

**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA**  
**FAMILY COURT DIVISION**

**MELISSA BEMER :**  
Plaintiff :

DOCKET NO. 2024-007234  
CIVIL ACTION - DIVORCE

v.

**STEPHEN BOERNER :**  
Defendant, Pro Se :

**COVER LETTER, SUBMISSION**

Referenced Submission: Praeipice for Filing & Memorandum to Record

**June 24, 2025**

To the Clerk:

I am attaching a Praeipice for filing in the above-captioned matter along with the attached Memorandum to Record submitted by the Defendant, Stephen J. Boerner, Pro Se.

This document addresses procedural and ethical concerns stemming from Plaintiff's counsel's failure to file an Entry of Appearance despite initiating multiple rounds of substantive communication.

It includes direct quotes from Attorney Helen Lafferty—such as her stated intent to proceed 'expeditiously'—contrasted with subsequent communications that imposed unwarranted conditions and declined phone engagement absent a settlement proposal.

Her misrepresentation of prior emails, including selective rephrasing of language originally qualified by scheduling context, has materially distorted the record.

**To ensure full transparency and protect the record, the following exhibits are submitted:**

- Exhibit A: June 5-17, 2025 Email Chain with Helen Lafferty
- Exhibit B: May 21, 2025 Email to Carolyn Mirabile with Praeipice Notice
- Exhibit C: Filed Praeipice to Correct Address
- Exhibit D: Emails with Prior Counsel Mirabile Demonstrating Pattern of Silence
- Exhibit E: June 17, 2025 Comprehensive Attached Statement to Attorney Lafferty

Each exhibit is clearly marked and included in the order referenced above. A copy of this submission is being sent via certified mail to opposing counsel, Attorney Helen Lafferty. I respectfully request that the enclosed document be date-stamped and the stamped first page returned to me in the self-addressed stamped envelope provided.

Respectfully Submitted,

**Stephen J. Boerner**  
**Pro-Se Defendant**  
21090 W. Sharp St., Unit #132  
Rock Hall, Maryland 21661  
215-530-0545  
stephen.boerner@gmail.com