#### FELDMAN, SHEPHERD, WOHLGELERNTER, TANNER, WEINSTOCK & DODIG, LLP

BY: MARK W. TANNER, ESQUIRE JAMES P. FAUNES, ESQUIRE IDENTIFICATION NO.: 58738/315174 1845 WALNUT STREET, 21ST FLOOR PHILADELPHIA, PA 19103 (215) 567-8300



JESSICA LYBRAND, in her own right and as Administratrix of the Estate of ZACHARY TYLER LYBRAND, Deceased, 9 Birch Street
Middletown, PA 17057,
and
JESSICA LYBRAND, in her own right and as Administratrix of the Estate of particular production, Deceased, 9 Birch Street
Middletown, PA 17057

Plaintiffs,

v.

Atglen, PA 19310,

GREENTREE LOGISTICS, INC. 10515 165<sup>TH</sup> Street W. Lakeville, MN 55044, and JACK EDWARD SATTERFIELD, III c/o Dauphin County Prison 501 Mall Rd. Harrisburg, PA 17111, and J.D. ECKMAN, INC. 4781 Lower Valley Rd.

Defendants.

NOTICE

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION LAWYER REFERRAL AND INFORMATION SERVICE One Reading Center Philadelphia, Pennsylvania 19107 Telephone: 215-238-6333 TTY: 215-451-6197 COURT OF COMMON PLEAS PHILADELPHIA COUNTY

\_\_\_\_\_ TERM, 2018

No. \_\_\_\_\_

**Jury Trial Demanded** 

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguien-tes, usted tiene viente (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparesencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandanre y requiere que usted cumpla con todas las provisiones de esta demande. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR RAL SERVCIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELFIA SERVICO DE REFERENCIA E INFORMACION LEGAL One Reading Center Filadelfia, Pennsylvania 19107 Telefone: 215-238-6333 TTY: 215-451-8197

#### <u>CIVIL ACTION – COMPLAINT</u>

#### I. The Parties

- 1. Plaintiff, Jessica Lybrand ("Jessica"), is an adult and citizen of the Commonwealth of Pennsylvania and currently resides at the above-referenced location.
- 2. On October 29, 2018, Plaintiff, Jessica Lybrand was issued Letters of Administration by the Register of Wills of Dauphin County, appointing her as the Administratrix of the Estates of her deceased husband and daughter, Zachary Tyler Lybrand ("Zachary") and respectively. A true and correct copies of the Letters of Administration are attached hereto as Exhibit "A."
- 3. Zachary and were killed on October 12, 2018 in a twelve vehicle accident which was caused by a tractor-trailer driver who was intoxicated, driving with a suspended license, and who failed to recognize traffic that had stopped in his path as described more fully in this Complaint.
- 4. At all times relevant hereto, Plaintiffs, Jessica and Zachary Lybrand were lawfully married, and were the parents of Lybrand who was only sixteen months old at the time of the accident.
- 5. Defendant, Greentree Logistics, Inc. ("Greentree") is a corporation and/or other business entity, organized, operating and existing under the laws of Minnesota, with a principal place of business located at the above-captioned address.
- 6. Defendant, Jack Edward Satterfield, III ("Satterfield"), is an adult individual presently incarcerated at Dauphin County Prison, 501 Mall Rd, Harrisburg, PA 17111.
- 7. At all times relevant hereto, Defendant Satterfield was under contract as a truck driver and/or freight hauler with Defendant Greentree.

- 8. At all times relevant hereto, Defendant Satterfield was an employee and/or actual or apparent agent of Defendant Greentree acting within the course and scope of his employment and agency with Defendant Greentree.
- 9. Defendant, J.D. Eckman, Inc. ("Eckman") is a corporate and/or other business entity, organized, operating, and existing under the laws of the Commonwealth of Pennsylvania with a registered office address and principal place of business located at 4781 Lower Valley Road, Atglen, Pennsylvania 19310.
- 10. At all times relevant hereto, all Defendants regularly and continuously conducted business in the Commonwealth of Pennsylvania, including the City and County of Philadelphia.
- 11. At all times relevant hereto, all Defendants acted individually and/or by and through their duly authorized actual and/or apparent agents, servants, workmen and/or employees, acting within the scope and course of their employment and/or agency with Defendants.
- 12. At all relevant times, all Defendants owed, undertook and/or assumed the duty to use reasonable, proper, adequate, and appropriate care and measures to avoid harm to foreseeable third parties, such as Zachary, and Jessica Lybrand, which duties were breached by Defendants as set forth below.

#### II. The Facts

- 13. Prior to the collision of October 12, 2018 described below, Defendant Satterfield demonstrated a pattern of endangering public safety and violating the motor vehicle laws.
- 14. For example, on the date in question, Defendant Satterfield had an outstanding warrant for his arrest associated with a fare evasion traffic citation on April 14, 2018 in Cumberland County, Pennsylvania.

- 15. Moreover, at the time of the collision described below, Defendant Satterfield did not even have a valid Commercial Driver's License (CDL), as his license had been suspended in connection with his guilty plea to possession of drugs and drug paraphenalia in Mississippi, and it was therefore illegal and constituted a substantial risk to public safety for Defendant Satterfield to operate a commercial vehicle and/or tractor trailer. These facts were known, and/or should have been known by Satterfield's employer, Defendant Greentree, who nonetheless recklessly continued to contract with and/or employ him as a tractor trailer driver on the highways.
- 16. Defendant Greentree knew or should have known of Defendant Satterfield's record of irresponsible behavior, unsafe driving and the suspended status of his CDL before employing or contracting with Defendant Satterfield to haul cargo for Defendant Greentree.
- 17. On October 12, 2018, Defendant Greentree owned a Volvo truck-tractor which was being operated by Defendant Satterfield, northbound on Interstate 83 near Union Deposit Road in Dauphin County, Pennsylvania.
- 18. At the time of the collision, Defendant Satterfield was on dispatch by Defendant Greentree, while under contract with Defendant Greentree and serving as its employee, agent, and/or ostensible agent.
- 19. At the time of the collision, the Volvo truck-tractor was being operated in an unsafe manner and at an excessive rate of speed by Defendant Satterfield.
- 20. Prior to the collision described below, Plaintiff's decedent husband, Zachary, was also operating a motor vehicle northbound on Interstate 83 near Union Deposit Road in Dauphin County, Pennsylvania.
- 21. Zachary had just come from the home he shared with his wife, Jessica, and the couple's 16 month old daughter,

- 22. In addition to marking the day of the horrific events described below, October 12, 2018 was the date of Jessica's 21<sup>st</sup> birthday, and the couple had planned to travel together to Zachary's mother's home to drop off so that they could spend the evening celebrating with friends.
- 23. It was going to be first night away from her parents, and the longest period of time that her mother had ever spent apart from her, as Jessica had not returned to work after giving birth to the couple's first and only child.
- 24. In fact, Jessica and Zachary were concerned that would not be able to sleep at her grandmother's house apart from her parents, so Jessica spent part of the day on October 11, 2018, preparing all of the things that would need to be as comfortable as possible during her first night away from her parents: washing her favorite blankets and pajamas, packing her diaper bag and stuffed animals, and cleaning her pillow, which had also been Zach's childhood pillow.
- 25. During the afternoon of October 12, 2018, Jessica and Zachary ran errands while a friend babysat
- 26. As the afternoon progressed into the evening on October 12, 2018, and Jessica and Zachary returned to their home, it became clear that the couple was running behind schedule.
- 27. In order to allow Jessica to get ready for her birthday celebration, Zachary agreed to take to his mother's house while Jessica remained at the Lybrand home to shower and get dressed.
- 28. As the Lybrand's were preparing for their evening, Defendant Satterfield was consuming double-shot Margaritas and beer in a Mexican restaurant, to the point where

Satterfield was clearly intoxicated as he climbed into his multi-ton tractor trailer and started on this fatal route.

- 29. Around 7:45 p.m., Jessica got the things she had packed for and began placing them in the car as the friend who had been babysitting took and placed her in the rear-facing car seat.
- 30. Jessica then kissed her daughter goodbye and told Zachary she loved him and would see him shortly when he returned from dropping off. As Zachary and pulled out of the family's driveway, this marked the last time Jessica ever saw them alive.
- 31. About 15 minutes later, Zachary was stopped in traffic on northbound I-83 near Union Deposit Road.
- 32. Traffic was at a standstill because Defendant Eckman was performing a \$104.7 million dollar construction project on I-83, and on the evening in question, this Defendant had carelessly, negligently, and recklessly failed to protect drivers with adequate warnings of the alterations they had caused in traffic patterns, and they had created hazards that caused traffic slow and/or stop suddenly and with inadequate warning.
- 33. In fact, since the construction project commenced, the Colonial Park Fire Department that responds to vehicular crashes along this corridor of I-83 has seen an 80% increase in the number accidents that require an emergency response. PennDOT data likewise demonstrates a substantial increase in motor vehicle accidents in this area since the construction project began.
  - 34. The roadway was dry and there were no adverse conditions due to weather.
- 35. At about the same time, and at all relevant times hereto, Defendant Satterfield, acting as an employee, agent, and/or apparent agent of Defendant Greentree in the course and

scope of his employment and agency with Defendant Greentree, was driving the Volvo truck-tractor northbound on I-83 at a high rate of speed, heading directly for the stopped traffic in which Zachary and were sitting helplessly.

- 36. As Defendant Satterfield sped toward Zachary and at an excessive and dangerous rate of speed, his blood-alcohol level was well over the legal limit and constituted a severe danger to the drivers with whom he shared the highway that night.
- 37. As a result of Defendant Satterfield's unsafe speed and excessive blood-alcohol level, he failed to observe or perceive the traffic jam in which Zachary and were stopped, failed to stop, slow down, or take evasive maneuvers, and caused the front of his truck-tractor to strike the rear of Zachary and vehicle.
- 38. The impact of the collision was so violent that it started a chain reaction of impacts involving a total of twelve (12) vehicles which were either stopped or moving slowly.
- 39. Immediately following the impact, Defendant Satterfield exited his cab and fled from the scene, crossing over the southbound lane of traffic on I-83 and running to the parking lot of a nearby hotel where he watched the aftermath of the mayhem he had caused.
- 40. Defendant Satterfield did not call for emergency medical assistance for the victims of the collision, nor did he stop during his flight to check on or render aid to them, including Zachary and
- 41. As a result of the impact, Zachary and vehicle caught fire and became engulfed in flames, with each of them trapped inside the twisted metal frame unable to escape.
- 42. As a result of the impact and subsequent fire, Plaintiff's decedent, Zachary Lybrand, suffered catastrophic and fatal injuries with which he suffered in anguish before expiring due to smoke inhalation and thermal burns.

- 43. As a result of the impact and subsequent fire, Plaintiff's decedent, Lybrand, suffered catastrophic and fatal injuries with which she suffered in anguish before expiring due to smoke inhalation and thermal burns.
- 44. At the time of their deaths, Zachary was 24 years old. was only 16 months old.
- 45. This accident was caused due to the recklessness, negligence, carelessness and intentional misconduct of the Defendant Satterfield as set forth throughout this Complaint.
  - 46. Plaintiffs are entitled to recover punitive damages against Defendant Satterfield.
- 47. This accident was also caused by the reckless indifference and complete disregard for the safety of motorists exhibited by the Defendant Greentree, who disregarded the fact that Satterfield had a suspended license, an outstanding traffic warrant, and a history of unsafe conduct, but nonetheless hired him and placed him behind the wheel of one of their multi-ton tractor trailers and sent him over the course of our highways.
  - 48. Plaintiffs are entitled to recover punitive damages against Defendant Greentree.
- 49. This accident was also caused by the negligence of the Defendant Eckman, who failed to take appropriate measures to protect and safeguard the motorists travelling through the construction zones and hazards that they created as set forth in this Complaint.

## COUNT I – WRONGFUL DEATH ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF ZACHARY LYBRAND v. DEFENDANTS SATTERFIELD AND GREENTREE LOGISTICS

- 50. The paragraphs above are incorporated herein by reference.
- 51. Plaintiffs bring this action as the personal representatives of the Decedent's Estate pursuant to 42 Pa.C.S.A. §8301(d).

- 52. The persons entitled to recover damages for Wrongful Death are as follows:
  - a. Jessica Lybrand, 9 Birch St., Middletown, PA 17057 (spouse)
  - b. Marcia Lybrand, 82R Autumn Lane, Enola PA 17025 (mother)
  - c. Jeffrey Lybrand, 95 Old State Road, Gardners, PA 17324 (father)
- 53. Plaintiffs demand all lawful damages for the wrongful death of Zachary Lybrand for all persons entitled to recover such damages, including damages for medical expenses, expenses of estate administration, the loss of expected pecuniary contributions of the decedent, and the loss of decedent's care, comfort, companionship, society, consortium, guidance and tutelage.
  - 54. Plaintiffs further demand punitive damages against these Defendants.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory and punitive damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit.

## COUNT II – WRONGFUL DEATH ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF LYBRAND v. DEFENDANTS SATTERFIELD AND GREENTREE LOGISTICS

- 55. The paragraphs above are incorporated herein by reference.
- 56. Plaintiffs bring this action as the personal representatives of the Decedent's Estate pursuant to 42 Pa.C.S.A. §8301(d).
  - 57. The persons entitled to recover damages for Wrongful Death are as follows:
    - a. Jessica Lybrand, 9 Birch St., Middletown, PA 17057 (mother)
- 58. Plaintiffs demand all lawful damages for the wrongful death of Lybrand for all persons entitled to recover such damages, including damages for medical expenses,

expenses of estate administration, the loss of expected pecuniary contributions of the decedent, and the loss of decedent's care, comfort, companionship, society, consortium, guidance and tutelage.

59. Plaintiffs further demand punitive damages against these Defendants.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit.

### COUNT III – WRONGFUL DEATH ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF ZACHARY LYBRAND v. DEFENDANT ECKMAN

- 60. The paragraphs above are incorporated herein by reference.
- 61. Plaintiff brings this action as the personal representative of the Decedent's Estate pursuant to 42 Pa.C.S.A. §8301(d).
  - 62. The persons entitled to recover damages for Wrongful Death are as follows:
    - a. Jessica Lybrand, 9 Birch St., Middletown, PA 17057 (spouse)
    - b. Marcia Lybrand, 82R Autumn Lane, Enola PA 17025 (mother)
    - c. Jeffrey Lybrand, 95 Old State Road, Gardners, PA 17324 (father)
- 63. Plaintiffs demand all lawful damages for the wrongful death of Zachary Lybrand for all persons entitled to recover such damages, including damages for medical expenses, expenses of estate administration, the loss of expected pecuniary contributions of the decedent, and the loss of decedent's care, comfort, companionship, society, consortium, guidance and tutelage.

**WHEREFORE**, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration, in compensatory damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit.

### COUNT IV – WRONGFUL DEATH ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF LYBRAND v. DEFENDANT ECKMAN

- 64. The paragraphs above are incorporated herein by reference.
- 65. Plaintiff brings this action as the personal representative of the Decedent's Estate pursuant to 42 Pa.C.S.A. §8301(d).
  - 66. The persons entitled to recover damages for Wrongful Death are as follows:
    - a. Jessica Lybrand, 9 Birch St., Middletown, PA 17057 (mother)
- 67. Plaintiffs demand all lawful damages for the wrongful death of Lybrand for all persons entitled to recover such damages, including damages for medical expenses, expenses of estate administration, the loss of expected pecuniary contributions of the decedent, and the loss of decedent's care, comfort, companionship, society, consortium, guidance and tutelage.

**WHEREFORE**, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration, in compensatory damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit.

## COUNT V – SURVIVAL ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF ZACHARY LYBRAND v. DEFENDANTS SATTERFIELD AND GREENTREE LOGISTICS

- 68. The paragraphs above are incorporated herein by reference.
- 69. Plaintiff brings this action on behalf of the Estate of Zachary Lybrand pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, and claims on behalf of the Estate all damages recoverable by law, including but not limited to damages for Decedent's pain and suffering, loss of earnings and loss of future earning capacity.

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70. Plaintiff also seeks, and is entitled to recover, punitive damages against these Defendants.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory and punitive damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit

## COUNT VI – SURVIVAL ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF LYBRAND v. DEFENDANTS SATTERFIELD AND GREENTREE LOGISTICS

- 71. The paragraphs above are incorporated herein by reference.
- 72. The paragraphs above are incorporated herein by reference.
- 73. Plaintiff brings this action on behalf of the Estate of Lybrand pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, and claims on behalf of the Estate all damages recoverable by law, including but not limited to damages for Decedent's pain and suffering, loss of earnings and loss of future earning capacity.
- 74. Plaintiff also seeks, and is entitled to recover, punitive damages against these Defendants.

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, and claims of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory and punitive damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit

### COUNT VII – SURVIVAL ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF ZACHARY LYBRAND v. DEFENDANT ECKMANN

75. The paragraphs above are incorporated herein by reference.

76. Plaintiff brings this action on behalf of the Estate of Zachary Lybrand pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, and claims on behalf of the Estate all damages recoverable by law, including but not limited to damages for Decedent's pain and suffering, loss of earnings and loss of future earning capacity.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, and claim of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit

### COUNT VIII – SURVIVAL ACTION PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF LYBRAND v. DEFENDANTS SATTERFIELD AND GREENTREE LOGISTICS

- 77. The paragraphs above are incorporated herein by reference.
- 78. Plaintiff brings this action on behalf of the Estate of Lybrand pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, and claims on behalf of the Estate all damages recoverable by law, including but not limited to damages for Decedent's pain and suffering, loss of earnings and loss of future earning capacity.
- 79. Plaintiff also seeks, and is entitled to recover, punitive damages against these Defendants.

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, and claims of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory and punitive damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit.

**COUNT IX – SURVIVAL ACTION** 

PLAINTIFF, JESSICA LYBRAND, INDIVIDUALLY AND AS ADMINISTRATRIX OF

THE ESTATE OF

LYBRAND v. DEFENDANT ECKMANN

80. The paragraphs above are incorporated herein by reference.

81. Plaintiff brings this action on behalf of the Estate of Lybrand pursuant to

the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, and claims on behalf of the Estate all

damages recoverable by law, including but not limited to damages for Decedent's pain and

suffering, loss of earnings and loss of future earning capacity.

WHEREFORE, Plaintiff demands judgment in her favor and against Defendants, and

claim of Defendants a sum in excess of the jurisdictional limit for arbitration in compensatory

damages, with lawful interest thereon, damages pursuant to Rule 238, and costs of suit

FELDMAN SHEPHERD WOHLGELERNTER

TANNER WEINSTOCK & DODIG, LLP

/s/ Mark W. Tanner

MARK W. TANNER

JAMES P. FAUNES

Attorneys for Plaintiff

Date: October 31, 2018

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#### **VERIFICATION**

Mark W. Tanner, Esquire, verifies that he is an attorney for plaintiff, that he is authorized to take this Verification on behalf of the plaintiff; that he is the person who has knowledge of the facts set forth in the foregoing pleading, and that the facts are true and correct to the best of his knowledge, information and belief. He further understands that false statements herein are made subject to the penalties of 18 Pa. C. S. Section 4904, relating to unsworn falsification to authorities.

MARK W. TANNER

# Exhibit "A"

### Dauphin County, Pennsylvania – Register of Wills SHORT CERTIFICATE – LETTERS OF ADMINISTRATION

File No.: 2218-0960



I, **Jean Marfizo King**, Register of Wills in and for the County of Dauphin, in the Commonwealth of Pennsylvania, DO HEREBY CERTIFY that on October 29, 2018, LETTERS OF ADMINISTRATION, on the estate of ZACHARY LYBRAND, AKA ZACHARY T. LYBRAND, deceased, of LONDONDERRY TOWNSHIP in said county, were granted to JESSICA E. LYBRAND, having first been qualified well and truly to administer the same. And, I further certify that no revocation of said Letters appears of record in my office.

IN TESTIMONY WHEREOF, I have here unto set my hand and affixed the seal of said office at DAUPHIN COUNTY, PENNSYLVANIA, on October 29, 2018.

Date of Death: October 12, 2018

Social Security #:

Jean Marfyr King

NOT VALID WITHOUT OFFICIAL SIGNATURE AND SEAL OF OFFICE
EXPIRES 60 DAYS FROM DATE OF ISSUANCE

### Dauphin County, Pennsylvania – Register of Wills SHORT CERTIFICATE – LETTERS OF ADMINISTRATION

File No.: 2218-0961



I, Jean Marfizo King, Register of Wills in and for the County of Dauphin, in the Commonwealth of Pennsylvania, DO HEREBY CERTIFY that on October 29, 2018, LETTERS OF ADMINISTRATION, on the estate of LYBRAND AKA LYBRAND, deceased, of LONDONDERRY TOWNSHIP in said county, were granted to JESSICA E. LYBRAND, having first been qualified well and truly to administer the same. And, I further certify that no revocation of said Letters appears of record in my office.

IN TESTIMONY WHEREOF, I have here unto set my hand and affixed the seal of said office at DAUPHIN COUNTY, PENNSYLVANIA, on October 29, 2018.

Date of Death: October 12, 2018

Social Security #:

Jean Marfyr King
Register of Yolls & King

NOT VALID WITHOUT OFFICIAL SIGNATURE AND SEAL OF OFFICE
EXPIRES 60 DAYS FROM DATE OF ISSUANCE