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ATTORNEY FOR PLAINTIFF

MELISSA BEMER,	:	IN THE COURT OF COMMON PLEAS OF
Plaintiff	:	DELAWARE COUNTY, PA
	:	
vs.	:	
	:	Docket #2024-007234
STEPHEN BOERNER,	:	
	:	
Defendant	:	IN DIVORCE
	:	

**OBJECTIONS AND ANSWERS TO REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TOWARDS PLAINTIFF, MELISSA BEMER**

GENERAL OBJECTIONS

1. Plaintiff objects to the instructions contained in the Request for Production of Documents to the extent they impose, or attempt to impose, any obligations upon Plaintiff that are inconsistent with and/or exceed the requirements of the Pennsylvania Rules of Civil Procedure, the applicable rules governing practice in the Court of Common Pleas of Montgomery County, or applicable case law.

2. Plaintiff objects to the disclosure of any information protected by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities. Plaintiff reserves the right to assert a privilege with respect to any such information, and further assert the right to request the return of all privileged information that may be inadvertently disclosed.

3. Plaintiff preserves all evidentiary objections and, accordingly, no waiver by Plaintiff of any objection is to be implied from these responses, or the information disclosed. To the extent that any response might arguably waive an otherwise assertable objection or claim of privilege, immunity

or confidentiality, such waiver shall be limited only to the specific subject matter of the response and shall not extend to any other matter or any further discovery request. Specifically, by responding to these or other discovery requests, Plaintiff is not admitting that the subject matter of the response is relevant to the pending action or not protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privileges or immunities.

4. Plaintiff objects to these Request for Production of Documents to the extent that it calls for information that is neither relevant to the subject matter involved in the pending action, nor reasonably calculated to lead to the discovery of admissible evidence.

5. Plaintiff's response is based only upon information and documents reasonable available and known to them and their counsel after a reasonable diligent investigation and search of their records and files. Plaintiff reserved the right to supplement or modify any and all of its objections and responses if additional information is obtained or otherwise becomes available.

6. Plaintiff hereby incorporates by reference, as if fully set forth therein, each of the foregoing general objections in each of the specific responses to each of the requests in the Request for Production of Documents.

7. Without waiving said Objections Plaintiff produces the following documents in response to the Request for Production of Documents.

REQUESTS

1. Copies of your federal and state individual/joint personal income tax returns, and any amendments thereto, including W-2 forms, 1099s and all attached schedules filed by you or jointly with another individual for 2022 to present.

See attached Joint 2022 Federal Income Tax Return

See attached Joint 2022 Missouri Individual Income Tax Return

See attached Joint Pennsylvania Tax Return

See attached Husband's 2022 City of Philadelphia Business Income and Receipts Tax Return

See attached Husband's 2022 City of Bethlehem & Bethlehem Area School District Business Privilege and Mercantile Tax Return for Hatch House Ventures, LLC Stephen J. Boerner

See attached Husband's 2022 City of Bethlehem & Bethlehem Area School District Business Privilege and Mercantile Tax Return for Hatch Lab LLC DBA Helium IQ

See attached Husband's 2022 W2 for Payit, LLC

See attached Husband's 2022 1099 with Pubtrawlr, LLC

See attached Husband's 1099-SA with Avidia Bank

See attached Husband's 2022 Morgan Stanley 1099

See attached Wife's 2022 W2s for The Graham Company and Pennsylvania Hospital

See attached Wife's 2022 1095-C

See attached Husband's 2022 1095-C

See attached 2022 Mortgage Interest Statement Form 1098 for 1st Colonial Community Bank

See attached 2022 Mortgage Interest Statement Form 1098 for Wells Fargo

See attached Schedules submitted by Husband for 2022 Tax Returns; Utilities Listing for Properties, Consulting Expenses, HOA Dues and Payment, Goodville Mutual Casualty Homeowners Payments, and 2022 Office Renovations

See attached Wife's 2023 Federal Income Tax Return

See attached Wife's 2023 PA Income Tax Return

See attached Wife's 2023 W2s for The Graham Company and Pennsylvania Hospital

See attached Wife's 2022 1095-C

See attached 2023 Mortgage Interest Statement Form 1098 for Mr. Cooper

See attached 2023 Mortgage Interest Statement Form 1098 for Wells Fargo

See attached Wife's Fidelity 2023 Form 5498

2. Copies of any and all business and/or partnership tax returns from businesses you have, had or may have any ownership interest from 2022 until present.

See Responses to Question #1.

3. True and correct copies of your income and earnings records from any sources of income, including but not limited to payroll stubs or wage statements, any and all commission statements issued by any employer, any and all 1099s issued by any person and/or entity for which you have performed services from January 1, 2022 to present.

See attached Responses to #1.

See attached Wife's UPHS Paystubs dated January 14, 2022 to December 30, 2022

See attached Wife's TGC Paystubs dated 2022/2023

See attached Wife's TGH/Florida Health Science Center Paystubs for 2024.

See attached Wife's UPHS Payroll Paystubs dated January 13, 2023 to November 3, 2023

See attached UPHS Paystub dated December 27, 2024.

4. A true and correct copy of the annual form issued by the Social Security Administration to you reflecting your income and payments made to Social Security during your history of employment. If not in your possession, please request from www.ssa.gov.

See attached Social Security Statement dated November 12, 2024

5. True and correct copies of any and all monthly bank statements including cancelled checks, check registries and/or stubs and deposit slips issued by any bank, savings institution, or other financial institution in which you have, had or may have any interest in and/or is in your name, individually or jointly with another person and/or entity, from January 1, 2022 to present.

See attached Wife's PNC Virtual Wallet Account #4225 Statements dated August 19, 2024 through October 31, 2024

See attached Joint PNC Performance Checking Account #3279 Statements dated December 16, 2023 through May 16, 2024 and June 18, 2024 to August 16, 2024

See attached Wife's PNC Virtual Wallet Account #4209 Statements dated August 19, 2024 through November 8, 2024

See attached Wife's Santander Accounts #7447 and #6182 Statements dated December 5, 2021 through September 30, 2024

6. True and correct copies of any and all loan applications and/or loan documents pertaining to any sums of money borrowed or to be borrowed by you individually or jointly with another person, or as a grantor from January 1, 2022 to present.

See attached Wells Fargo Mortgage #4695 Statements dated November 1, 2022, December 1, 2022, February 1, 2023, and March 1, 2023

See attached Mr. Cooper Mortgage #5894 Statement dated August 8, 2024

See attached EdFinancial Services Loan Details dated November 12, 2024 and Account History for May 26, 2020 through August 25, 2024

7. True and correct copies of any and all lease applications and/or lease documents pertaining to any lease for which you have applied and/or received, individually or jointly with another person or as guarantor from January 1, 2022 to present.

See attached Lease dated August 22, 2023.

8. True and correct copies of any and all monthly statements and/or billing statements for the car lease or loan payment relative to the vehicle(s) you currently operate along with documentation showing payment for same from January 1, 2022 to present, including but not limited to payment stubs, cancelled checks, check registrars, credit card receipts or any documents evidencing payment of same.

I do not have a car lease or loan.

9. Any and all documentation evidencing the source of funds for any and all deposits into any account which you have, had or may have any interest from January 1, 2022 to present.

See attached Paystubs and Tax Returns.

10. True and correct copies of any and all monthly credit card statements and other charge account statements (including but not limited to MasterCard, Visa, American Express, Discover, department store cards, oil and gas companies, etc.) and

supporting documentation of any and all accounts which are in your name individually or jointly with another person from January 1, 2022 to present.

I do not have any credit cards.

11. A completed Income and Expense Statement (attached hereto as “Exhibit A”) reflecting the monthly income and expenses you incur.

See attached.

12. Any and all documentation related to the monthly mortgage payment and/or monthly rent for the residence in which you currently reside or have resided, and/or for any property you have an interest in from January 1, 2022 to present, including but not limited to cancelled checks, credit card receipts, check registers, etc.

See attached Mortgage Statements and Mortgage Interest Statements

13. Any and all documentation evidencing any and all rental income, and/or payment of the mortgage secured by the residence in which you currently reside by any third party, and/or payment of any of the utilities or debt associated with the home in which you reside by any third party, including but not limited to copies of checks received and/or paid, copies of bank records evidencing deposits of same and/or any and all other documentation evidencing same, as well as the name of any third party having paid same and/or living in the home in which you reside from January 1, 2022 to present.

See attached Tax Returns and see attached Lease document.

14. Any and all documents evidencing tax-free income received by you at any time from January 1, 2022 to the present.

There are no documents evidencing tax-free income received by Wife from January 1, 2022 to the present.

15. Any and all documentation evidencing any benefits, including but not limited to, any severance and/or incentive paid and/or offered to you from your past employer from January 1, 2022 to present.

There are no documents evidencing any benefits including but not limited to any severance and/or incentive paid and/or offered to Wife from a past employer from January 1, 2022 to present.

16. Any and all life insurance policies, statements of cash value thereof and beneficiary designations from January 1, 2022 to present.

See attached MassMutual Policy #6905 Statement dated December 5, 2023 and Online Statement.

17. Any and all statements related to any investment and/or retirement account held by you, including but not limited to pension plan, profit sharing plan, 401(k), IRA, money market account, 403(b), showing the beginning balance of the account, the balance as of present or the closing of the account. Please provide statements for the preceding three (3) years.

See attached UPHS Retirement Contribution Savings Statements dated July 1, 2019 through July 31, 2019, January 1, 2022 through November 19, 2024, and July 1, 2024 through July 31, 2024.

See attached UPHS 403(b) Savings Statements dated July 1, 2019 through July 31, 2019, January 1, 2022 through November 19, 2024, and July 1, 2024 through July 31, 2024

See attached Vanguard Rollover Form dated January 4, 2019 for University of Penn Health Systems

18. List of all assets owned by you individually or jointly with another person/entity (and list the joint owner) currently and any assets in which you held an interest since January 1, 2022.

Condo, Retirement Assets, Bank Accounts.

Wife reserves the right after discovery is completed to update the list of assets.

- a. If you no longer possess an asset, provide any and all documentation relating to the sale, transfer and/ liquidation of same.

19. List of all assets owned by a corporation, partnership, limited partnership, family partnership, or other business entity in which you have, had or may have an interest in from January 1, 2022 to present and any assets in which you, through one of said business entities, held an interest in from January 1, 2022 to present which your or the business entity no longer possess.

See attached Tax Returns.

20. Copies of all corporate records, including, but not limited to, accounts payable, accounts receivable, cash records, profit and loss statements, financial statements, monthly bank statements, monthly credit card statements, names of all employees, payroll reports for all employees and owners, leasing or financing agreements (equipment, including vehicles, real property, etc.), purchase documents, loan statements, certificate of organization and operating agreement, and related documents of copies of the articles of incorporation from January 1, 2022 to present for any and all corporations you have, had or may have an interest in.

I do not have any corporate records from January 1, 2022 to the present.

21. Copies of any and all business credit card statements from January 1, 2022 to present.

I do not have any business credit card statements from January 1, 2022 to the present.

22. All financial statements prepared by you or on your behalf from January 1, 2022 to present.

I do not have any financial statements prepared by me or on my behalf from January 1, 2022 to the present.

23. True and correct copies of any and all documentation evidencing the health, dental and vision care insurance covering you, your spouse and/or your child(ren) at any time from January 1, 2022 to present, including but not limited to any and all notices of cancellation of such coverage and communications relating to and/or referring to any such coverage and/or the cancellation and/or termination of same as well as

documentation evidencing the cost associated with the coverage available and/or provided.

See attached 2022 and 2023 1095-C evidencing health, dental, and vision care insurance from January, 2022 to present.

24. Any and all documentation regarding any loans made by you or to you from January 1, 2022 to present.

I do not have any documentation regarding any loans from January 1, 2022 to present.

25. Appraisal of any real or personal property in which you have or had an interest, individually or jointly with another person and/or entity.

I do not have any appraisal of any real or personal property.

26. Any and all agreements of sale, settlement sheets and other documentation relating to the purchase, sale or refinancing of real property or business for which you have or had an interest in, individually or together with another person and/or entity, from January 1, 2022 to present.

See attached ALTA Statement dated April 15, 2022

See attached Seller's Property Disclosure dated July 18, 2024

See attached Seller's Property Disclosure Statement Addendum dated July 20, 2024

See attached Change to Listing Contract dated August 19, 2024

See attached Change to Listing Contract dated December 5, 2024.

27. Copies of the titles from any and all real property owned or leased by you, individually or jointly with another person from January 1, 2022 to present.

See attached Deed dated April 15, 2022

28. Copies of any and all lease agreements for any and all properties owned by you, individually and/or together with another person and/or entity from January 1, 2022 to present.

See attached Lease Agreement for the Condo.

29. Documentation of any and all rental income received by you and/or any business in which you have, had or may have an interest in from January 1, 2022 to present.

I do not have any documents of rental income received besides the lease for our Condo.

30. True and correct copies of Quicken records (or equivalent program) and/or check register for any entity in which you own and/or have owned an interest from January 1, 2022 to present.

I do not have any Quicken records or check register.