

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
SUMMARY APPEALS BRANCH

COMMONWEALTH OF PENNSYLVANIA,

No. SA 23-552

Plaintiff,

v.

PENNSYLVANIA STATE CONSTABULARY,

Defendant.

**DEFENDANT'S MOTION TO  
ENFORCE THE AUTOMATIC  
SUPERSEDEAS AND FOR  
SANCTIONS**

**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 Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Roy E. Leonard  
Roy E. Leonard, Esquire

Filed on behalf of the Pennsylvania State Constabulary

Counsel of Record for This Party:

Roy E. Leonard, Esq.  
PA ID No. 54782  
rleonard@leonardfirm.com

LEONARD, PLLC  
105 Market St., Suite 300  
Pittsburgh, PA 15222  
(412) 448-2868

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
SUMMARY APPEALS BRANCH

COMMONWEALTH OF PENNSYLVANIA,                      No. SA 23-552

Plaintiff,

v.

PENNSYLVANIA STATE CONSTABULARY,

Defendant.

**DEFENDANT’S MOTION TO ENFORCE THE AUTOMATIC SUPERSEDEAS  
AND FOR SANCTIONS**

Defendant, Pennsylvania State Constabulary, by its counsel, Roy E. Leonard and the law firm of LEONARD, PLLC, files this Motion to Enforce the Automatic Supersedeas and for Sanctions, averring in support hereof as follows:

1. Defendant is a domestic nonprofit corporation as defined in the Pennsylvania Nonprofit Corporation Act of 1988, as amended.
2. Defendant is the *bona fide* owner of a certain 2018 Ford Police Interceptor having title number 78865259 (the “**Defendant’s Vehicle**”).
3. On August 11, 2022, Defendant was issued Pennsylvania registration plate number MG3590N (the “**Registration Plate**”) for Defendant’s Vehicle.
4. On September 11, 2023, the Pennsylvania Department of Transportation (“**PennDOT**”) notified Defendant that the Registration Plate was **suspended** effective September 26, 2023 pursuant to 75 Pa.C.S.A. § 1373(b)(2) on the basis that the Registration Plate was issued for Defendant’s Vehicle without payment of the required fees because the “Pennsylvania State

Constabulary is not a government or quasi government entity (i.e., political subdivision or municipal authority) and is not eligible for the exemption information that was claimed. You are not eligible for the Municipal Government (MG) registration plate.” See letter from PennDOT to Defendant, dated September 11, 2023 (the “**Official Notice of Suspension**”), which is attached hereto as **Exhibit A**.

5. The Official Notice of Suspension further provides that Defendant has the right to appeal this action to the Court of Common Pleas (Civil Division) within 30 days of the date of the Official Notice of Suspension Letter. *Id.*

6. On October 6, 2023, Defendant timely appealed the Official Notice of Suspension by filing a Petition for Appeal from Order of Secretary of Transportation Suspending Registration Plate Number (“**Petition for Appeal**”), which is attached hereto as **Exhibit B**.

7. The Vehicle Code expressly provides for an automatic *supersedeas* in certain circumstances, upon filing a timely appeal, such as if PennDOT **suspends** a vehicle owner’s registration. Pursuant to 75 Pa.C.S.A. § 1377: “[a]ny person who has been sanctioned by the department under this chapter or whose registration...has been denied, **suspended** or otherwise sanctioned by the department shall have the right to appeal to the court vested with jurisdiction of such appeals by or pursuant to Title 42 (relating to judiciary and judicial procedure). **The filing of the appeal shall act as a supersedeas, except for a warning or a revocation, and the suspension or monetary penalty shall not be imposed until determination of the matter as provided in this section” (emphasis added). See **Exhibit C**, attached.**

8. No such determination has been made by this Court on the Petition for Appeal, inasmuch as the case is scheduled for a statutory appeal hearing on **May 30, 2024**.

9. Thus, Defendant's filing of the Petition for Appeal has acted as a *supersedeas* since **October 6, 2023**, staying the suspension of the Registration Plate, and any enforcement thereof, pending a judicial determination on the Petition for Appeal.

10. Jason C. Knapp is the constable in and for the Second Ward of the City of Pittsburgh, Allegheny County, Pennsylvania and is certified by the Pennsylvania Commission on Crime and Delinquency pursuant to 44 Pa. C.S.A. § 7142 ("**Constable Knapp**").

11. Constable Knapp is an employee of Defendant and, through the scope of his employment, the operator of Defendant's Vehicle.

12. On March 5, 2024, while Constable Knapp was preparing to serve warrants with another certified constable, officers from Castle Shannon and Bethel Park Police Departments stopped Defendant's Vehicle and detained Constable Knapp. Constable Knapp was advised by Castle Shannon Officer Janeda that the officers involved with the traffic stop were acting on behalf of Pennsylvania State Police ("**PSP**") Moon Township Barracks who stated that the Registration Plate needed seized. Upon information and belief, the officer acting or purporting to act on behalf of PSP was Trooper Timothy R. Gordon, Jr. ("**Trooper Gordon**").

13. During the traffic stop, Constable Knapp requested that the Registration Plate not be seized since suspension of the Registration Plate was a matter under statutory appeal before this Court and, furthermore, provided the officers with a true and correct copy of the Petition for Appeal, together with the motion for postponement continuing the hearing until March 14, 2024, which evidenced both the *supersedeas* and continuation thereof, respectively. Nevertheless, following calls between officers and Trooper Gordon during the traffic stop, and despite continued protest by Constable Knapp, the Registration Plate was eventually seized, and Constable Knapp was forced to tow Defendant's Vehicle back to Constable Knapp's office in downtown Pittsburgh.

14. Constable Knapp acknowledged that Castle Shannon Police Department had seized the Registration Plate from Defendant's Vehicle by signing an Acknowledgment of Seized Vehicle Registration, which is attached hereto as **Exhibit D**.

15. Defendant's Vehicle remains unavailable for use by Defendant and Constable Knapp.

16. On March 14, 2024, the undersigned Counsel for Defendant sent an email to Meron Eshete Murphy, Assistant Counsel for Plaintiff, following a telephone conversation, confirming that Plaintiff knew that the Registration Plate was seized by Castle Shannon Borough Police Department on March 5, 2024 and informing Attorney Murphy that the Registration Plate had been seized unlawfully by virtue of the *supersedeas* in effect as a result of the Petition for Appeal. *See Exhibit E*. In response, Counsel for Plaintiff invited the filing of this motion. *Id.*

17. Upon information and belief, Plaintiff, through PennDOT and/or PSP and/or officials acting or purporting to act on their behalf, initiated, authorized, and/or directed the seizure of the Registration Plate in violation of the *supersedeas*.

18. As a direct result of Plaintiff's initiating, authorizing, and/or directing the seizure of the Registration Plate, Defendant has incurred and will continue to incur substantial damages including, but not limited to, vehicle towing charges in the amount of \$169.45 and attorney's fees to be determined, and work-related income losses in excess of \$813.00.

19. On April 3, 2024, Trooper Gordon issued citations to Constable Knapp arising out of the March 5<sup>th</sup> incident mentioned above alleging that, *inter alia*, Constable Knapp operated Defendant's Vehicle in violation of 75 Pa.C.S.A. § 1301(a) (relating to driving an unregistered vehicle). *See Exhibit F*.

WHEREFORE, Defendant Pennsylvania State Constabulary respectfully requests that this Honorable Court enter an Order:

1. Requiring Plaintiff Commonwealth of Pennsylvania to return the Registration Plate to Defendant Pennsylvania State Constabulary within the next five (5) business days and refrain from seizing and otherwise directing the seizure of such Registration Plate from Defendant unless and until this Court issues an order requiring the return of such Registration Plate to Plaintiff;
2. Awarding Defendant Pennsylvania State Constabulary the amount of \$982.45, and attorney's fees to be determined, as a direct result of damages that Defendant has incurred as a direct result of the improper seizure of the Registration Plate; and
3. Such other and further relief as this Court deems appropriate.

A proposed Order is attached hereto.

Dated: April 15, 2024

LEONARD, PLLC

/s/Roy E. Leonard

Roy E. Leonard, Esquire

PA ID No. 54782

105 Market St., Suite 300

Pittsburgh, PA 15222

Telephone: (412) 448-2868

Facsimile: (412) 448-2860

Email: rleonard@leonardfirm.com

Counsel for the Pennsylvania State  
Constabulary

# EXHIBIT A



September 11, 2023

PENNSYLVANIA STATE  
CONSTABULARY  
320 FORT DUQUESNE BLVD  
STE 235 PO BOX 22070  
PITTSBURGH PA 15222

To Whom it May Concern:

This letter is regarding your Pennsylvania registration plate number MG3590N, which was issued in error as registration covering your 2018 Ford, title number 78865259.

Section 1373(b) of the Vehicle Code provides that:

The department may suspend a registration without providing an opportunity for a hearing in any of the following cases:

- (1) Upon the request or order of any court of record.
- (2) The required fees have not been paid.
- (3) An out-of-service order has been issued for the vehicle, the owner or the operator by the department or by the United States Department of Transportation.
- (4) The vehicle is being operated in violation of section 4704(b)(1) (relating to inspection by police or Commonwealth personnel).

More specifically, the above referenced registration was issued to your vehicle without payment of the required fees because Pennsylvania State Constabulary is not a government or quasi-government entity (i.e., political subdivision or municipal authority) and is not eligible for the exemption information that was claimed. You are not eligible for the Municipal Government (MG) registration plate.

Accordingly, the registration plate referenced above is suspended indefinitely as authorized by Section 1373(b)(2) of the Vehicle Code. The suspension is effective 15 days from the date of this letter.

This is an Official Notice of Suspension. You have a right to appeal this action to the Court of Common Pleas (Civil Division) within 30 days of the date of this letter. If you file an appeal in the Court of Common Pleas, the Court will give you a time stamped certified copy of the appeal. In order for your appeal to be valid, you must send the time stamped certified copy of the appeal by certified mail to:



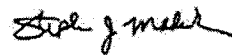
Insert Name  
Page 2  
Insert Date

Pennsylvania Department of Transportation  
Office of Chief Counsel  
1101 South Front Street, Third Floor  
Harrisburg, PA 17104-2516

You are required to return registration plate number MG3590N to the Department. A self-addressed envelope is enclosed to assist you with the return of the registration plate. In addition, you must submit a new application using form MV-140, request for registration, and submit with the applicable fees. When the MG3590N registration plate and request for registration application with fees is received by the Department, you will receive a new standard issue registration for your vehicle.

For additional information, you must contact Joshua Kline of the Research and Support Operations Section at 717-705-0796.

Sincerely,



Stephen J. Madrak,  
Director of Motor Vehicles

# EXHIBIT B

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA

CIVIL DIVISION, ARBITRATION AND STATUTORY APPEALS ONLY

vs.

CASE NUMBER: SA-23-552

Pennsylvania State Constabulary

TYPE OF PLEADING:

OPERATOR'S LICENSE SUSPENSION

REGISTRATION PLATE SUSPENSION

Defendants,

CODE AND CLASSIFICATION: 306

FILED ON BEHALF OF:

Pennsylvania State Constabulary

(Name of party - indicate Plaintiff or Defendant)

NAME, ADDRESS AND TELEPHONE OF:

- Council of Record
Individual, if Pro Se

114819
6 October 2023
12:14:00
SA-23-000562

Pennsylvania State Constabulary
320 Fort Duquesne Blvd Ste 235
Pittsburgh PA 15222-1107
(412) 930-0370
agency@stateconstablepa.us

THIS CASE WILL BE HEARD HEARING DATE 1.4.24

[Handwritten signature]

TIME: 8:15 A.M.

PLACE: CITY-COUNTY BLDG.

8TH FLOOR, ROOM 21 414 GRANT STREET

(412) 350-6823

Attorney's State ID #

Attorney's Firm ID #

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA

vs.

Statutory Appeal Docket

Pennsylvania State Constabulary  
Defendant

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

PETITION FOR APPEAL FROM ORDER OF SECRETARY OF TRANSPORTATION SUSPENDING OPERATOR'S LICENSE/REGISTRATION PLATE NUMBER.

TO THE HONORABLE JUDGES OF SAID COURT:

1. Petitioner is ✓ Pennsylvania State Constabulary an individual residing at 320 Fort Duquesne Blvd Ste 235 P. Htsburgh PA 15222

2A. On or about \_\_\_\_\_, 20\_\_\_\_, petitioner received a notice from the PA Dept. of Transportation notifying him/her that his/her operator's license, bearing card number \_\_\_\_\_ was being suspended as of \_\_\_\_\_, 20\_\_\_\_ by reason of violation of Vehicle Code \_\_\_\_\_ or \_\_\_\_\_ (STRIKE OUT THE INAPPLICABLE CLAUSE 2A OF 2B)

2B. On or about September 11, 2023, petitioner received a notice from the PA Department of Transportation notifying him/her present registration plate number MG3590N was being suspended as of Sept 26, 2023 by reason of Section ~~1373~~ 1373(b)

A copy of said notice is attached hereto and marked Exhibit "A"

3. Petitioner respectfully prays that this appeal be allowed under Section 1550 of the Vehicle Code: that a hearing date be granted de novo to determine whether petitioner is subject to suspension of his/her license or registration plate number and this appeal act as a supersedeas pending said hearing.

✓ Pennsylvania State Constabulary depose and say that the averments of the facts contained in the within appeal are true and correct to the best of my knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME

this 6<sup>th</sup> day of OCT 2023  
by Michael McPeck, Director  
PS, Clerk



September 11, 2023

PENNSYLVANIA STATE  
CONSTABULARY  
320 FORT DUQUESNE BLVD  
STE 235 PO BOX 22070  
PITTSBURGH PA 15222

To Whom it May Concern:

This letter is regarding your Pennsylvania registration plate number MG3590N, which was issued in error as registration covering your 2018 Ford, title number 78865259.

Section 1373(b) of the Vehicle Code provides that:

The department may suspend a registration without providing an opportunity for a hearing in any of the following cases:

- (1) Upon the request or order of any court of record.
- (2) The required fees have not been paid.
- (3) An out-of-service order has been issued for the vehicle, the owner or the operator by the department or by the United States Department of Transportation.
- (4) The vehicle is being operated in violation of section 4704(b)(1) (relating to inspection by police or Commonwealth personnel).

More specifically, the above referenced registration was issued to your vehicle without payment of the required fees because Pennsylvania State Constabulary is not a government or quasi-government entity (i.e., political subdivision or municipal authority) and is not eligible for the exemption information that was claimed. You are not eligible for the Municipal Government (MG) registration plate.

Accordingly, the registration plate referenced above is suspended indefinitely as authorized by Section 1373(b)(2) of the Vehicle Code. The suspension is effective 15 days from the date of this letter.

This is an Official Notice of Suspension. You have a right to appeal this action to the Court of Common Pleas (Civil Division) within 30 days of the date of this letter. If you file an appeal in the Court of Common Pleas, the Court will give you a time stamped certified copy of the appeal. In order for your appeal to be valid, you must send the time stamped certified copy of the appeal by certified mail to:

Insert Name

Page 2

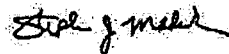
Insert Date

Pennsylvania Department of Transportation  
Office of Chief Counsel  
1101 South Front Street, Third Floor  
Harrisburg, PA 17104-2516

You are required to return registration plate number MG3590N to the Department. A self-addressed envelope is enclosed to assist you with the return of the registration plate. In addition, you must submit a new application using form MV-140, request for registration, and submit with the applicable fees. When the MG3590N registration plate and request for registration application with fees is received by the Department, you will receive a new standard issue registration for your vehicle.

For additional information, you must contact Joshua Kline of the Research and Support Operations Section at 717-705-0796.

Sincerely,



Stephen J. Madrak,  
Director of Motor Vehicles

# EXHIBIT C

# 75 Pa. C.S. § 1377

Section 1377 - Judicial review

**(a) General rule.**--Any person who has been sanctioned by the department under this chapter or whose registration or authority to issue registration cards or plates has been denied, suspended or otherwise sanctioned by the department shall have the right to appeal to the court vested with jurisdiction of such appeals by or pursuant to Title 42 (relating to judiciary and judicial procedure). The filing of the appeal shall act as a supersedeas, except for a warning or a revocation, and the suspension or monetary penalty shall not be imposed until determination of the matter as provided in this section. Upon application of the registrant and prior notice to the department, the court may grant a supersedeas from a revocation of registration or authority to issue registration. The court shall schedule the appeal for hearing upon 30 days' written notice to the department, and thereupon take testimony and examine into the facts of the case and determine whether the petitioner is entitled to registration, subject to suspension of registration or other sanction under the provisions of this title or departmental regulations.

**(b) Documentation.**--

**(1)** In any proceeding under this section, documents received by the department from a court or from an insurance company shall be admissible into evidence to support the department's case. In addition, if the department receives information from a court by means of electronic transmission or from an insurance company which is complying with its obligation under Subchapter H of Chapter 17 (relating to proof of financial responsibility) by means of electronic transmission, it may certify that it has received the information by means of electronic transmission, and that certification shall be prima facie proof of the adjudication and facts contained in such an electronic transmission.

**(2)** In a proceeding relating to the suspension of the registration of a motor vehicle imposed under section 1786 (relating to required financial responsibility), the department's certification of its receipt of documents or electronic transmission from an insurance company informing the department that the person's coverage has lapsed, been canceled or terminated shall also constitute prima facie proof that the lapse, cancellation or termination of the policy of insurance described in the electronic transmission was effective under the laws of this Commonwealth.

*75 Pa.C.S. § 1377*

1976, June 17, P.L. 162, No. 81, § 1, eff. July 1, 1977. Amended 1978, April 28, P.L. 202, No. 53, § 13(3), effective 6/27/1978; 1993, June 28, P.L. 137, No. 33, § 2; 2002, Dec. 9, P.L. 1278, No. 152, § 6.1, effective in 60 days.



# EXHIBIT D

DL-640 (3/04)

# HAVIS

## COMMONWEALTH OF PENNSYLVANIA • DEPARTMENT OF TRANSPORTATION ACKNOWLEDGMENT OF SEIZED/SURRENDERED DRIVER'S LICENSE/VEHICLE REGISTRATION

PLEASE PRINT OR TYPE ALL INFORMATION

DRIVER OR OWNER NAME: Jason Knapp

ADDRESS: 320 Port Duquesne #21E

CITY: Pgh STATE: PA ZIP: 15222

MAIL DRIVER'S LICENSE TO:  
 PennDOT  
 BUREAU OF DRIVER LICENSING  
 P.O. BOX 68688  
 HARRISBURG, PA 17106-8688

MAIL VEHICLE REGISTRATION TO:  
 PennDOT  
 BUREAU OF MOTOR VEHICLES  
 P.O. BOX 68597  
 HARRISBURG, PA 17106-8597

This will acknowledge receipt of the following items:

- Driver's License and/or  Learner's Permit # \_\_\_\_\_
- Vehicle Registration Card and/or  Plate # M63590N

**SIGN  
HERE**

*[Handwritten Signature]*  
 (SIGNATURE OF DRIVER/OWNER)

The seizure of this individual's Driver's License, Camera Card or Learner's Permit and/or Registration Card(s) and Plate(s) is authorized pursuant to Sections 1540(c) and 1376(a) of the Pennsylvania Vehicle Code.

### REASON FOR CONFISCATION:

- Deceased  Suspended/Revoked  Expired  Duplicate  Fraudulent  Faded  Mutilated
- Other: Dead Tag PSP LIFT

(OFFICERS/DLE'S NAME) Taneda

(BADGE NUMBER/DLE NUMBER) 35

(SIGNATURE) [Signature] (DATE) \_\_\_\_\_

(AREA CODE) (412) (PHONE NUMBER: USED FOR VERBAL CONFIRMATION ONLY) 885 9300

(POLICE DEPARTMENT/DL CENTER) Castle Shannon

(ADDRESS) 5310 McKuberts Rd

(CITY) Pgh (STATE) Pa (ZIP CODE) 15234

POLICE DEPARTMENT NUMBER: 

0	4	1	6	0
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Must be completed for possible reimbursement of Restoration Fee

**DEFENDANT**



# EXHIBIT E

**Subject:** [External] Re: Commonwealth of PA, Dept. of Transportation v PA State Constsabulary  
**Date:** Friday, March 15, 2024 at 11:01:48 AM Eastern Daylight Time  
**From:** Eshete Murphy, Meron  
**To:** Roy Leonard

Attorney Roy Leonard,

If you feel your client is entitled to damages as specified in your email, please file the appropriate motions and we can litigate it in court.

Thank you,

**Meron Eshete Murphy** | Assistant Counsel  
Governor's Office of General Counsel  
Department of Transportation  
Office of Chief Counsel | Western Region  
301 5th Avenue, Suite 210  
Pittsburgh, PA 15222-1210  
Phone: 412.565.7555 | Fax: 412.565.7778  
[penndot.pa.gov](http://penndot.pa.gov)

PRIVILEGED AND CONFIDENTIAL

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**From:** Roy Leonard <[rleonard@leonardfirm.com](mailto:rleonard@leonardfirm.com)>  
**Sent:** Thursday, March 14, 2024 2:54 PM  
**To:** Eshete Murphy, Meron <[meshetemur@pa.gov](mailto:meshetemur@pa.gov)>  
**Subject:** [External] Re: Commonwealth of PA, Dept. of Transportation v PA State Constsabulary

**ATTENTION:** *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Ms. Murphy:

This is to follow-up on our last conversation during which you acknowledged knowing that the registration plate for a vehicle owned by and registered to the Pennsylvania State Constabulary, and operated by Constable Jason C. Knapp, was seized by the Castle Shannon Borough police department on March 5, 2024. (See the Acknowledgment of Seized/Surrendered Driver's License/Vehicle Registration, attached.) The registration plate was seized unlawfully by virtue of the appeal filed by the Pennsylvania State Constabulary in the pending case of Commonwealth of Pennsylvania v. Pennsylvania State Constabulary, Common Pleas Court of Allegheny County, Case No. SA-23-552. Under 75 Pa.C.S.A. § 1377, "[t]he filing of the appeal (Petition for Appeal from Order

of Secretary of Transportation Suspending Operator's License/Registration Plate Number, attached) shall act as a supersedeas, except for a warning or a revocation, and the suspension or monetary penalty shall not be imposed until determination of the matter as provided in this section."

As a result of the unlawful seizure of the registration plate, the Pennsylvania State Constabulary has incurred out-of-pocket damages to have its vehicle towed in the amount of \$169.45, and has lost income, estimated to be \$813.00, because Constable Knapp has been unable to use the vehicle to perform services through the scope of his employment. (See Invoice No. 1112, attached.) Although the Pennsylvania State Constabulary may recover these damages via a motion for contempt, this is to request payment of these damages to avoid the necessity of filing any such motion.

Furthermore, because the plate was seized unlawfully, this is to request that registration plate number MG3590N be returned immediately, so that the Pennsylvania State Constabulary may mitigate its damages, until such time as a judicial determination is made as to whether the Pennsylvania State Constabulary is entitled to registration.

Please call before the end of the business day tomorrow, March 15, to discuss this matter.

Roy E. Leonard, Esq.  
LEONARD, PLLC  
105 Market St., Suite 300  
Pittsburgh, PA 15222  
p. 412.448.2868  
f. 412.448.2860  
[rleonard@leonardfirm.com](mailto:rleonard@leonardfirm.com)  
[www.leonardfirm.com](http://www.leonardfirm.com)

---

**From:** Roy Leonard <[rleonard@leonardfirm.com](mailto:rleonard@leonardfirm.com)>

**Date:** Tuesday, March 5, 2024 at 10:01 AM

**To:** [meshetemur@pa.gov](mailto:meshetemur@pa.gov) <[meshetemur@pa.gov](mailto:meshetemur@pa.gov)>

**Subject:** Commonwealth of PA, Dept. of Transportation v PA State Constabulary

Ms. Murphy,

I have been recently retained by Defendant, PA State Constabulary, to be substituted as counsel for Richard Erensberger. A copy of the Praecipe for Substitution that has been filed with the DCR is attached. I would like to discuss this matter with you including having the March 14 hearing continued and terms to be considered to resolve this matter between the parties. Please let me know if you are available for a call today to discuss. Thanks.

Roy E. Leonard, Esq.  
LEONARD, PLLC  
105 Market St., Suite 300  
Pittsburgh, PA 15222

p. 412.448.2868  
f. 412.448.2860  
[rleonard@leonardfirm.com](mailto:rleonard@leonardfirm.com)  
[www.leonardfirm.com](http://www.leonardfirm.com)

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# EXHIBIT F

# Magisterial District Judge 05-2-17

## DOCKET

Docket Number: MJ-05217-TR-0000876-2024

## Traffic Docket



Commonwealth of Pennsylvania  
v.  
Jason Christopher Knapp

Page 1 of 1

### CASE INFORMATION

<u>Judge Assigned:</u>	Magisterial District Judge David J. Barton	<u>Issue Date:</u>	
<u>OTN:</u>		<u>File Date:</u>	04/03/2024
<u>Arresting Agency:</u>	Pittsburgh PSP	<u>Arrest Date:</u>	
<u>Citation No.:</u>	TA 0724404-2	<u>Incident No.:</u>	PA 2022-1072926
<u>Disposition:</u>		<u>Disposition Date:</u>	
<u>County:</u>	Allegheny	<u>Township:</u>	Castle Shannon Borough
<u>Case Status:</u>	Active		

### STATUS INFORMATION

<u>Case Status</u>	<u>Status Date</u>	<u>Processing Status</u>
Active	04/12/2024	Awaiting Scheduling
	04/03/2024	Awaiting Plea

### DEFENDANT INFORMATION

<u>Name:</u>	Knapp, Jason Christopher	<u>Sex:</u>	Male
<u>Date of Birth:</u>	08/08/1986	<u>Race:</u>	White

Address(es):  
**Home**  
Pittsburgh, PA 15222

### CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>
Arresting Officer	Gordon, Timothy R. Jr.
Defendant	Knapp, Jason Christopher

### CHARGES

<u># Charge</u>	<u>Grade</u>	<u>Description</u>	<u>Offense Dt.</u>	<u>Disposition</u>
1 75 § 1301 §§ A	S	REG REQUIRED - PA REG EXP > 60 DAYS, NON-PA EXPIRED, OR UNREGISTERED	03/05/2024	

### DOCKET ENTRY INFORMATION

<u>Filed Date</u>	<u>Entry</u>	<u>Filer</u>	<u>Applies To</u>
04/12/2024	Summons Cancelled	Magisterial District Court 05-2-17	Jason Christopher Knapp, Defendant
04/12/2024	Not Guilty Plea Entered	Jason Christopher Knapp	Jason Christopher Knapp, Defendant
04/04/2024	Summons Issued	Magisterial District Court 05-2-17	Jason Christopher Knapp, Defendant
04/04/2024	First Class Summons Issued	Magisterial District Court 05-2-17	Jason Christopher Knapp, Defendant
04/03/2024	Traffic Citation Filed	Magisterial District Court 05-2-17	



IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
SUMMARY APPEALS BRANCH

COMMONWEALTH OF PENNSYLVANIA,                      No. SA 23-552

Plaintiff,

v.

PENNSYLVANIA STATE CONSTABULARY,

Defendant.

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, upon consideration of Defendant Pennsylvania State Constabulary's Motion to Enforce the Automatic Supersedeas and for Sanctions, and for good cause shown, it is hereby ordered as follows:

1. Plaintiff, Commonwealth of Pennsylvania, shall return registration plate number MG3590N to Defendant Pennsylvania State Constabulary within the next five (5) business days and shall refrain from seizing and otherwise directing the seizure of such Registration Plate from Defendant unless and until this Court enters an order requiring the return of such registration plate to Plaintiff; and
2. Defendant Pennsylvania State Constabulary is hereby awarded the amount of \$982.45, and attorney's fees to be determined, as a direct result of damages that said Defendant has incurred as a direct result of the improper seizure of such registration plate.

BY THE COURT

\_\_\_\_\_, J.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record listed below by Electronic Mail and/or ordinary U.S. Mail, First Class service, postage prepaid, on this 15th day of April, 2024.

Meron Eshete Murphy, Esquire  
Pennsylvania Department of Transportation  
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Pittsburgh, PA 15222  
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*Counsel for Plaintiff  
Commonwealth of Pennsylvania, Department of Transportation*

/s/ Roy E. Leonard  
Roy E. Leonard, Esquire

*Counsel for Defendant  
Pennsylvania State Constabulary*