

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION

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2014 APR 17 AM 11:11

VERONICA WAGNER COVATCH,
et al.,

Plaintiffs,

v.

CENTRAL OHIO SHELTYE RESCUE,
Inc., et al.,

Defendants.


Case No. 2014-CVF-024571 YACK

JUDGE O'GRADY

NOTICE OF SUBSTITUTION
OF EXHIBITS TO PLAINTIFFS'
MEMORANDUM CONTRA MOTION
FOR PROTECTIVE ORDER

Now come plaintiffs, by and through counsel, and hereby give notice of substitution of the original Affidavits of Veronica Covatch, Michelle Wilson, Jolien Caparro, and Miriam Brueggeman attached hereto for the copies of said affidavits which were attached to Plaintiffs' Memorandum Contra Motion for Protective Order previously filed in this case.

Respectfully submitted,



James H. Banks 0031958
Counsel for Plaintiffs
P.O. Box 40
Dublin, Ohio 43017
Tel. (614) 866-0666
Fax. (614) 389-3880

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was duly served upon John A. Bell, Esq., P.O. Box 091022, Bexley, Ohio 43209 and Scott O. Sheets, Assistant Prosecuting Attorney, 373 South High Street, 13th Floor, Columbus, Ohio 43215, personally and/or via ordinary U.S. Mail, postage prepaid, this 17th day of April, 2015.


James H. Banks, Esq.

EXHIBIT C

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION

VERONICA WAGNER COVATCH,
et al.,

Plaintiffs,

Case No. 2014-CVF-024571

v.

JUDGE JAMES O'GRADY

CENTRAL OHIO SHELTYE RESCUE,
INC., et al.,

AFFIDAVIT OF PLAINTIFF
VERONICA COVATCH

Defendants.

STATE OF PENNSYLVANIA)
COUNTY OF JEFFERSON)SS:

Now comes affiant, Veronica Wagner Covatch, being first
duly sworn according to law and deposes and states the foregoing
to be true based upon her personal knowledge:

1. I a resident of Punxsutawney, Pennsylvania, one of the
plaintiffs in the above-captioned case, and am competent to give
this affidavit;
2. I have not engaged in any type of campaign to harass or
bully any of the defendants in this case, including but not
limited to defendant Penny Sanderbeck;
3. I have made no harassing telephone calls to Ms. Sanderbeck
nor was I in any way involved in the alleged burglary of her
home;
4. I have not posted any pleadings or other documents
concerning this action on the internet;

5. I have not directed nor instructed any person to harass or bully any of the defendants in this case, nor to make telephone calls, nor to burglarize Penny Sanderbeck's home, nor to put any pleadings or documents on the internet;

6. Rather, when I saw negative comments I responded by being supportive of the work of rescues in general and made the same type of responses I did in those attached hereto;

6. Because the false, inflammatory and derogatory statements posted by defendants Penny Sanderbeck, Central Ohio Sheltie Rescue, Facebook page "Keep Piper Safe" and/or persons on their behalves are highly upsetting to me, I have blocked all such internet information from my accounts and have not reviewed online posts concerning this case for many months;

7. I am not nor have I ever been the administrator of Facebook page "Piper Bring Me Home" or "Bring Piper Home" except for a few day period when I was given permission to delete negative posts, and except for the fact that I did request that Joliene Caparro, the administrator of "Piper Bring Me Home", remove the page;

8. With the foregoing exceptions, I have/had no control over any of the content contained in these pages and have blocked these pages from my accounts.

Further, affiant sayeth naught.

Veronica Covatch
Veronica Covatch, Affiant

Sworn to and subscribed before me this 30 day of
March, 2015.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Rodney R. Shields, Notary Public
Brookville Boro, Jefferson County
My Commission Expires Sept. 12, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Rodney R. Shields
NOTARY PUBLIC

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION

VERONICA WAGNER COVATCH,
et al.,

Plaintiffs,

Case No. 2014-CVF-024571

v.

JUDGE JAMES O'GRADY

CENTRAL OHIO SHELTYE RESCUE,
INC., et al.,

AFFIDAVIT OF PLAINTIFF
MICHELLE WILSON

Defendants.

STATE OF OHIO)
COUNTY OF HURON) SS:

Now comes affiant, Michelle Wilson, being first duly sworn according to law and deposes and states the foregoing to be true based upon her personal knowledge:

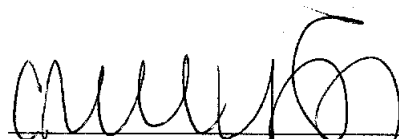
1. I am a resident of Norwalk, Ohio, one of the plaintiffs in the above-captioned case, and am competent to give this affidavit;
2. I have not engaged in any type of campaign to harass or bully any of the defendants in this case, including but not limited to defendant Penny Sanderbeck;
3. I have made no harassing telephone calls to Ms. Sanderbeck nor was I in any way involved in the alleged burglary of her home;
4. I have not posted any pleadings or other documents concerning this action on the internet; rather, oftentimes I saw the documents and pleadings online before I even received a copy from my attorney;

5. I have not directed nor instructed any person to harass or bully any of the defendants in this case, nor to make telephone calls, nor to burglarize Penny Sanderbeck's home, nor to put any pleadings or documents on the internet;

6. Because the false, inflammatory and derogatory statements posted by defendants Penny Sanderbeck, Central Ohio Sheltie Rescue and/or persons on their behalves are highly upsetting to me, I do not read them and do not reply or engage in the postings;

7. I am not nor have I ever been the administrator of Facebook page "Piper Bring Me Home" or "Bring Piper Home" and have no control over any of the content contained in these pages.

Further, affiant sayeth naught.


Michelle Wilson, Affiant

Sworn to and subscribed before me this 31st day of March, 2015.

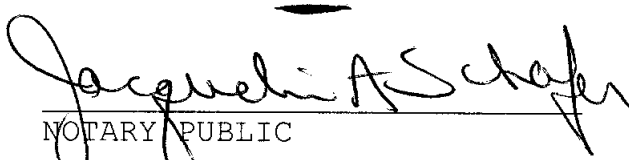

NOTARY PUBLIC

EXHIBIT E

STATE OF Pennsylvania)

) SS:

COUNTY OF Luzerne)

Now comes affiant, Jolien Caparro, being first duly sworn according to law and deposes and states the foregoing to be true based upon her personal knowledge:

I am a resident of Duquesne, Pennsylvania and am competent to give this affidavit.

I was the administrator of Facebook page "Piper Bring Me Home".

In December, 2014 Veronica Covatch contacted me and requested that I delete the page because it contained too many negative comments. I removed the Facebook page at Veronica Covatch's request in December 2014

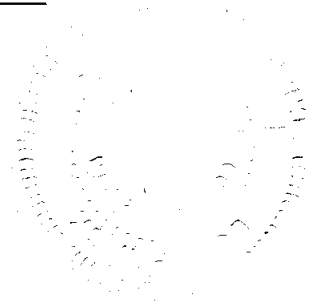
Further, affiant sayeth naught.

Jolien Caparro
Jolien Caparro, Affiant

Sworn to and subscribed before me this 30 day of March, 2015.

Lori Frask
NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
LORI FRASK, Notary Public
Conyngham Boro., Luzerne County
My Commission Expires November 29, 2016



STATE OF Texas)

) SS:

COUNTY OF McLennan)

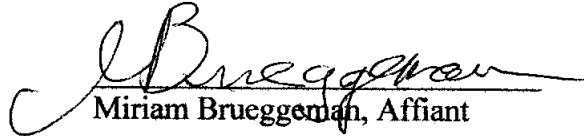
Now comes affiant, Miriam Brueggeman, being first duly sworn according to law and deposes and states the foregoing to be true based upon her personal knowledge:

I am a resident of Moody, Texas and am competent to give this affidavit.

I am the administrator of Facebook page "Bring Piper Home".

Veronica Covatch asked to be added for a very short period of time to the page so she could go through the comments and clean them up. I added her, as that is/was always our goal, keep it clean and honest. Veronica Covatch is not currently an administrator of this page; her tenure was very brief.

Further, affiant sayeth naught.


Miriam Brueggeman, Affiant

Sworn to and subscribed before me this 31 day of March, 2015.


NOTARY PUBLIC

208 HEWITT DR. #103, WACO, TX 76712
254.666.1034

