.24
8/20/15	IJ	3419626	NRS ADVERTISING AD IMPACT OBITUARIES		2.0	3.00	6.00	80.24	80.24	80.24
8/25/15	IJ	3419628	NRS ADVERTISING AD IMPACT OBITUARIES		2.0	3.00	6.00	80.24	80.24	80.24
8/28/15	IJ	3419628	NRS ADVERTISING AD IMPACT OBITUARIES		2.0	3.00	6.00	80.24	80.24	80.24
8/31/15	LO	3413410	NRS DIGITAL 30K MR/LB		1.0	0.25	0.25	62.94	62.94	62.94

BILLING PERIOD		ADVERTISER/CLIENT NAME	
8/1/15 to 8/31/15		DANIEL K TAYLOR ATTORNEY AT	
TOTAL AMOUNT DUE	*UNAPPLIED AMOUNT	TERMS OF PAYMENT	
6,293.36	0.00	Net 15 Days	
CURRENT NET DUE	30 DAYS	60 DAYS	OVER 90 DAYS
704.86	785.10	704.86	4,098.54

Sales Rep: John Halfpenny 717-291-8885

LR

STATEMENT DATE	ADVERTISER ACCOUNT NAME	ACCOUNT NUMBER
8/31/15	DANIEL K TAYLOR ATTORNEY AT	20166020

LNP MEDIA GROUP, Inc.
 8 West King Street, P.O. Box 1328, Lancaster, PA 17608-1328
 email:advertising@LNPnews.com
 www.LancasterOnline.com

BILLING PERIOD		ADVERTISER/CLIENT NAME	
8/1/15 to 8/31/15		DANIEL K TAYLOR ATTORNEY AT	
TOTAL AMOUNT DUE	*UNAPPLIED AMOUNT	TERMS OF PAYMENT	
6,293.36	0.00	Net 15 Days	
CURRENT NET DUE	30 DAYS	60 DAYS	OVER 90 DAYS
704.86	785.10	704.86	4,098.54

**ADVERTISING
 INVOICE and STATEMENT**

Account Number: 20166020
 Sales Rep: John Halfpenny 717-291-8885

DANIEL K TAYLOR ATTORNEY AT LAW
 DAN TAYLOR
 25 E GRANT ST
 LANCASTER PA 17602

TOTAL AMOUNT DUE
\$6,293.36
AMOUNT PAID

LR

RETURN THIS PORTION WITH REMITTANCE

DATE	PUB	REFERENCE	DESCRIPTION	TIMES	COL	DEPTH	UNITS	RATE	AMOUNT	TOTAL
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LNP MEDIA GROUP, Inc.
 8 West King Street, P.O. Box 1328, Lancaster, PA 17608-1328

Sales Rep: John Halfpenny 717-291-8885

BILLING PERIOD		ADVERTISER/CLIENT NAME	
8/1/15 to 8/31/15		DANIEL K TAYLOR ATTORNEY AT	
TOTAL AMOUNT DUE	*UNAPPLIED AMOUNT	TERMS OF PAYMENT	
6,293.36	0.00	Net 15 Days	
CURRENT NET DUE	30 DAYS	60 DAYS	OVER 90 DAYS
704.86	785.10	704.86	4,098.54

LR

STATEMENT DATE	ADVERTISER/ACCOUNT NAME	ACCOUNT NUMBER
8/31/15	DANIEL K TAYLOR ATTORNEY AT	20166020

EXHIBIT C

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
05/31/15	LO	3392354	\$ 62.94	30K MR/LB
07/27/15	IJ	3419609	\$ 20.32	AD IMPACT
07/31/15	IJ	3419609	\$ 80.24	AD IMPACT
08/04/15	IJ	3419612	\$ 80.24	AD IMPACT
08/08/15	IJ	3419612	\$ 80.24	AD IMPACT
08/09/15	SN	3419625	\$ 80.24	AD IMPACT
08/12/15	IJ	3419625	\$ 80.24	AD IMPACT
08/17/15	IJ	3419626	\$ 80.24	AD IMPACT
08/20/15	IJ	3419626	\$ 80.24	AD IMPACT
08/25/15	IJ	3419628	\$ 80.24	AD IMPACT
08/28/15	IJ	3419628	\$ 80.24	AD IMPACT
08/31/15	LO	3413410	\$ 62.94	30K MR/LB
09/02/15	IJ	3435126	\$ 80.24	AD IMPACT
09/05/15	IJ	3435126	\$ 80.24	AD IMPACT
09/06/15	SN	3435128	\$ 80.24	AD IMPACT
09/10/15	IJ	3435128	\$ 80.24	AD IMPACT
09/14/15	IJ	3435131	\$ 80.24	AD IMPACT
09/18/15	IJ	3435131	\$ 80.24	AD IMPACT
09/22/15	IJ	3435132	\$ 80.24	AD IMPACT
09/26/15	IJ	3435132	\$ 80.24	AD IMPACT
09/27/15	SN	3435133	\$ 80.24	AD IMPACT
09/30/15	LO	3436751	\$ 62.94	30K MR/LB
09/30/15	IJ	3435133	\$ 80.24	AD IMPACT
10/05/15	IJ	3462845	\$ 80.24	AD IMPACT
10/08/15	IJ	3462845	\$ 80.24	AD IMPACT
10/13/15	IJ	3462846	\$ 80.24	AD IMPACT
10/16/15	IJ	3462846	\$ 80.24	AD IMPACT
10/21/15	IJ	3462847	\$ 80.24	AD IMPACT
10/24/15	IJ	3462847	\$ 80.24	AD IMPACT
10/25/15	SN	3462848	\$ 80.24	AD IMPACT
10/29/15	IJ	3462848	\$ 80.24	AD IMPACT
10/31/15	LO	3436751	\$ 62.94	30K MR/LB
11/02/15	IJ	3478543	\$ 80.24	AD IMPACT
11/06/15	IJ	3478543	\$ 80.24	AD IMPACT
11/06/15	IJ	3488681	\$ 64.80	VETERAN'S DAY
11/10/15	IJ	3478553	\$ 80.24	AD IMPACT
11/14/15	IJ	3478553	\$ 80.24	AD IMPACT
11/15/15	SN	3478562	\$ 80.24	AD IMPACT
11/18/15	IJ	3478562	\$ 80.24	AD IMPACT
11/23/15	IJ	3478563	\$ 80.24	AD IMPACT
11/26/15	IJ	3478563	\$ 80.24	AD IMPACT
11/30/15	LO	3468482	\$ 62.94	30K MR/LB
12/01/15	IJ	3493168	\$ 80.24	AD IMPACT
12/04/15	IJ	3493168	\$ 80.24	AD IMPACT
12/09/15	IJ	3493172	\$ 80.24	AD IMPACT
12/12/15	IJ	3493172	\$ 80.24	AD IMPACT
12/13/15	SN	3493174	\$ 80.24	AD IMPACT
12/17/15	IJ	3493174	\$ 80.24	AD IMPACT
12/21/15	IJ	3493177	\$ 80.24	AD IMPACT
12/25/15	IJ	3493177	\$ 80.24	AD IMPACT
12/29/15	IJ	3493180	\$ 80.24	AD IMPACT

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
12/31/15	LO	3468482	\$ 62.94	30K MR/LB
01/02/16	IJ	3493180	\$ 80.24	AD IMPACT
01/03/16	SN	3500808	\$ 80.24	AD IMPACT
01/06/16	IJ	3500808	\$ 80.24	AD IMPACT
01/11/16	IJ	3500810	\$ 80.24	AD IMPACT
01/14/16	IJ	3500810	\$ 80.24	AD IMPACT
01/19/16	IJ	3500812	\$ 80.24	AD IMPACT
01/22/16	IJ	3500812	\$ 80.24	AD IMPACT
01/27/16	IJ	3500813	\$ 80.24	AD IMPACT
01/30/16	IJ	3500813	\$ 80.24	AD IMPACT
01/31/16	LO	3495702	\$ 62.94	30K MR/LB
01/31/16	SN	3500814	\$ 80.24	AD IMPACT
02/04/16	IJ	3500814	\$ 80.24	AD IMPACT
02/08/16	IJ	3520440	\$ 80.24	AD IMPACT
02/12/16	IJ	3520440	\$ 80.24	AD IMPACT
02/16/16	IJ	3520443	\$ 80.24	AD IMPACT
02/20/16	IJ	3520443	\$ 80.24	AD IMPACT
02/21/16	SN	3520444	\$ 80.24	AD IMPACT
02/24/16	IJ	3520444	\$ 80.24	AD IMPACT
02/29/16	LO	3495702	\$ 62.94	30K MR/LB
02/29/16	IJ	3527539	\$ 80.24	AD IMPACT
03/03/16	IJ	3527539	\$ 80.24	AD IMPACT
03/08/16	IJ	3527544	\$ 80.24	AD IMPACT
03/11/16	IJ	3527544	\$ 80.24	AD IMPACT
03/16/16	IJ	3527620	\$ 80.24	AD IMPACT
03/19/16	IJ	3527620	\$ 80.24	AD IMPACT
03/20/16	SN	3527624	\$ 80.24	AD IMPACT
03/24/16	IJ	3527624	\$ 80.24	AD IMPACT
03/28/16	IJ	3527626	\$ 80.24	AD IMPACT
03/31/16	LO	3495702	\$ 62.94	30K MR/LB
04/01/16	IJ	3527626	\$ 80.24	AD IMPACT
04/06/16	IJ	3553469	\$ 80.24	AD IMPACT
04/09/16	IJ	3553469	\$ 80.24	AD IMPACT
04/10/16	SN	3553470	\$ 80.24	AD IMPACT
04/14/16	IJ	3553470	\$ 80.24	AD IMPACT
04/18/16	IJ	3553474	\$ 80.24	AD IMPACT
04/22/16	IJ	3553474	\$ 80.24	AD IMPACT
04/26/16	IJ	3553475	\$ 80.24	AD IMPACT
04/30/16	LO	3552809	\$ 62.94	30K
04/30/16	IJ	3553475	\$ 80.24	AD IMPACT
05/01/16	SN	3574477	\$ 80.24	AD IMPACT
05/04/16	IJ	3574477	\$ 80.24	AD IMPACT
05/09/16	IJ	3574478	\$ 80.24	AD IMPACT
05/11/16	IJ	3574478	\$ 80.24	AD IMPACT
05/17/16	IJ	3574479	\$ 80.24	AD IMPACT
05/20/16	IJ	3574479	\$ 80.24	AD IMPACT
05/25/16	IJ	3574480	\$ 80.24	AD IMPACT
05/28/16	IJ	3574480	\$ 80.24	AD IMPACT
05/29/16	SN	3574483	\$ 80.24	AD IMPACT
05/31/16	LO	3552809	\$ 62.94	30K
06/02/16	IJ	3574483	\$ 80.24	AD IMPACT
06/06/16	IJ	3584224	\$ 80.24	AD IMPACT
06/10/16	IJ	3584224	\$ 80.24	AD IMPACT

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
06/14/16	IJ	3584225	\$ 80.24	AD IMPACT
06/18/16	IJ	3584225	\$ 80.24	AD IMPACT
06/19/16	SN	3584229	\$ 80.24	AD IMPACT
06/22/16	IJ	3584229	\$ 80.24	AD IMPACT
06/27/16	IJ	3584230	\$ 80.24	AD IMPACT
06/30/16	LO	3552809	\$ 62.94	30K
06/30/16	IJ	3584230	\$ 80.24	AD IMPACT
07/05/16	IJ	3598531	\$ 80.24	AD IMPACT
07/08/16	IJ	3598531	\$ 80.24	AD IMPACT
07/13/16	IJ	3598535	\$ 80.24	AD IMPACT
07/16/16	IJ	3598535	\$ 80.24	AD IMPACT
07/17/16	SN	3598536	\$ 80.24	AD IMPACT
07/21/16	IJ	3598536	\$ 80.24	AD IMPACT
07/25/16	IJ	3598537	\$ 80.24	AD IMPACT
07/29/16	IJ	3598537	\$ 80.24	AD IMPACT
07/31/16	LO	3552809	\$ 62.94	30K
08/03/16	IJ	3611320	\$ 80.24	AD IMPACT
08/06/16	IJ	3611320	\$ 80.24	AD IMPACT
08/07/16	SN	3611322	\$ 80.24	AD IMPACT
08/11/16	IJ	3611322	\$ 80.24	AD IMPACT
08/15/16	IJ	3611325	\$ 80.24	AD IMPACT
08/19/16	IJ	3611325	\$ 80.24	AD IMPACT
08/23/16	IJ	3611326	\$ 80.24	AD IMPACT
08/27/16	IJ	3611326	\$ 80.24	AD IMPACT
08/28/16	SN	3611328	\$ 80.24	AD IMPACT
08/31/16	LO	3599767	\$ 62.94	30K
08/31/16	LO	3599767	\$ 62.94	30K
08/31/16	IJ	3611328	\$ 80.24	AD IMPACT
09/05/16	IJ	3611330	\$ 80.24	AD IMPACT
09/08/16	IJ	3611330	\$ 80.24	AD IMPACT
09/13/16	IJ	3611332	\$ 80.24	AD IMPACT
09/16/16	IJ	3611332	\$ 80.24	AD IMPACT
09/21/16	IJ	3611335	\$ 80.24	AD IMPACT
09/24/16	IJ	3611335	\$ 80.24	AD IMPACT
09/25/16	SN	3611336	\$ 80.24	AD IMPACT
09/29/16	IJ	3611336	\$ 80.24	AD IMPACT

BALANCE DUE

\$ 10,898.74

EXHIBIT D



BRUBAKER CONNAUGHTON
GOSS & LUCARELLI ^{LLC}
ATTORNEYS AT LAW

Robert W. Pontz, Esquire

rbop@bcgl-law.com
Direct Dial: 717-945-5747

August 5, 2019

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

Daniel K. Taylor, Esquire
25 East Grant Street
Lancaster, PA 17602

Re: Account with LNP Media Group, Inc.

Dear Mr. Taylor:

We represent LNP Media Group, Inc. Over a period of several years, our client provided your law firm with advertising and related services pursuant to one or more written contracts. Our client advises us that, at present, your account is delinquent in that certain charges posted from May 2015 to September 2016 remain unpaid. An itemized statement of your unpaid account balance is enclosed for your reference.

Despite our client's repeated billings and communications, payment of the charges reflected on the enclosed statement has not been received. Our client has requested that we write on its behalf to request your review of the enclosed statement and, assuming that you find the charges in order, prompt payment in the total amount of **\$10,898.74**. If there is some issue with the charges reflected on the statement, please advise me of the particulars. Our client still would prefer to resolve this matter on an amicable and professional basis. But for that to occur, payment against the statement balance must begin immediately.

Thank you for your prompt attention to this matter.

Very truly yours,

Robert W. Pontz

717309.doc

Enclosure

cc (w/encl.): Kathleen Sapio,
Credit & Collections Manager

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
05/31/15	LO	3392354	\$ 62.94	30K MR/LB
07/27/15	IJ	3419609	\$ 20.32	AD IMPACT
07/31/15	IJ	3419609	\$ 80.24	AD IMPACT
08/04/15	IJ	3419612	\$ 80.24	AD IMPACT
08/08/15	IJ	3419612	\$ 80.24	AD IMPACT
08/09/15	SN	3419625	\$ 80.24	AD IMPACT
08/12/15	IJ	3419625	\$ 80.24	AD IMPACT
08/17/15	IJ	3419626	\$ 80.24	AD IMPACT
08/20/15	IJ	3419626	\$ 80.24	AD IMPACT
08/25/15	IJ	3419628	\$ 80.24	AD IMPACT
08/28/15	IJ	3419628	\$ 80.24	AD IMPACT
08/31/15	LO	3413410	\$ 62.94	30K MR/LB
09/02/15	IJ	3435126	\$ 80.24	AD IMPACT
09/05/15	IJ	3435126	\$ 80.24	AD IMPACT
09/06/15	SN	3435128	\$ 80.24	AD IMPACT
09/10/15	IJ	3435128	\$ 80.24	AD IMPACT
09/14/15	IJ	3435131	\$ 80.24	AD IMPACT
09/18/15	IJ	3435131	\$ 80.24	AD IMPACT
09/22/15	IJ	3435132	\$ 80.24	AD IMPACT
09/26/15	IJ	3435132	\$ 80.24	AD IMPACT
09/27/15	SN	3435133	\$ 80.24	AD IMPACT
09/30/15	LO	3436751	\$ 62.94	30K MR/LB
09/30/15	IJ	3435133	\$ 80.24	AD IMPACT
10/05/15	IJ	3462845	\$ 80.24	AD IMPACT
10/08/15	IJ	3462845	\$ 80.24	AD IMPACT
10/13/15	IJ	3462846	\$ 80.24	AD IMPACT
10/16/15	IJ	3462846	\$ 80.24	AD IMPACT
10/21/15	IJ	3462847	\$ 80.24	AD IMPACT
10/24/15	IJ	3462847	\$ 80.24	AD IMPACT
10/25/15	SN	3462848	\$ 80.24	AD IMPACT
10/29/15	IJ	3462848	\$ 80.24	AD IMPACT
10/31/15	LO	3436751	\$ 62.94	30K MR/LB
11/02/15	IJ	3478543	\$ 80.24	AD IMPACT
11/06/15	IJ	3478543	\$ 80.24	AD IMPACT
11/06/15	IJ	3488681	\$ 64.80	VETERAN'S DAY
11/10/15	IJ	3478553	\$ 80.24	AD IMPACT
11/14/15	IJ	3478553	\$ 80.24	AD IMPACT
11/15/15	SN	3478562	\$ 80.24	AD IMPACT
11/18/15	IJ	3478562	\$ 80.24	AD IMPACT
11/23/15	IJ	3478563	\$ 80.24	AD IMPACT
11/26/15	IJ	3478563	\$ 80.24	AD IMPACT
11/30/15	LO	3468482	\$ 62.94	30K MR/LB
12/01/15	IJ	3493168	\$ 80.24	AD IMPACT
12/04/15	IJ	3493168	\$ 80.24	AD IMPACT
12/09/15	IJ	3493172	\$ 80.24	AD IMPACT
12/12/15	IJ	3493172	\$ 80.24	AD IMPACT
12/13/15	SN	3493174	\$ 80.24	AD IMPACT
12/17/15	IJ	3493174	\$ 80.24	AD IMPACT
12/21/15	IJ	3493177	\$ 80.24	AD IMPACT
12/25/15	IJ	3493177	\$ 80.24	AD IMPACT
12/29/15	IJ	3493180	\$ 80.24	AD IMPACT

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
12/31/15	LO	3468482	\$ 62.94	30K MR/LB
01/02/16	IJ	3493180	\$ 80.24	AD IMPACT
01/03/16	SN	3500808	\$ 80.24	AD IMPACT
01/06/16	IJ	3500808	\$ 80.24	AD IMPACT
01/11/16	IJ	3500810	\$ 80.24	AD IMPACT
01/14/16	IJ	3500810	\$ 80.24	AD IMPACT
01/19/16	IJ	3500812	\$ 80.24	AD IMPACT
01/22/16	IJ	3500812	\$ 80.24	AD IMPACT
01/27/16	IJ	3500813	\$ 80.24	AD IMPACT
01/30/16	IJ	3500813	\$ 80.24	AD IMPACT
01/31/16	LO	3495702	\$ 62.94	30K MR/LB
01/31/16	SN	3500814	\$ 80.24	AD IMPACT
02/04/16	IJ	3500814	\$ 80.24	AD IMPACT
02/08/16	IJ	3520440	\$ 80.24	AD IMPACT
02/12/16	IJ	3520440	\$ 80.24	AD IMPACT
02/16/16	IJ	3520443	\$ 80.24	AD IMPACT
02/20/16	IJ	3520443	\$ 80.24	AD IMPACT
02/21/16	SN	3520444	\$ 80.24	AD IMPACT
02/24/16	IJ	3520444	\$ 80.24	AD IMPACT
02/29/16	LO	3495702	\$ 62.94	30K MR/LB
02/29/16	IJ	3527539	\$ 80.24	AD IMPACT
03/03/16	IJ	3527539	\$ 80.24	AD IMPACT
03/08/16	IJ	3527544	\$ 80.24	AD IMPACT
03/11/16	IJ	3527544	\$ 80.24	AD IMPACT
03/16/16	IJ	3527620	\$ 80.24	AD IMPACT
03/19/16	IJ	3527620	\$ 80.24	AD IMPACT
03/20/16	SN	3527624	\$ 80.24	AD IMPACT
03/24/16	IJ	3527624	\$ 80.24	AD IMPACT
03/28/16	IJ	3527626	\$ 80.24	AD IMPACT
03/31/16	LO	3495702	\$ 62.94	30K MR/LB
04/01/16	IJ	3527626	\$ 80.24	AD IMPACT
04/06/16	IJ	3553469	\$ 80.24	AD IMPACT
04/09/16	IJ	3553469	\$ 80.24	AD IMPACT
04/10/16	SN	3553470	\$ 80.24	AD IMPACT
04/14/16	IJ	3553470	\$ 80.24	AD IMPACT
04/18/16	IJ	3553474	\$ 80.24	AD IMPACT
04/22/16	IJ	3553474	\$ 80.24	AD IMPACT
04/26/16	IJ	3553475	\$ 80.24	AD IMPACT
04/30/16	LO	3552809	\$ 62.94	30K
04/30/16	IJ	3553475	\$ 80.24	AD IMPACT
05/01/16	SN	3574477	\$ 80.24	AD IMPACT
05/04/16	IJ	3574477	\$ 80.24	AD IMPACT
05/09/16	IJ	3574478	\$ 80.24	AD IMPACT
05/11/16	IJ	3574478	\$ 80.24	AD IMPACT
05/17/16	IJ	3574479	\$ 80.24	AD IMPACT
05/20/16	IJ	3574479	\$ 80.24	AD IMPACT
05/25/16	IJ	3574480	\$ 80.24	AD IMPACT
05/28/16	IJ	3574480	\$ 80.24	AD IMPACT
05/29/16	SN	3574483	\$ 80.24	AD IMPACT
05/31/16	LO	3552809	\$ 62.94	30K
06/02/16	IJ	3574483	\$ 80.24	AD IMPACT
06/06/16	IJ	3584224	\$ 80.24	AD IMPACT
06/10/16	IJ	3584224	\$ 80.24	AD IMPACT

LNP MEDIA GROUP
STATEMENT OF ACCOUNT
DANIEL K TAYLOR, ATTORNEY AT LAW
ACCOUNT # 20166020

<u>DATE</u>	<u>PUBLICATION</u>	<u>AD TICKET #</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
06/14/16	IJ	3584225	\$ 80.24	AD IMPACT
06/18/16	IJ	3584225	\$ 80.24	AD IMPACT
06/19/16	SN	3584229	\$ 80.24	AD IMPACT
06/22/16	IJ	3584229	\$ 80.24	AD IMPACT
06/27/16	IJ	3584230	\$ 80.24	AD IMPACT
06/30/16	LO	3552809	\$ 62.94	30K
06/30/16	IJ	3584230	\$ 80.24	AD IMPACT
07/05/16	IJ	3598531	\$ 80.24	AD IMPACT
07/08/16	IJ	3598531	\$ 80.24	AD IMPACT
07/13/16	IJ	3598535	\$ 80.24	AD IMPACT
07/16/16	IJ	3598535	\$ 80.24	AD IMPACT
07/17/16	SN	3598536	\$ 80.24	AD IMPACT
07/21/16	IJ	3598536	\$ 80.24	AD IMPACT
07/25/16	IJ	3598537	\$ 80.24	AD IMPACT
07/29/16	IJ	3598537	\$ 80.24	AD IMPACT
07/31/16	LO	3552809	\$ 62.94	30K
08/03/16	IJ	3611320	\$ 80.24	AD IMPACT
08/06/16	IJ	3611320	\$ 80.24	AD IMPACT
08/07/16	SN	3611322	\$ 80.24	AD IMPACT
08/11/16	IJ	3611322	\$ 80.24	AD IMPACT
08/15/16	IJ	3611325	\$ 80.24	AD IMPACT
08/19/16	IJ	3611325	\$ 80.24	AD IMPACT
08/23/16	IJ	3611326	\$ 80.24	AD IMPACT
08/27/16	IJ	3611326	\$ 80.24	AD IMPACT
08/28/16	SN	3611328	\$ 80.24	AD IMPACT
08/31/16	LO	3599767	\$ 62.94	30K
08/31/16	LO	3599767	\$ 62.94	30K
08/31/16	IJ	3611328	\$ 80.24	AD IMPACT
09/05/16	IJ	3611330	\$ 80.24	AD IMPACT
09/08/16	IJ	3611330	\$ 80.24	AD IMPACT
09/13/16	IJ	3611332	\$ 80.24	AD IMPACT
09/16/16	IJ	3611332	\$ 80.24	AD IMPACT
09/21/16	IJ	3611335	\$ 80.24	AD IMPACT
09/24/16	IJ	3611335	\$ 80.24	AD IMPACT
09/25/16	SN	3611336	\$ 80.24	AD IMPACT
09/29/16	IJ	3611336	\$ 80.24	AD IMPACT

BALANCE DUE \$ 10,898.74

ENTERED AND FILED

19 SEP 27 PM 3:39

PROthonotary's OFFICE
LANCASTER, PA

BRUBAKER CONNAUGHTON GOSS & LUCARELLI LLC
By: Robert W. Pontz, Esquire
Attorney I.D. No. 56554
480 New Holland Avenue, Suite 6205
Lancaster, PA 17602
(717) 945-5745 / (717) 945-5764 (Fax)

Attorneys for Plaintiff:
LNP Media Group, Inc.

LNP MEDIA GROUP, INC.,
Plaintiff

: IN THE COURT OF COMMON PLEAS OF
: LANCASTER COUNTY, PENNSYLVANIA
: CIVIL ACTION – LAW

vs.

DANIEL K. TAYLOR,
Defendant

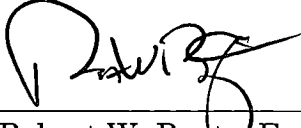
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: No. 19 09279
:

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *public access policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellant and Trial Courts* that require filing of confidential information and documents differently than non-confidential information and documents.

BRUBAKER CONNAUGHTON GOSS
& LUCARELLI LLC
Attorneys for Plaintiff

Dated: 9/27/2019

By: 
Robert W. Pontz, Esquire
Attorney I.D. No. 56554

PROTHONOTARY
CIVIL COVER SHEET

ENTERED AND FILED

PLEASE LIST NAMES AND ADDRESSES OF ADDITIONAL PARTIES ON A SEPARATE SHEET

19 SEP 27 PM 3:39

ALL PARTY INFORMATION IS REQUIRED INCLUDING ZIP CODES. ALL PARTY INFORMATION MUST MATCH THE PLEADING. PLEASE DO NOT STAPLE THE COVER SHEET TO THE PLEADING. IF AN EVENT NEEDS TO BE SCHEDULED, A CAO SCHEDULING COVER SHEET MUST ALSO BE ATTACHED.

For Prothonotary Use Only:

DOCKET No: CI - 19 09279

TYPE OF ACTION: Complaint

PARTY INFORMATION

PLAINTIFF'S NAME: LNP Media Group, Inc.

DEFENDANT'S NAME: Daniel K. Taylor

ADDRESS: 8 West King Street
If confidential, use 2nd sheet P.O. Box 1328
Lancaster, PA 17608-1328

ADDRESS: 26 East Grant Street
Lancaster, PA 17602

MUNICIPALITY: City of Lancaster

MUNICIPALITY: City of Lancaster

TWP/BOROUGH: _____

TWP/BOROUGH: _____

DOB: _____ TELEPHONE #: _____
(mm/dd/yyyy) (#####)

DOB: _____ TELEPHONE #: _____
(mm/dd/yyyy) (#####)

FILING ATTORNEY / FILING PARTY INFORMATION

FIRM/OFFICE: Brubaker Connaughton Goss & Lucarelli LLC

FILING ATTORNEY/PARTY: Robert W. Pontz, Esquire/Plaintiff

AOPC: (Attorney ID) #: 56554

ADDRESS: 480 New Holland Avenue, Suite 6205 CITY: Lancaster STATE: PA ZIP CODE: 17602

TELEPHONE #: (717) 945-5745 EMAIL: bobp@bcgl-law.com
(#####)

TAX LIEN INFORMATION

MUNICIPALITY: _____ MAP REFERENCE: _____

DEED BOOK: _____ DEED PAGE: _____ DEED DATE: _____

SALE PRICE: _____ TAX YEAR: _____ TAX LIEN AMOUNT: _____

PROPERTY DESCRIPTION: _____

PFA/SVPO/PFI INFORMATION

HEARING DATE: _____ SOCIAL SECURITY #: (Defendant - Last 4 digits) _____

POLICE DEPARTMENT: _____

PREVIOUS PETITIONS: YES NO If 'YES', File Date: _____

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet

LANCASTER

County

ENTERED AND FILED	
For Prothonotary Use Only:	
Docket No:	19 SEP 27 PM 3:38
19 09 27 9	
PROTHONOTARY'S OFFICE LANCASTER, PA	

TIME STAMP

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 checked="" type="checkbox"/> Complaint	<input type="checkbox"/> Writ of Summons
<input type="checkbox"/> Transfer from Another Jurisdiction	<input type="checkbox"/> Declaration of Taking
<input type="checkbox"/> Petition	
Lead Plaintiff's Name: LNP Media Group, Inc.	Lead Defendant's Name: Daniel K. Taylor
Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dollar Amount Requested: <input checked="" type="checkbox"/> within arbitration limits (check one) <input type="checkbox"/> outside arbitration limits
Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Name of Plaintiff/Appellant's Attorney: Robert W. Pontz, Esquire	
<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/Libel/ 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 checked="" 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 type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____ _____		