

Docket Number: 4264

INNOVATIVE EMERGENCY MANAGEMENT, INC.

Anthony S. Potter, Esquire
Jeffrey C. Bright, Esquire
Franklin C. Miller, Jr., Esquire

VS.

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA HOUSING FINANCE AGENCY**

~~Rebecca L. Peace, Chief Counsel~~
Gerard N. Mangieri, Esquire
David L. Narkiewicz, Esquire
Leonidas Pandeladis, Esquire

January 23, 2024

Plaintiff filed Statement of Claim, proof of mailing and filing fee. Amount of Claim: \$4,047,847.20+.

January 24, 2024

Board issued Acknowledgment letter requesting response from Defendant and forwarding a copy of the Statement of Claim to Attorney General.

February 16, 2024

Attorney General filed acknowledgment of claim form. Receipt of same acknowledged February 6, 2024.

February 22, 2024

Defendant filed Praecipe to Enter Appearances of Gerard N. Mangieri, Esquire, David L. Narkiewicz, Esquire and Leonidas Pandeladis, Esquire on behalf of Defendant.

February 29, 2024

Defendant filed answer and new matter to statement of claim and counterclaim.

March 5, 2024

Board issued Acknowledgment letter requesting a response from Plaintiff and forwarding a copy of the answer and new matter to claim and counterclaim to Attorney General.

February 16, 2024

Attorney General filed acknowledgment of Answer and New Matter to Claim and Counterclaim form. Receipt of same acknowledged March 12, 2024.

March 20, 2024

Plaintiff filed Preliminary Objections to Counterclaim and Brief in Support.

March 22, 2024

Board forwarded letter to Defendant, with copy to Plaintiff, advising of rules for filing response.

April 22, 2024

Defendant filed Answer to Preliminary Objections to Counterclaim and Brief in Opposition.

May 22, 2024

Plaintiff filed Reply Brief in Support of Preliminary Objections.

May 24, 2024

Plaintiff filed Praecipe for Argument List.

June 12, 2024

Board rendered Opinion and Order. Order as follows: **"AND NOW**, this 12th day of June, 2024, upon consideration of the counterclaim filed by the Pennsylvania Housing Finance Agency (PHFA) on February 29, 2024, the preliminary objections and brief in support of the preliminary objections filed by Innovative Emergency Management, Inc. (IEM) on March 20, 2024, the answer to the preliminary objections and brief in opposition to the preliminary objections filed by PHFA on April 22, 2024, the reply brief filed by IEM on May 22, 2024, and the praecipe for argument filed by IEM on May 24, 2024, it is hereby **ORDERED** and **DECREED** as follows: 1. The Board finds no need for oral argument and will not list the preliminary objections for argument. 2. IEM's preliminary objection Count I pursuant to Pa. R.C.P. 1028(a)(1) is **OVERRULED**. 3. IEM's preliminary objection Count II pursuant to Pa. R.C.P. 1028(a)(4) is **OVERRULED**. 4. IEM shall have thirty (30) days from the date of service of this order to file an answer to PHFA's new matter and counterclaim." Copy forwarded to all parties of record.

June 17, 2024

Plaintiff filed acceptance of service of Opinion and Order dated June 12, 2024. Receipt of same acknowledged June 13, 2024.

June 20, 2024

Defendant filed acceptance of service of Opinion and Order dated June 12, 2024. Receipt of same acknowledged June 13, 2024.

July 10, 2024

Plaintiff filed its answer to Defendant's new matter and counterclaim.

July 10, 2024

Board forwarded letter to parties directing parties to commence with discovery.

July 19, 2024

Defendant filed a Motion to Compel Production of Documents.

July 24, 2024

Board forwarded letter to Plaintiff requesting response to Defendant's Motion to Compel.

July 26, 2024

Defendant filed Brief in Support of Motion to Compel Production of Documents.

August 22, 2024

Plaintiff Response in Opposition to Defendant's Motion to Compel Production of Documents, Brief in Support and Proposed Order.

October 18, 2024

Defendant transmitted via facsimile a letter requesting an informal discovery conference.

October 25, 2024

Board forwarded letter to parties scheduling a conference for Wednesday, October 30, 2024 at 200 North Third Street, Suite 700, Harrisburg, Pennsylvania at 2:00 p.m.

October 25, 2024

Defendant filed via U.S. mail a letter requesting an informal discovery conference.

October 30, 2024

Board held conference.

May 14, 2025

Board rendered an Order. Order as follows: "**AND NOW**, this 14th day of May, 2025, following informal conferences with the Board and upon entry by the parties of a Stipulation Regarding Production of Electronically Stored Information and a Stipulated Confidentiality Agreement, it appears that Respondent's July 19, 2024, Motion to Compel Production of Documents is moot. Therefore, it is hereby **ORDERED** that said Motion to Compel is **DISMISSED**." Copy forwarded to Plaintiff and Defendant.

May 14, 2025

Board issued the Stipulated Confidentiality Agreement filed by the parties as an Order of the Board.

May 21, 2025

Defendant filed acceptance of service of order dated May 14, 2025. Receipt of same acknowledged May 20, 2025.

May 21, 2025

Defendant filed acceptance of service of order dated May 14, 2025. Receipt of same acknowledged May 20, 2025.

May 23, 2025

Plaintiff filed acceptance of service of order dated May 14, 2025.
Receipt of same acknowledged May 19, 2025.

May 23, 2025

Plaintiff filed acceptance of service of order dated May 14, 2025.
Receipt of same acknowledged May 19, 2025.
