

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LORETTA LOPEZ, as Administratrix of
the ESTATE OF VALLIA VALENE
KARAHARISIS,

Plaintiff,

v.

BUCKS COUNTY, *et al.*,
Defendants.

Civil No. 2:15-cv-05059-JS

MOTION TO INTERVENE AND UNSEAL

The *Bucks County Courier Times*¹ hereby moves to intervene in this matter for the limited purpose of seeking an order unsealing the following settlement record and any related records: Petition by Loretta Lopez, filed under seal December 1, 2016 (*see* Dkt. No. 78) and Order Signed by Honorable Jaun R. Sanchez, filed under seal December 1, 2016 (*see* Dkt. No. 79). In support of its motion, the *Bucks County Courier Times* relies on the accompanying Memorandum of Law.

WHEREFORE the *Bucks County Courier Times* respectfully requests that this Court grant the motion to intervene and enter an order unsealing the aforementioned sealed materials.

Date: September 12, 2024.

/s/Paula Knudsen Burke

¹ The corporate entity which publishes the *Bucks County Courier Times* is GateHouse Media Pennsylvania Holdings, Inc. d/b/a the *Bucks County Courier Times*.

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[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of the *Bucks Country Courier Times*' Motion to Intervene and Unseal, and for good cause shown, it is ORDERED as follows:

1. The Motion is GRANTED.
2. The *Bucks Country Courier Times* is permitted to intervene.
3. The Court hereby Orders that access shall be granted and the following docket entries unsealed: Petition by Loretta Lopez, filed under seal December 1, 2016 (Dkt. No. 78) and Order Signed by Honorable Jaun R. Sanchez, filed under seal December 1, 2016 (Dkt. No. 79).
4. The Clerk is directed to redact the names of any minors referenced in Dkt. Nos. 78 and 79.

Judge, United States District Court

CERTIFICATE OF COMPLIANCE PURSUANT TO LOCAL RULE. 7.1

I hereby certify that pursuant to Local Rule 7.1, I sought concurrence from counsel for each of the parties to this action to determine their concurrence or nonconcurrence in the instant Motion to Intervene and Unseal. This motion is not certified as uncontested. Specifically, the following counsel take these positions on the motion:

The following counsel do not concur in the motion:

- John R. Ninosky, counsel for PrimeCare Medical, Inc.

The following counsel take no position on the motion:

- Jeffrey Scott, counsel for Bucks County
- Jonathan Feinberg, counsel for Ms. Karaharisis's Estate.

Dated: September 12, 2024

/s/ Paula Knudsen Burke

Paula Knudsen Burke

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served the above Motion to Intervene and Unseal via the District Court's Electronic Filing System and via electronic mail on September 12, 2024, to counsel of record as follows:

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Dated: September 12, 2024

/s/ Paula Knudsen Burke

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