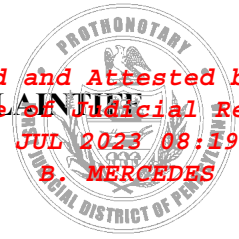


THE LAW OFFICE OF JARED S. ZAFRAN, LLC

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ATTORNEYS FOR PLAINTIFF

Filed and Attested by the
Office of Judicial Records
25 JUL 2023 08:19 am
B. MERCEDES



MAJOR CASE

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

TYTIANNA HAWTHORNE, Administrator:
of the Estate of SU'LAYAH WILLIAMS :
deceased :
2429 N. Natrona Street :
Philadelphia, PA 19132 :

Plaintiff :

vs. :

NORTHEAST TREATMENT CENTERS, :
INC. :
7520 State Road :
Philadelphia, PA 19136 :
and :

JOHN DOE(S) 1-3, used herein to designate :
one or more unknown parties to this incident:

Defendant(s) :

NO.: 230601794

AMENDED COMPLAINT

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.

Delaware County Bar Association
Lawyer Referral and Information Service
335 West Front Street
Media, PA 19063
(610) 566-7952

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia 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 notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. 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 suficiente de pagar tal servicio. Vaya en persona o llame por teléfono a la oficina cuya dirección se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociación De Licenciados De Delaware County
Servicio de Referencia E Información Legal
335 West Front Street
Media, PA 19063
(610) 566-7952

Case ID: 230601794

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ATTORNEYS FOR PLAINTIFF

TYTIANNA HAWTHORNE,

Administrator of the Estate of Su'Layah Williams,

Plaintiff

V.

NORTHEAST TREATMENT CENTERS, INC

And John Does 1-3,

Defendants

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COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

: No. 230601794

PLAINTIFF'S FIRST AMENDED COMPLAINT

1. Plaintiff Tytianna Hawthorne is a citizen and resident of the Commonwealth of Pennsylvania residing at 2949 N. Natrona Street in Philadelphia, Pennsylvania 19132.

2. Plaintiff Tytianna Hawthorne is the mother of Su'Layah Williams, deceased, who was killed on February 4, 2023 at the age of 2 years old.

3. Plaintiff Tytianna Hawthorne is the administrator of the Estate of Su'Layah Williams. (See, Exhibit A, Letters of Administration).

4. Defendant, Northeast Treatment Center, Inc. (NET) is a domestic non-profit corporation that serves as a Community Umbrella Agency (CUA) tasked by the Philadelphia Department of Human Services (DHS) with monitoring children placed in foster care and ensuring their safety in those placements.

5. John Does 1-3 are persons and or corporate entities unknown at this time that participated in the supervision of Su'Layah Williams during her time in foster care.

6. At all times relevant and material hereto, Plaintiff's minor child, was under the custody, care, and/or control of the DHS and its CUA agency, NET.

7. At all times relevant, Defendant NET acted through its employees, agents, contractors, and/or subcontractors.

FACTS

8. On February 4, 2023, Su'Layah Williams, a vibrant, happy toddler, was murdered in the apartment of the foster parents, Danaejah Harper and partner Diamond Joyner, to whom she was given under circumstances of deceit and the negligent actions of Defendant CUA.

9. On that day, Su'Layah Williams suffered blunt force trauma to her torso, lacerations of her mesentery and pancreas, hemoperitoneum, contusions of her intestines, diaphragm, bladder and uterus, blunt impact injuries to her head, multiple contusions and abrasions of scalp and face, subarachnoid hemorrhage.

10. The Medical Examiner reported Su'Layah's death as a homicide.

11. The placement of Su'Layah Williams with Danaejah Harper and Diamond Joyner was part of an almost-two-year effort undertaken by DHS staff members and CUA personnel of Defendant NET to take Su'Layah Williams from her family and make parents out of Danaejah Harper and Diamond Joyner, as they stated they wanted to start a family of their own and could not.

12. DHS and Defendant's parent-creation expedition directly resulted in Su'Layah Williams' murder in the custody of Harper and Joyner.

13. Defendant Danaejah Harper has no family relationship in any way to Tytianna Hawthorne. Despite this fact, Danaejah Harper claimed to be Tytianna Hawthorne's sister.

14. No evidence in any state database, no birth certificate, absolutely no legal authority

supports the contention by Danaejah Harper that she is related in any way to Tytianna Hawthorne.

15. Likewise, since Danaejah Harper is not related to Tytianna Hawthorne in any way, Harper was not related to Su'Layah Williams.

16. Su'Layah Williams was born to Tytianna Hawthorne and her father Keyshawn Williams on June 27, 2020.

17. She was a happy child and lived with her mother and interacted with both her parents.

18. On September 22, 2021, DHS began an investigation based on a bizarre General Protective Services (GPS) report from an "anonymous" complaint about mistreatment of Su'Layah while she was in the custody of Plaintiff, Tytianna Hawthorne.

19. The reports from this anonymous source included an allegation that Su'Layah had been burned by a cigar or hot liquid based on a posting to social media. The allegations were preposterous, as Su'Layah suffered from a skin condition that was treated with medicine. Medical professionals confirmed that the marks on her legs were not from a burn.

20. On September 23, 2021, DHS got a "supplemental support" from a supposedly anonymous source stating that Ms. Hawthorne was homeless.

21. On September 24, 2021, DHS came to speak with Danaejah Harper, who identified herself to DHS personnel as Su'Layah's Maternal Aunt.

22. This representation was materially false and easily verifiable.

23. DHS made no effort to confirm this fictitious family relationship purported by Harper.

24. During Su'Layah's life between her birth on June 27, 2020 and John Garvin's DHS investigation and placement, Danaejah Harper had absolutely no interaction with Su'Layah

Williams.

25. Upon information and belief, Plaintiff asserts that the “anonymous” source of the DHS complaints that initiated this investigation were made by Danaejah Harper and were meant to initiate DHS action to have Su’Layah placed with Harper, as she was unable to conceive a child with her partner Diamond Joyner.

26. Harper and Joyner utilized DHS in taking Su’Layah Williams from her parents and her actual family members so that they could avoid a legal process whereby they had to formally adopt a child or be appointed as foster parents through Family Court hearings in the dependency program.

27. DHS and Defendant NET as CUA effectuated this cost-effective way to become parents by Harper and Joyner.

28. During its initial investigation, DHS met with Plaintiff and Plaintiff’s actual Aunt, A.W. on October 1, 2021.

29. Despite Plaintiff’s Aunt A.W. being available as a resource, DHS chose to look immediately for placement of Su’Layah with Danaejah Harper.

30. John Garvin and D. Kilpatrick were the DHS employee certified Harper and Joyner as resources for Su’Layah.

31. On October 6, 2021, DHS visited Danaejah Harper’s home and cleared her as a foster parent resource for placement of Su’Layah.

32. On October 8, 2021, DHS worker John Garvin produced a Safety Plan that placed Su’Layah Williams with Danaejah Harper. The document purportedly is signed by Plaintiff, but it’s clearly a printed forgery and is undated. Plaintiff never agreed to her daughter being placed with Danaejah Harper.

33. The City of Philadelphia's Solicitor's Office filed a Dependency Petition with Court of Common Pleas stating that Plaintiff agreed to Danaejah Harper as a resource parent for Su'Layah. This allegation was false.

34. The Dependency Petition contained other falsehoods, including a statement that Su'Layah and Tytianna Hawthorne "resided" with Harper in the past and left her home in May 2021.

35. Danaejah Harper and her partner Diamond Joyner lacked fundamental economic resources to support Su'Layah at the outset of the placement and never should have been certified.

36. Likewise, neither were parents, had never demonstrated any parenting capacity, and had no connection to Su'Layah Williams in any way.

37. The placement of Su'Layah Williams with them at the outset of this investigation violated the Child Protective Services Law (CPSL).

38. At the time of the certification on October 8, 2021, Harper was 21 years old and Joyner was 22.

39. The income listed for them for the month was \$1000 through work as a home health aide. The expenses listed were \$1155.

40. DHS' focus on Danaejah Harper and Diamond Joyner as the resource parents is a mystery. The focus ended in Su'Layah's death.

41. On December 12, 2021, the Dependency Petition was dismissed by the Court for lack of evidence.

42. By this time, Su'Layah had been removed from the custody of Harper and Joyner and placed in the legal and physical custody of her father Keyshawn Williams.

43. All DHS services and CUA services provided to the family through CUA Turning

Points for Children ended in December 2021.

44. Keyshawn Williams maintained custody of Su'Layah until March of 2022, when DHS and NET CUA became reinvolved in Su'Layah's life again.

45. NET CUA staff became assigned to Su'Layah Williams again in March of 2022. At this time, Su'Layah was living with Tytianna Hawthorne.

46. What triggered DHS and NET becoming re-involved in Su'Layah's life is unclear.

47. DHS did not file a dependency petition.

48. No record of a GPS report exists.

49. In March 2022, DHS and NET enacted a new safety plan in which Su'Layah was to live with Keyshawn Williams aunt V.M.

50. Su'Layah was doing well at V.M.'s home in March of 2022.

51. Both of her parents interacted with Su'Layah at V.M.'s home.

52. DHS personnel Portia Henderson and Charles Furman produced this safety plan that bears the actual signatures of both parents unlike the document that gave custody to Harper in October of 2021.

53. Tellingly, DHS listed the family name in the safety plan as "Harper," despite Su'Layah's name being Williams and Harper not actually a family member.

54. Some time in April 2022, NET social workers determined that V.M. was unable to care for Su'Layah since Su'Layah was diagnosed with asthma and V.M. smoked cigarettes.

55. NET Social Worker and Nurse made a determination that Su'Layah had to be removed from V.M.'s care despite an active Safety Care Plan in place for V.M. to have Su'Layah.

56. NET and DHS social workers turned to non-family member Danaejah Harper as the parent resource again.

57. DHS and CUA made no effort to initiate Tytianna Hawthorne resuming custody of Su'Layah.

58. DHS and CUA also did not explore any other arrangements with the Hawthorne or Williams extended families.

59. CUA falsely characterized Tytianna Hawthorne as disengaged from CUA services.

60. At this time, no dependency petition governed Su'Layah's custody and no new safety plan existed to appoint Harper and Joyner as caregivers.

61. DHS filed no Dependency petition and no court authority governed the removal of Su'Layah from an agreed-upon family parenting resource in V.M. to placement with Harper and Joyner.

62. Brittany Davis, NET CUA Case Manager, and a CUA nurse recommended that V.M. surrender Su'Layah to Harper.

63. NET staff did not draft a new safety plan.

64. NET staff did not ask for any consent by Keyshawn Williams or Tytianna Hawthorne.

65. Harper and Joyner again took custody of Su'Layah.

66. NET staff simply chose Harper and Joyner even as it remains unclear how Harper and Joyner remained on the radar, since they only had brief custody, supported by abject lies perpetrated by DHS in the dependency petition, in October and November 2021.

67. Harper became a resource despite lying about Harper's family connection to Su'Layah, never having interacted with Su'Layah prior to John Garvin's decision to involve Harper in Su'Layah's life, and the false story about Su'Layah being burned that began DHS involvement in the first place.

68. Somehow all of these falsehoods, the clear lack of financial resources to support Su'Layah as a couple, and Harper's and Joyner's lack of any prior parenting experience were no barrier to their qualification as a parental resource for NET personnel.

69. NET simply handed Su'Layah over to Danaejah despite the vehement protests of Plaintiff Tytianna Hawthorne.

70. As Su'Layah's mother, Tytianna Hawthorne knew that Danaejah Harper should not be near her child and certainly not have custody of her.

71. On May 1, 2022, she texted NET CUA Case Manager Brittany Davis and said "I was told y'all tryinna send Su'Layah with danaejah I don't want her with her. I don't mess with that girl I don't want her around my child nor in her life I refuse." (See, Exhibit B, text of May 1, 2022).

72. NET CUA Case Manager ignored this warning. Su'Layah was dead at the hands of Harper and Joyner less than a year later.

73. NET CUA Case Manager and DHS staff never completed another safety plan for Harper and Joyner.

74. NET CUA Case Manager actively encouraged and advised Harper on a way to gain custody of Su'Layah Williams that involved actively misrepresenting her family connection to Su'Layah and NET CUA's approval of Harper as a foster parent.

75. NET CUA's choice of this path to move Su'Layah's custody to Harper defies credulity.

76. NET CUA never recommended another dependency petition be filed so that a Court would be monitoring Su'Layah's care.

77. NET CUA ignored safety risks brought about by economic strains on the

relationship problems between Harper and Joyner that endangered Su'Layah.

78. All the while, NET CUA participated in and allowed for Harper to materially misrepresent the family situation to the Court in Custody Hearings in support of the custody petition docketed at OC2105826 that was filed on May 6, 2022. (See Exhibit C, Petition).

79. The basis for Harper to even have Su'Layah in her home was not supported by any legal court order or even a legal theory.

80. She was placed there by NET CUA Case Manager Brittany Davis without any supporting legal authority, dependency order, finding of abuse, or any other family court procedural mechanism.

81. Over the next few months, NET CUA continually ignored safety risks for Su'Layah and continued to support Harper's illegal petition for custody of Su'Layah Williams.

82. NET CUA's support of the custody petition was helpful for Harper's bid to get custody of Su'Layah, because in a custody petition, Plaintiff Tytianna Hawthorne and Keyshawn Williams are not afforded attorneys, as they would have been in a dependency setting in family court.

83. NET CUA supported Harper's petition despite Su'Layah not even being with Harper for more than a few days on May 6, 2022.

84. NET CUA was not even the CUA agency for Su'Layah Williams when she was first placed in foster care with Harper and Joyner.

85. NET CUA had absolutely no evidence that Harper and Joyner were cleared for placement again when NET CUA signed off on this.

86. Upon information and belief, NET CUA staff conspired with DHS to reunite Harper and Joyner with Su'Layah outside of the typical dependency procedures.

87. No documents exist demonstrating how Harper and Joyner became resources yet again.

88. The timing of the placement with Harper and Joyner reveals that NET CUA encouraged Harper to file for custody of a child she had no relationship with, hadn't seen in over six months and had only had in her home for a few days.

89. After Harper and Joyner regained custody of Su'Layah in May 2022, they specifically refused to let Plaintiff Tytianna Hawthorne visit her daughter.

90. These claims were untrue and as a result of the negligence of NET CUA, Danaejah Harper was able to represent to the court that she was a bona fide member of the

91. This process continued from May 2022 through January 31, 2023.

92. In August 2022, Danaejah Harper testified at a hearing before Custody Hearing Officer Mike Zaleski.

93. Despite clear threats to Su'Layah's life from physical abuse in the Harper-Joyner home, NET CUA recommended that DHS close its case on Su'Layah Williams without any further monitoring.

94. NET CUA closed the case in November 2022, despite active goals for Su'Layah's parents for reunification, as required by the CPSL.

95. NET CUA actively worked against all rules and regulation of the CPSL in terms of family reunification.

96. NET CUA never offered any support to Su'Layah's parents as required to advance them toward custody.

97. NET CUA operated completely outside the CPSL requirements to traffic Su'Layah Harper to the two people who murdered her.

98. In January 31, 2023 with NET CUA's encouragement and assistance, Harper was awarded sole legal and physical custody by Judge Michael Fanning.

99. On February 4, 2023, Su'Layah Williams was murdered at the hands of Joyner and Harper.

100. The accounts given by Harper and Joyner to DHS and hospital staff are incredible as to the manner in which Su'Layah came to stop breathing.

101. Su'Layah died of blunt force trauma to multiple parts of her body and lived for a few hours in abject pain as she hemorrhaged throughout her torso.

102. During this time she endured conscious pain and suffering without the ability to help herself.

103. She could only cry out to her very caregivers, one or both of which was directly responsible for her killing.

104. Joyner and/or Harper struck Su'Layah so violently that her life was draining from her as her organs failed from blood loss. They let her lay untreated while they concocted a story about her injuries. Within hours of the violent attack, Su'Layah suffered cardiac arrest.

105. At the time of her death, Su'Layah weighed 31 pounds and was 2'11" tall.

106. Medical professionals at CHOP knew right away that Su'Layah had been violently killed and had prior bruising and injuries that demonstrated that Harper and Joyner had been abusing Su'Layah prior to the date of her killing.

107. CHOP physicians and staff with evidence of Su'Layah's violent death immediately notified DHS of the abuse as required.

108. A physical examination of Su'Layah at the hospital on February 4, 2023 showed multiple bruises throughout her body that were the product of longstanding abuse and would have

been evident to any NET CUA personnel that was regularly checking on the safety of Su'Layah in the months immediately before her death.

109. This physical abuse, if investigated, would have led to the removal of Su'Layah from her murderous foster parents long before they had the chance to kill her.

110. DHS immediately conducted interviews with their chosen foster parents. The interviews clearly demonstrate that the only adults who spent any time with Su'Layah in the hours before her death were Harper and Joyner.

111. DHS also conducted an interview with a boy who was present for Su'Layah's murder who told them that he saw Joyner kick Su'Layah repeatedly.

112. In that interview, the boy told DHS interviewers that he also saw Harper strike Su'Layah on her face on a prior day.

113. In an interview with DHS, Joyner stated that she and Harper were motivated to get Su'Layah because they were unsuccessful in having a baby on their own.

114. In late February, DHS produced letters to Harper and Joyner, Plaintiff and Keyshawn Williams in which it found that Su'Layah was a victim of abuse.

115. The DHS reports single out Joyner as the AP, Alleged Perpetrator.

116. NET CUA never investigated the Harper-Joyner foster parenting team properly and they simply gave Su'Layah to them in May 2022 without any legal authority or justification.

117. NET CUA's Case Manager or other employees never investigated clear abuse of Su'Layah during their time supervising her.

118. NET CUA's Case Manager Davis and Nurse viewed V.M. as a danger to Su'Layah. Instead, their chosen caregivers, Harper and Joyner, were responsible for killing Su'Layah.

119. A few weeks after her death, Su'Layah's **actual family** gave her a funeral.

120. Harper and Joyner did not attend Su'Layah's funeral.

121. Upon information and belief, Harper and Joyner held their own memorial and balloon release, presumably to celebrate their freedom from arrest despite Su'Layah's murder at their hands.

122. Su'Layah Williams is dead because NET CUA personnel negligently trafficked her in violation of the CPSL to Harper and Joyner.

123. DHS personnel played a strong part in this tragedy as well.

124. All of these acts by Defendant were directly responsible and caused Su'Layah Williams death. None of these acts were the fault of Su'Layah Williams, Plaintiff Hawthorne or Keyshawn Williams.

125. At the time of the filing of this complaint, Joyner and Harper walk the streets free of arrest.

126. This action is the first effort by her parents to bring those responsible for Su'Layah's murder and the circumstances that placed her in the custody of those responsible for her murder to justice.

127. The negligence of NET, consisted of the following:

- a) Failure to properly investigate the relationship history of Joyner and Harper prior to placing Su'Layah Williams with them;
- b) Failure to determine the suitability of Joyner and Harper as parents able to properly care for Su'Layah Williams prior to placing Su'Layah Williams with them;
- c) Encouraging Harper to falsify her family status with a custody petition filed with the Court;

- d) Engaging in multiple activities in violation of the CUA's role under the CPSL to explore actual family placement of Su'Layah Williams where Su'Layah William's life would not have been endangered and she would not have been killed;
- e) Failing to produce true records related to Su'Layah William's care in the custody;
- f) Failing to document repeated abuse by Joyner and Harper prior to the closing of the file in November 2022 and the awarding of custody to Harper in January 31, 2023;
- g) Failing to recommend a dependency petition to provide the Court with an opportunity to review the Harper-Joyner home with periodic reports;
- h) Transferring custody to Harper and Joyner without a proper safety plan or court intervention;
- i) Failing to follow policies and procedures of proper placement of children under the CPSL and DHS guidelines;
- j) Failing to assess the parenting capacity of Joyner and Harper prior to placement of Su'Layah Williams;
- k) Failing to properly investigate and document prior abuse of Su'Layah by Joyner and Harper;
- l) Failing to get an accurate assessment of Joyner and Harper's economic viability as parents prior to and during Su'Layah's placement;
- m) Failing to document bruising and other injuries to Su'Layah prior to November 2022;

- n) Closing the supervision of Su'Layah without properly documenting abuse of Su'Layah;
- o) Failing to follow Childline procedures related to reporting abuse of Su'Layah;
- p) Failing to alert DHS that a dependency petition was necessary for the placement with Harper a non-family member;
- q) Utilizing Harper and Joyner as kinship resources when neither is actually related to Su'Layah Williams;
- r) Failing to investigate the true nature of Harper and Joyner's relationship to establish that they were a stable couple, ages 22-23, that had the means and capacity to parent Su'Layah Williams safely.
- s) Failing to interview other children who were also periodically in the Harper-Joyner home to learn of repeated abuse of Su'Layah;
- t) Engaging in a scheme to induce the Court of Common Pleas to give custody of Su'Layah Williams through falsified documents regarding Harper's family history and the history of care in the Harper-Joyner home;
- u) Encouraging Harper to file for custody days after being given custody of Su'Layah Williams under no existing legal mechanism;
- v) Failing to do any inspection of the Harper-Joyner home in any way before simply removing Su'Layah from the care of V.M.;
- w) Actively preventing Su'Layah's parents from reconnecting with her parents so that the supported scheme of trafficking Su'Layah to Harper and Joyner succeeded;
- x) Acting completely outside of the CPSL with its encouragement of Harper's

custody;

128. Defendant NET's negligence caused the death of Plaintiff's Child, Su'Layah Williams.

COUNT I – WRONGFUL DEATH
TYTIANNA HAWTHORNE, as Administrator of the Estate of SU'LAYAH WILLIAMS
v. NET

129. Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, incorporates by reference thereto all paragraphs above inclusive, as though the same were set forth herein at length.

130. As a result of Defendant NET's negligence, Plaintiff's child, Su'Layah Williams, died.

131. Plaintiff brings this action under and pursuant to the Pennsylvania Wrongful Death Act, 42 Pa.C.S. A. §8301, on her own behalf and on behalf of Su'Layah Williams's statutory heirs and demands damages of Defendant for the losses suffered by Su'Layah Williams's survivors, including but not limited to medical expenses, future economic losses and loss of support for family, emotional and psychological support and comfort and society, funeral expenses, other expenses reasonably associated with her death, and for all other legally compensable damages associated with the decedent's injuries and death.

WHEREFORE, Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, demands judgment against above Defendant in a sum greater than \$50,000.00, plus interest and other relief which the Court may deem appropriate.

COUNT II – SURVIVAL ACTION
TYTIANNA HAWTHORNE, as Administrator of the Estate of SU'LAYAH WILLIAMS,
v. NET

132. Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, incorporates by reference thereto all paragraphs above inclusive, as though the same were set forth herein at length.

133. Plaintiff brings this action on behalf of the Estate of the Decedent, Su'Layah Williams, under and pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, for all damages recoverable by law, including for the conscious pain and suffering which she endured up to and including the time of her death as a result of the negligence of the Defendant, NET, and for all other legally compensable expenses incurred in connection with the decedent's injuries and death.

WHEREFORE, Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, demands judgment against above Defendant in compensatory damages in a sum greater than \$50,000.00, plus interest and other relief which the Court may deem appropriate.

COUNT III – WRONGFUL DEATH
TYTIANNA HAWTHORNE, as Administrator of the Estate of SU'LAYAH WILLIAMS,
v. JOHN DOE(S) 1-3

134. Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, incorporates by reference thereto all paragraphs above inclusive, as though the same were set forth herein at length.

135. As a result of Defendant, John Doe(s) 1-3's, negligence, Plaintiff's child, Su'Layah Williams, died.

136. Plaintiff brings this action under and pursuant to the Pennsylvania Wrongful Death Act, 42 Pa.C.S. A. §8301, on his own behalf and on behalf of Su'Layah Williams's statutory heirs and demands damages of Defendant for the losses suffered by Su'Layah Williams's survivors,

including medical expenses, funeral expenses, other expenses reasonably associated with her death, and for all other legally compensable damages associated with the decedent's injuries and death.

WHEREFORE, Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, demands judgment against above Defendant in compensatory damages in a sum greater than \$50,000.00, plus interest and other relief which the Court may deem appropriate.

COUNT IV – SURVIVAL ACTION
TYTIANNA HAWTHORNE, as Administrator of the Estate of
SU'LAYAH WILLIAMS, v. JOHN DOE(S) 1-3

137. Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, incorporates by reference thereto all paragraphs above inclusive, as though the same were set forth herein at length.

138. Plaintiff brings this action on behalf of the Estate of the Decedent, Su'Layah Williams, under and pursuant to the Pennsylvania Survival Act, 42 Pa.C.S.A. §8302, for all damages recoverable by law, including for the conscious pain and suffering which she endured up to and including the time of her death as a result of the negligence of the Defendant, John Doe(s) 1-3, and for all other legally compensable expenses incurred in connection with the decedent's injuries and death.

WHEREFORE, Plaintiff, Tytianna Hawthorne, as Administrator of the Estate of Su'Layah Williams, deceased, demands judgment against above Defendant in compensatory damages a sum greater than \$50,000.00, plus interest and other relief which the Court may deem appropriate.

THE LAW OFFICE OF JARED S. ZAFRAN, LLC

BY: /s/ Jared S. Zafran
JARED S. ZAFRAN, ESQUIRE
Attorney for Plaintiff



A.J. THOMSON, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I, Tyttianna Hawthorne, Administrator of the Estate of Su'Layah Williams, my daughter, verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsifications to authorities.

THE LAW OFFICE OF JARED S. ZAFRAN, LLC



ID sVKXNXx77F8Eo2sGbk2uaWsD

TYTIANNA HAWTHORNE

DATE: 7/24/23

eSignature Details

Signer ID:	sVKXNXx77F5Eo2sGbk2uaWsD
Signed by:	Tytianna Hawthorne
Sent to email:	tyti.hawthorne24@gmail.com
IP Address:	68.81.90.223
Signed at:	Jul 24 2023, 5:37 pm EDT

EXHIBIT A

Office of the Register of Wills of Philadelphia County, Pennsylvania

File #: A1396-2023

Commonwealth of Pennsylvania

County of Philadelphia

} ss.

I, **TRACEY L. GORDON**, Register for the Probate of Wills and Granting Letters of Administration in and for the County of Philadelphia, in the Commonwealth of Pennsylvania

DO HEREBY CERTIFY AND MAKE KNOWN That on the 23rd day of March

in the year of our Lord 2023 **LETTERS OF ADMINISTRATION**

on the Estate of Su'Layah Marie Willilams

Deceased, were granted unto Tytianna Hawthorne

having first been qualified well and truly to administer the same. And I further certify that no revocation of said Letters appears of record.

Date of death 2/4/2023

Given under my hand and seal of office, this 23rd day of March, 20 23



Justin Gray
Deputy Register

NOT VALID WITHOUT ORIGINAL SIGNATURE AND IMPRESSED SEAL

EXHIBIT B

2:08

LTE 71

156

C

Cua >

May 1, 2022 at 12:17 PM

So what if I file custody for her ?

12:17 PM

Because honestly everything is
getting on my nerves it's not fair
keyshawn can go see her
whenever he want too and I gotta
go thru y'all for all this extra stuff

12:18 PM

I was told y'all trynna send
Su'Layah with danaejah I don't
want her with her. I don't mess
with that girl I don't want her
around my child nor in her life I
refuse

12:52 PM

Case ID: 230601794



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

DANAEJAH R. HARPER

PETITIONER

FAMILY COURT DIVISION
CIVIL ACTION
CUSTODY

VS.

KEYSHAWN T. WILLIAMS

RESPONDENT

No. 0C2105826

COMPLAINT FOR ☐ PRIMARY PHYSICAL CUSTODY ☐ PARTIAL PHYSICAL CUSTODY
☐ SUPERVISED PHYSICAL CUSTODY

FILED

MAY 06 2022

Domestic Relations Branch
Family Division

1. The petitioner is DANAEJAH R. HARPER
Residing at 6406 PEARL STREET
PHILADELPHIA, PA 19139

2. The Respondent is KEYSHAWN T. WILLIAMS
Residing at
CONFIDENTIAL

3. Petitioner seeks CUSTODY of the following child(ren):

Name: DEP 4

Out of Wedlock: YES

Name:

Out of Wedlock:

Name:

Out of Wedlock:

Name:

Out of Wedlock:

During the past five years, the child(ren) have resided with the following persons and at the following addresses:

Name:

From:

Address:

To:

Name:

From:

Address:

To:

Name:
From: To:
Address:

The mother of the child(ren) is TYTIANNA R. HAWTHORNE
Currently residing at 1815 S 55TH STREET
PHILADELPHIA, PA 19143

She is ____ (Marital Status).

The father of the child(ren) is KEYSHAWN T. WILLIAMS
Currently residing at ****CONFIDENTIAL****

He is ____ (Marital Status).

4. The relationship of the petitioner to the child(ren) is that of
M/AUNT. Petitioner currently resides with the following persons:
5. The relationship of the respondent to the child(ren) is that of
FATHER. The respondent currently resides with the following persons:
6. The Petitioner has participated as a party or witness, or in another
capacity, in other litigation or knows information of a custody
proceeding concerning the child(ren) in this or another Court. The
Court term and number, and its relationship to this action is:
N/A

Petitioner **knows** of a person not a party to the proceeding who has
physical custody of the child(ren) or claims to have custody or
visitation rights with respect to the child(ren).
The name and address of such person(s) is:
N/A

7. The best interest and permanent welfare of the child(ren) will be
served by granting the relief requested because _____
M/AUNT REQUESTS SOLE PHYSICAL & SOLE LEGAL CUSTODY OF 1 MINOR
CHILD.
8. Each parent whose parental rights to the child(ren) have not been
terminated and the person who has physical custody of the child(ren)
have been named as parties to this action. All other persons named
below who are known to have or claim a right to custody or visitation