

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com) 

**Subject:** Demand Letter

**Date:** March 10, 2025 at 1:58 PM

**To:** [lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com), Juliana Martell [martell@kurfiss.com](mailto:martell@kurfiss.com), Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com)

**Cc:** Melissa [melissabemer@gmail.com](mailto:melissabemer@gmail.com), Stephen and Melissa Boerner [stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)

**Bcc:** Stephen Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

---



Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**Demand Letter - Kurfiss Sotherbys  
International Realty.pdf**





**From:** Melissa Bemer melissabemer@gmail.com  
**Subject:** Re: Demand Letter  
**Date:** March 10, 2025 at 2:57 PM  
**To:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Cc:** [lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com), Juliana Martell [martell@kurfiss.com](mailto:martell@kurfiss.com), Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com),  
Stephen and Melissa Boerner [stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)

---

Good afternoon,

I will follow-up with you all about this once I speak with my attorney.

Thanks,  
Melissa

On Mon, Mar 10, 2025 at 1:58 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Juliana Martell julianamartell@gmail.com  
**Subject:** Re: Demand Letter  
**Date:** March 10, 2025 at 2:57 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** lamarchesino@kurfiss.com, Melissa melissabemer@gmail.com, Stephen and Melissa Boerner stephenandmelissaboerner@gmail.com

---

Hi Steve,

I'm sorry to hear that you've been so unhappy with my services - I would never want anyone to feel like they have to work with me if they don't want to.

I will send a termination document shortly - once all parties sign I can remove the listings for both rent and sale.

Thank you,  
Juliana

On Mon, Mar 10, 2025 at 1:58 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:  
Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner


--

Best regards,

**Juliana Martell**, Broker Associate  
Licensed in NJ and PA

Kurfiss Sotheby's International Realty  
1631 Locust St, Suite 300  
Philadelphia, PA 19103  
215.735.2225 o  
856.366.0224 c  
[martell@kurfiss.com](mailto:martell@kurfiss.com)  
[kurfiss.com](http://kurfiss.com)  
[Learn more about me on Zillow](#)

**WARNING** – Email hacking and fraud are on the rise to fraudulently misdirect funds. Please call our office immediately to verify any wire instructions received.

**From:** Steve Boerner stephen.boerner@gmail.com   
**Subject:** Fwd: Demand Letter  
**Date:** March 10, 2025 at 4:13 PM  
**To:** Karen Oglesby Karen@cpihome.com  
**Cc:** Melissa melissabemer@gmail.com

---



Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

**- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.**

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>


Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**Demand Letter - Kurfiss Sotherbys  
International Realty.pdf**



**From:** Karen Oglesby karen@cpihome.com   
**Subject:** Re: Demand Letter  
**Date:** March 11, 2025 at 2:47 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Melissa melissabemer@gmail.com


---



Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.

 [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <karen@cpihome.com>  
**Cc:** Melissa <melissabemer@gmail.com>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**Dec 2024 Financials.pdf**







**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com) 

**Subject:** Fwd: Demand Letter

**Date:** March 13, 2025 at 4:39 PM

**To:** [dpearson@kurfiss.com](mailto:dpearson@kurfiss.com), [donald.pearson@sothebysrealty.com](mailto:donald.pearson@sothebysrealty.com)

**Cc:** Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com), [linda@kurfiss.com](mailto:linda@kurfiss.com), [lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com), [compliance@sothebysrealty.com](mailto:compliance@sothebysrealty.com), [compliance@kurfiss.com](mailto:compliance@kurfiss.com), [legal@sothebysrealty.com](mailto:legal@sothebysrealty.com), [luisa.ramondo@sothebysrealty.com](mailto:luisa.ramondo@sothebysrealty.com), [linda.krickdanese@sothebysrealty.com](mailto:linda.krickdanese@sothebysrealty.com), [legal.department@sothebysrealty.com](mailto:legal.department@sothebysrealty.com), [franchise.compliance@sothebysrealty.com](mailto:franchise.compliance@sothebysrealty.com), [legal@kurfiss.com](mailto:legal@kurfiss.com), Melissa [melissabemer@gmail.com](mailto:melissabemer@gmail.com)



Dear Mr. Chairman,

This email is very urgent and requires your attention. Relevant employees of Kurfiss Sotheby's International Realty have been cc'd.

**Please see the attached PDF titled:** Legal-Demand-Kurfiss-Sothebys-3-13-25

Thank you for your attention to this matter. I will look for responses as I suspect, and hope, your firm acts quickly.

Sincerely,

Stephen J. Boerner

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

Cc: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.


Stephen J. Boerner

**Demand Letter - Kurfiss Sothebys  
International Realty.pdf**



**Legal-Demand-Kurfiss-Sothebys-  
3.13.25.pdf**



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Fwd: Demand Letter  
**Date:** March 14, 2025 at 8:30 AM  
**To:** Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com), [linda@kurfiss.com](mailto:linda@kurfiss.com)



Dear Linda,

I have made multiple attempts to contact you, the chairman, and other representatives at your brokerage regarding my property.

Despite these efforts, I have not received any response from your team.

This lack of communication is concerning, particularly as your brokerage continues to market my property without proper authorization.

This activity may potentially violate applicable real estate regulations and my rights as the property owner.

I request a response by noon today regarding:

1. The immediate cessation of unauthorized marketing activities for my property (WITH FROM MLS IMMEDIATELY )
2. Acknowledgment of my previous communications and response address the point I wish to not repeat.

I was also going to do the courtesy of not escalating Juliana's actions of conflict of interest and the deceitful renewal practice behind the HOA board and property management company.

Regardless of your actions today, I'm running this up the ladder to all oversight organizations related to the role of realtor and the state of Pennsylvania and nationally within the National Association of Realtors (NAR).

Just please already, a response. Would be lovely.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
Date: Thu, Mar 13, 2025 at 4:39 PM  
Subject: Fwd: Demand Letter  
To: <[dpearson@kurfiss.com](mailto:dpearson@kurfiss.com)>, <[donald.pearson@sothebysrealty.com](mailto:donald.pearson@sothebysrealty.com)>  
CC: Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>, <[linda@kurfiss.com](mailto:linda@kurfiss.com)>, <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, <[compliance@sothebysrealty.com](mailto:compliance@sothebysrealty.com)>, <[compliance@kurfiss.com](mailto:compliance@kurfiss.com)>, <[legal@sothebysrealty.com](mailto:legal@sothebysrealty.com)>, <[luisa.ramondo@sothebysrealty.com](mailto:luisa.ramondo@sothebysrealty.com)>, <[linda.krickdanese@sothebysrealty.com](mailto:linda.krickdanese@sothebysrealty.com)>, <[legal.department@sothebysrealty.com](mailto:legal.department@sothebysrealty.com)>, <[franchise.compliance@sothebysrealty.com](mailto:franchise.compliance@sothebysrealty.com)>, <[legal@kurfiss.com](mailto:legal@kurfiss.com)>, Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>

Dear Mr. Chairman,

This email is very urgent and requires your attention. Relevant employees of Kurfiss Sotheby's International Realty have been cc'd.

**Please see the attached PDF titled:** Legal-Demand-Kurfiss-Sothebys-3-13-25

Thank you for your attention to this matter. I will look for responses as I suspect, and hope, your firm acts quickly.

Sincerely,

Stephen J. Boerner

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
Date: Mon, Mar 10, 2025 at 1:58 PM  
Subject: Demand Letter  
To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>  
Cc: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**Demand Letter - Kurfiss Sothebys  
International Realty.pdf**



**Legal-Demand-Kurfiss-Sothebys-  
3.13.25.pdf**



**From:** Melissa Bemer melissabemer@gmail.com  
**Subject:** Re: Demand Letter  
**Date:** March 14, 2025 at 11:51 AM  
**To:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Cc:** [lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com), Juliana Martell [martell@kurfiss.com](mailto:martell@kurfiss.com), Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com),  
Stephen and Melissa Boerner [stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)

---



Juliana, Joan and Steve,

I just submitted the docusign terminating Kurfiss services. I signed this document terminating the services for my own reasons, not for the reasons Steve identified in his demand letter sent on 3/10/25.

Thanks,  
Melissa

On Mon, Mar 10, 2025 at 2:57 PM Melissa Bemer <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)> wrote:

Good afternoon,

I will follow-up with you all about this once I speak with my attorney.

Thanks,  
Melissa

On Mon, Mar 10, 2025 at 1:58 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Fwd: Demand Letter  
**Date:** March 14, 2025 at 1:54 PM  
**To:** Juliana Martell [julianamartell@gmail.com](mailto:julianamartell@gmail.com)



Please withdraw MLS. Confirm when complete

----- Forwarded message -----

From: **Melissa Bemer** <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>

Date: Fri, Mar 14, 2025 at 11:51 AM

Subject: Re: Demand Letter

To: Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

CC: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana, Joan and Steve,

I just submitted the docusign terminating Kurfiss services. I signed this document terminating the services for my own reasons, not for the reasons Steve identified in his demand letter sent on 3/10/25.

Thanks,  
Melissa

On Mon, Mar 10, 2025 at 2:57 PM Melissa Bemer <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)> wrote:

Good afternoon,

I will follow-up with you all about this once I speak with my attorney.


Thanks,  
Melissa

On Mon, Mar 10, 2025 at 1:58 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** FW: Demand Letter  
**Date:** March 17, 2025 at 8:58 AM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com



Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Date:** Monday, March 17, 2025 at 8:55 AM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: [610.278.1524](tel:610.278.1524) M: [484.645.4602](tel:484.645.4602) F: [267.284.4337](tel:267.284.4337)  
[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.


Weber Gallagher Simpson Stapleton Fires & Newby LLP

Demand Letter - Kurfiss Sothebys  
International Realty.pdf



Legal-Demand-Kurfiss-Sothebys-  
3.13.25.pdf



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Demand Letter  
**Date:** March 17, 2025 at 10:18 AM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself."  
Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

- 1) Financial misconduct
- 2) Medical abandonment
- 3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave, Suite 206](#)

[King of Prussia, PA 19406](#)

T: 610.278.1524 M: 484.645.4602 F: 267.284.4337


[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP





**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Demand Letter  
**Date:** March 17, 2025 at 3:25 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misleading pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January, February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email in late September 2024. I can paraphrase her response as: "Go fuck yourself."  
Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

- 1) Financial misconduct
- 2) Medical abandonment
- 3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

*Send Mail to Norristown Office Only*

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave, Suite 206](#)


[King of Prussia, PA 19406](#)

T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: FW: Demand Letter  
**Date:** March 17, 2025 at 3:28 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Maria Testa, Esquire maria@tpfamilylaw.com

---

Good afternoon:

Maria has been in hearings; we will be incorporating your responses you provided into a written response to her counsel. We will keep you updated!

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Monday, March 17, 2025 3:26 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: FW: Demand Letter

Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misguiding pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January , February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing

the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself." Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

- 1) Financial misconduct

- 2) Medical abandonment

- 3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave. Suite 206](#)

[700 American Ave, Suite 400](#)

[King of Prussia, PA 19406](#)


T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Demand Letter  
**Date:** March 18, 2025 at 1:16 PM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Randi,

When will the letter be issued? Every day Melissa isn't signing the listing agreement is a day the condo is off the market. This is awful on Melissa's part to delay this

On Mon, Mar 17, 2025 at 3:28 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Good afternoon:

Maria has been in hearings; we will be incorporating your responses you provided into a written response to her counsel. We will keep you updated!

Thank you!

Randi

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 17, 2025 3:26 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misguiding pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January , February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself."

Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

1) Financial misconduct

2) Medical abandonment

3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that

being six nights out of or 100 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

### Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave, Suite 206](#)

[King of Prussia, PA 19406](#)


T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.





**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Demand Letter  
**Date:** March 18, 2025 at 1:20 PM  
**To:** Carolyn R. Mirabile cmirabile@wglaw.com  
**Cc:** Steve Boerner stephen.boerner@gmail.com

---

Hello,

Unfortunately, your client has given you information based on inaccuracies and half-truths.

For clarification, your client was aware of the Realtor situation; as there have been a series of issues with this individual, including her failure to disclose to the parties' and the condo board that she, herself, is a not only a resident in the building, but the Vice President of the Homeowners' Association. Knowing the parties' situation as the acting listing/seller's agent, she continued to issue demands in her capacity as an Association board member for past due association fees and dues, including threatening legal action. Additionally, the property sat active for over 200 days without a single offer. An obvious indication the listing was outrageously overpriced. Due to the various issues, leaving my client distrusting of this individual to represent either party's best interest, he discussed with your client the intention to disengage with this person. You stated yourself that your client received "multiple emails" so, it can be assumed that this change is not a shock to her. In fact, your client is in sole operation of the email account directly associated with the condo and its management.

Your client continues to take what she can from Mr. Boerner with no intention of reaching resolution. Her so-called proposals are insulting to my client and his current situation. Again, I must waste time correcting your client's representations to you regarding my client "living" at the property. My client has spent a total of **8 nights** at the property since it's vacancy in October 2024. Of those 8 nights, 2 of them were for his own reasoning; with the remainder being for various needs, repairs, service visits, and general upkeep of the property. Your client has been aware since late September 2024 that my client's resources were quickly depleting and by March 2025, he would no longer have the resources to financially maintain the property.

**Each day your client refuses to sign the listing agreement is another day the condo remains off market.**

Given the above and the current market temperature, I would expect this issue will be resolved very soon.

Thank you.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Date:** Monday, March 17, 2025 at 8:55 AM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are

mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

700 American Ave, Suite 206


King of Prussia, PA 19406

T: [610.278.1524](tel:610.278.1524) M: [484.645.4602](tel:484.645.4602) F: [267.284.4337](tel:267.284.4337)

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: FW: Demand Letter  
**Date:** March 18, 2025 at 1:44 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Maria Testa, Esquire maria@tpfamilylaw.com

---

We have sent a response to her counsel. We are hoping to receive a response and move this along for you.

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Tuesday, March 18, 2025 1:16 PM  
**To:** Randi Penn <randi@tpfamilylaw.com>  
**Cc:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: FW: Demand Letter

Randi,

When will the letter be issued? Every day Melissa isn't signing the listing agreement is a day the condo is off the market. This is awful on Melissa's part to delay this

On Mon, Mar 17, 2025 at 3:28 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Good afternoon:

Maria has been in hearings; we will be incorporating your responses you provided into a written response to her counsel. We will keep you updated!

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 17, 2025 3:26 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this



and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misguiding pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January, February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself." Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

coming the property and not perceived process to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

1) Financial misconduct

2) Medical abandonment

3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>  
**Date:** Monday, March 17, 2025 at 8:55 AM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn


**Carolyn R. Mirabile, Partner**

**Weber** Gallagher  
700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: 610.278.1524 M: 484.645.4602 F: 267.284.4337  
cmirabile@wglaw.com, www.wglaw.com

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Demand Letter  
**Date:** March 19, 2025 at 2:55 PM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Randi, please see the attached - my analysis of Melissa's financial disclosure, cross-referenced with timeline of events, pointing to irregularities and likely concealment of employment, concealment of income, etc. If Maria could review this detail ahead of Monday's meeting at 9am, that would be appreciated.

On Tue, Mar 18, 2025 at 1:44 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

We have sent a response to her counsel. We are hoping to receive a response and move this along for you.

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, March 18, 2025 1:16 PM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Randi,

When will the letter be issued? Every day Melissa isn't signing the listing agreement is a day the condo is off the market. This is awful on Melissa's part to delay this

On Mon, Mar 17, 2025 at 3:28 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Good afternoon:

Maria has been in hearings; we will be incorporating your responses you provided into a written response to her counsel. We will keep you updated!

Thank you!  
Randi

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 17, 2025 3:26 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misguiding pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January , February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing

- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so concerning that acting on them would be unethical

^^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself"

Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making

she never created the name and email account to coordinate her management. Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

1) Financial misconduct

2) Medical abandonment

3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

[Radnor](#)

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave, Suite 206](#)

[King of Prussia, PA 19406](#)

T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.


Weber Gallagher Simpson Stapleton Fires & Newby LLP

Financial Disclosure Analysis by  
Stephen Boerner.pdf







**From:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)   
**Subject:** RE: FW: Demand Letter  
**Date:** March 19, 2025 at 2:57 PM  
**To:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Received, thank you!

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Wednesday, March 19, 2025 2:56 PM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Randi, please see the attached - my analysis of Melissa's financial disclosure, cross-referenced with timeline of events, pointing to irregularities and likely concealment of employment, concealment of income, etc. If Maria could review this detail ahead of Monday's meeting at 9am, that would be appreciated.

On Tue, Mar 18, 2025 at 1:44 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

We have sent a response to her counsel. We are hoping to receive a response and move this along for you.

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, March 18, 2025 1:16 PM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Randi,

When will the letter be issued? Every day Melissa isn't signing the listing agreement is a day the condo is off the market. This is awful on Melissa's part to delay this

On Mon, Mar 17, 2025 at 3:28 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Good afternoon:

Maria has been in hearings; we will be incorporating your responses you provided into a written response to her counsel. We will keep you updated!

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 17, 2025 3:26 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: FW: Demand Letter

Please let me know if you held the call with Melissa's lawyer. I'm not here to tell you what to do in your job, but all I ask is you are aggressive and strong. I believe we hold the advantage and I believe Melissa is scared, resorting to lies. Melissa took the stance that she would not be paying anything towards the \$3,500 fixed costs monthly and she made that stance in since September 2024. Only NOW is she claiming she has no responsibility for that monthly tab bc she claims I "have been living there." This lawyer is getting fed lies fabrications that are baseless and this lawyer is coming to your door step with undocumented, unprovable information. That is Melissa's favorite information, baseless information. I want full attack mode, I want to leverage my disability to the maximum, and I want to point to financial misconduct, medical abandonment, a history of marital related abandonment I could fill a book with my documentation, and financial ineptitude so greedy she became a liability and incapable of being a sound mind in the dealings of this property we own together. Unilateral decisions she's made aren't warranted. But the single act I was forced to take in replacing a dirty realtor and correcting a misguiding pricing strategy was required to save and protect the marital property. I also took a bridge loan and it's written as a personal obligation non collateralized to ensure it falls under marital debt. This was for \$12,500 for float the property costs January , February, and March. Now exhausted.

On Mon, Mar 17, 2025 at 10:18 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Since October 1, 2024, I have spent eight nights at the condo during its vacancy. Two of those nights were when the Philadelphia Eagles won the Super Bowl. And six of those nights were based out of necessity such as the last three nights in which I have been here strictly to service the needs of the marital property. I've been meeting with real estate investors, advisors, real estate attorneys, I've taken the pictures that will serve as the new listings 31 photos that were removed when I fired the realtor who didn't get a single offer for 234 days and systematically overpriced our condo. The same Realtor I fired held Multiple conflicts of interest, none of which were disclosed, which is a major breach under the national association of realtors in a violation of both her code of ethics and professional Standards that realtors are held to. First of all, she lives in the same building. Second of all this Realtor serves as the vice president of the homeowners association.

On one hand, she was issuing demands for past due homeowners association, dues and threatening, legal action, and on the other hand, she was our sellers agent. This is the same sellers agent took advantage of her clients being divorced and uncommunicative as she disguised a Six month renewal contract as a \$1000 price decrease. This is all documented in how she executed sleight-of-hand to a couple that was vulnerable and expecting the thousand dollar price decrease signing documents, but was served at renewal without disclosure or transparency.

This realtor has been reported to the board and it is known that she failed to issue a conflict of interest statement to the board as well. In overseeing the marital estate, it becomes an obligation to remove her from the point person Whom we trust to sell our condo.

I had third-party hired data And individual advisors Appraise the pricing and strategy of our former realtor and in the process of sharing that data with Melissa was met with a ineptitude and unwillingness to review the information. All the data came back supporting systematic over pricing.

Melissa has only been greedy about decision-making related to the properties listing price. It became apparent to me she was inept, incapable, and unwilling to participate in proper appraisal of the information I started to share with her .

I cited State doctrine that supports me. There is financial misconduct at play and there is my Disability...

And Maria,

Drive into this lawyers skull A few key things:

- Her client has sent me three unsolicited proposals in 2025 - one of which with a timeline ultimatum they caused me undue harm and mental distress- Melissa's proposed strategy is to circumvent lawyers as she put in writing
- Melissa's proposals are so disconnected, Irrational and uneducated Throwing out proposed terms that would be detrimental to her own financial well-being- The words use in these emails are extremely elementary and so

concerning that acting on them would be unethical

^^ Proposing such terms, In the form of unsolicited proposals sent via email with the intent to Circumvent legal and then to pressure me with a time based ultimatum is extremely inappropriate and I let that be known

^^ please also note that I sent you the first proposal on February 25, 2025. For the sake of getting your information to issue a response, I won't address The lack of response to review the proposal and also my request in that same email February 25 to your assistant to a meeting for the first available opening in your schedule. I need a lawyer to catch up and act and then we will discuss

Continuing...

- her client Deepens her track record of unilateral decision-making - late September 2024, which was Pre-October 1st 2024, (The day 1 that our condo became vacant from tenants offsetting a monthly fixed cost of \$3500 required to service the condo)

I emailed Melissa in late September 2024 to remind her of this upcoming Obligation

Melissa replied to my email In late September 2024. I can paraphrase her response as: "Go fuck yourself." Although she use different words, she let it be known that her unilateral decision was to abandon financial obligation.

Since, She has remained 100% disassociated with all costs while remaining very engaged in the activities around selling the property and her perceived proceeds to come from it.

She further blocked me from a shared Gmail account we established in our marriage. Another example of an Another example of unilateral decision-making unilateral decision-making.

Much of the admin for the condo's cost obligation was managed through that email address. I have documented eight requests that I issued to her Since separation - essentially me pleading for her to share in the access that she restricted.

Even while working on financial disclosure documentation, I wrote to Melissa and told her that to help my ability to provide a thorough financial disclosure having access to that email address was imperative because that email address is the username and associated email to multiple accounts that I manage related to the condominium. Even with that reasoning, she declined To share access and only out of spite. Melissa has served as a bump on a log that shifts and positions itself in unreasonable and unpredictable ways. I had no choice but to act independently and Pennsylvania State doctrine is clear and what it supports.

To go back further regarding unilateral decision-making. I was diagnosed with a disability related to my mental health in June 2024. In July 2024, Melissa voluntarily quit her job without telling me and I began August 2024 without the medical care that took months to set up. I was not even informed by Melissa herself. It took me asking Melissa the status of her employment for her to tell me that she quit at the end of July and benefits were lost on the last day of the month that she quit.

So:

1) Financial misconduct

2) Medical abandonment

3) Complete lie about me living at the condo - I have spent eight nights here since October 1, 2024, when the condo became vacant and the tenants left

two nights were spent here for pleasure and six nights on necessity such as the last several nights as I wake up every day, servicing the property meeting with realtors and exploring creative ways to solve the issue related to our unsold Condo

.0119 % of the days since October 1, 2024 I have stayed at the condo based on non-necessity that being two nights out of 168 possible nights

.0357 % of the day since October 1, 2024 I have stayed at the condo based purely on the necessity to be here for Service repairs cleaners meeting with realtors showing the condo to real estate investors that being six nights out of 168 possible nights

On Mon, Mar 17, 2025 at 8:58 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached and below. I am SWAMPED today, but if you have time, can you please connect with Randi so I can respond?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Date:** Monday, March 17, 2025 at 8:55 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave, Suite 206](#)

[King of Prussia, PA 19406](#)


T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP



**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** FW: Demand Letter  
**Date:** March 24, 2025 at 8:49 AM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

---

Hi,

Please see below. We can discuss on our call.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Date:** Friday, March 21, 2025 at 2:31 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** RE: Demand Letter

Maria: I will address issues you raised in your email to me and reserve my client's right to argue your client has dissipated the marital estate in the divorce.

With respect to the condo, my client has met with the realtor and has signed the listing agreement. It my understanding the condo is now listed for sale. Please note, my client is reserving the right to argue the listing price is below market value but she is aware the parties need to get the condo sold. There remains outstanding HOA fees in excess of \$3,500 which your client has not paid. My client will be paying \$1,000 towards the fees and she is asking that your client to also pay \$1000 towards the outstanding fees. Additionally, for the next three months the parties shall equally divide the costs of the HOA fees moving forward.

With respect to the mortgage, my client is willing to equally divide this expense as well for the next three months. If the house does not sell in the next three months the parties will have to reassess payment of the costs.

Finally, please have your client provide a full accounting of the cryptocurrency account he depleted. I previously requested this information in discovery and have not received a response. Please also confirm your client will pay his share of the obligations for the next three months. Thank you ~ Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: [610.278.1524](tel:610.278.1524) M: [484.645.4602](tel:484.645.4602) F: [267.284.4337](tel:267.284.4337)  
[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Sent:** Tuesday, March 18, 2025 1:20 PM  
**To:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Cc:** Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Demand Letter

**EXTERNAL EMAIL**

Hello,

Unfortunately, your client has given you information based on inaccuracies and half-truths.

For clarification, your client was aware of the Realtor situation; as there have been a series of issues with this individual, including her failure to disclose to the parties' and the condo board that she, herself, is a not only a resident in the building, but the Vice President of the Homeowners' Association. Knowing the parties' situation as the acting listing/seller's agent, she continued to issue demands in her capacity as an Association board member for past due association fees and dues, including threatening legal action. Additionally, the property sat active for over 200 days without a single offer. An obvious indication the listing was outrageously overpriced. Due to the various issues, leaving my client distrusting of this individual to represent either party's best interest, he discussed with your client the intention to disengage with this person. You stated yourself that your client received "multiple emails" so, it can be assumed that this change is not a shock to her. In fact, your client is in sole operation of the email account directly associated with the condo and its management.

Your client continues to take what she can from Mr. Boerner with no intention of reaching resolution. Her so-called proposals are insulting to my client and his current situation. Again, I must waste time correcting your client's representations to you regarding my client "living" at the property. My client has spent a total of **8 nights** at the property since it's vacancy in October 2024. Of those 8 nights, 2 of them were for his own reasoning; with the remainder being for various needs, repairs, service visits, and general upkeep of the property. Your client has been aware since late September 2024 that my client's resources were quickly depleting and by March 2025, he would no longer have the resources to financially maintain the property.

**Each day your client refuses to sign the listing agreement is another day the condo remains off market.**

Given the above and the current market temperature, I would expect this issue will be resolved very soon.

Thank you.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Date:** Monday, March 17, 2025 at 8:55 AM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** FW: Demand Letter

Maria: I am sending you one of many emails my client has received regarding the sale of the condo. As a result of the emails and actions of your client the Relator is no longer the listing agent and your client has unilaterally secured a new Realtor and wants the condo price reduced significantly. He also says he is no longer paying the mortgage beginning this month even though your client has been living at the condo. Please let me know if you are



free to speak today to discuss this issue. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

700 American Ave, Suite 206

King of Prussia, PA 19406

T: [610.278.1524](tel:610.278.1524) M: [484.645.4602](tel:484.645.4602) F: [267.284.4337](tel:267.284.4337)

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Demand Letter  
**Date:** April 10, 2025 at 10:46 AM  
**To:** Karen Oglesby [Karen@cpihome.com](mailto:Karen@cpihome.com), Karen Lanetti [KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)



Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS

Chancellor Properties Inc.

P.O. Box 148

Ridley Park, PA 19078

(484) 483-2715

(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Demand Letter  
**Date:** April 16, 2025 at 5:26 PM  
**To:** Karen Oglesby [Karen@cpihome.com](mailto:Karen@cpihome.com), Karen Lanetti [KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)



Karen,

My request for minutes remains outstanding. Is there any reason they are being withheld? Please review my prior email.

On Thu, Apr 10, 2025 at 10:46 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.

If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months


Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

**Steve-**

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.

 [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS

Chancellor Properties Inc.

P.O. Box 148

Biddeford, ME 04005

Ridley Park, PA 17070

(484) 483-2715

(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply quickly over text messages with such terms being requested and as I do not hold Larry

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissaberner@gmail.com](mailto:melissaberner@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Fwd: Demand Letter  
**Date:** April 17, 2025 at 6:59 PM  
**To:** Christy@cpihome.com



Christy, Karen's email came back to me as an out of office message providing your email address. I'm forwarding the request I issued but have yet to hear back on. I'll paste my words exactly how they were written below, but you'll find the same in the emails below.

---

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.

If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
Date: Wed, Apr 16, 2025 at 5:26 PM  
Subject: Re: Demand Letter  
To: Karen Oglesby <[Karen@cpihome.com](mailto:Karen@cpihome.com)>, Karen Lanetti <[KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)>

Karen,

My request for minutes remains outstanding. Is there any reason they are being withheld? Please review my prior email.

On Thu, Apr 10, 2025 at 10:46 AM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.

If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.




On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.

 [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS

Chancellor Properties Inc.

P.O. Box 148

Ridley Park, PA 19078

(484) 483-2715

(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Sent:** Monday, March 10, 2025 4:13 PM

**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>

**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>

**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner



**From:** Karen Oglesby karen@cpihome.com  
**Subject:** Re: Demand Letter  
**Date:** April 18, 2025 at 9:36 AM  
**To:** Steve Boerner stephen.boerner@gmail.com, Karen Lanetti KLANetti@caine CPA.com



Steve-

The meeting minutes do not get distributed to the owners.

They are located on the community website at [www.cpihome.com](http://www.cpihome.com).

Go to Resident Log In- Documents.

The password is 246new. Then go to Meeting Minutes. There have not been any board meetings in 2025 other than the Annual and those minutes have not been approved yet so what you will see are the most recent which are for 2024.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Thursday, April 10, 2025 10:46 AM  
**To:** Karen Oglesby <karen@cpihome.com>; Karen Lanetti <KLANetti@caine CPA.com>  
**Subject:** Re: Demand Letter

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Demand Letter  
**Date:** April 18, 2025 at 1:47 PM  
**To:** Karen Oglesby [karen@cpihome.com](mailto:karen@cpihome.com)  
**Cc:** Karen Lanetti [KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)



When do the 2025 annual meeting minutes get approved and posted? It's been 44 days since the annual.

On Fri, Apr 18, 2025 at 9:36 AM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

The meeting minutes do not get distributed to the owners.

They are located on the community website at [www.cpihome.com](http://www.cpihome.com).

Go to Resident Log In- Documents.

The password is 246new. Then go to Meeting Minutes. There have not been any board meetings in 2025 other than the Annual and those minutes have not been approved yet so what you will see are the most recent which are for 2024.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Thursday, April 10, 2025 10:46 AM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>; Karen Lanetti <[KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)>  
**Subject:** Re: Demand Letter

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,



The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately

1. The complete 2024 materials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner



**From:** Karen Oglesby karen@cpihome.com  
**Subject:** Re: Demand Letter  
**Date:** April 18, 2025 at 1:54 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Karen Lanetti KLANetti@cainecpa.com



They are officially approved at the next Annula Meeting. However, they have been submitted to the board for review and the draft can hopefully be approved sometime in the next week or so.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Friday, April 18, 2025 1:47 PM  
**To:** Karen Oglesby <karen@cpihome.com>  
**Cc:** Karen Lanetti <KLANetti@cainecpa.com>  
**Subject:** Re: Demand Letter

When do the 2025 annual meeting minutes get approved and posted? It's been 44 days since the annual.

On Fri, Apr 18, 2025 at 9:36 AM Karen Oglesby <karen@cpihome.com> wrote:

Steve-

The meeting minutes do not get distributed to the owners.

They are located on the community website at [www.cpihome.com](http://www.cpihome.com).

Go to Resident Log In- Documents.

The password is 246new. Then go to Meeting Minutes. There have not been any board meetings in 2025 other than the Annual and those minutes have not been approved yet so what you will see are the most recent which are for 2024.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Thursday, April 10, 2025 10:46 AM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>; Karen Lanetti <[KLANetti@cainecpa.com](mailto:KLANetti@cainecpa.com)>  
**Subject:** Re: Demand Letter

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -

[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, In her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Demand Letter  
**Date:** April 18, 2025 at 1:55 PM  
**To:** Karen Oglesby [karen@cpihome.com](mailto:karen@cpihome.com)  
**Cc:** Karen Lanetti [KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)



Thank you.

On Fri, Apr 18, 2025 at 1:54 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

They are officially approved at the next Annula Meeting. However, they have been submitted to the board for review and the draft can hopefully be approved sometime in the next week or so.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Friday, April 18, 2025 1:47 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Karen Lanetti <[KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)>  
**Subject:** Re: Demand Letter

When do the 2025 annual meeting minutes get approved and posted? It's been 44 days since the annual.

On Fri, Apr 18, 2025 at 9:36 AM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

The meeting minutes do not get distributed to the owners.

They are located on the community website at [www.cpihome.com](http://www.cpihome.com).

Go to Resident Log In- Documents.

The password is 246new. Then go to Meeting Minutes. There have not been any board meetings in 2025 other than the Annual and those minutes have not been approved yet so what you will see are the most recent which are for 2024.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Thursday, April 10, 2025 10:46 AM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>; Karen Lanetti <[KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)>  
**Subject:** Re: Demand Letter

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now -



[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

Per your request, please see the below information.

Please see a link here to the ByLaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums, The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Monday, March 10, 2025 4:13 PM  
**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>  
**Cc:** Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>  
**Subject:** Fwd: Demand Letter

Karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the board's attention.

The attached demand letter issued to Juliana addresses her in her capacity as a realtor, as a realtor, and lays out the grievance in detail.

Because I must, in her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM

Subject: Demand Letter

To: <[lamarchesino@kurfiss.com](mailto:lamarchesino@kurfiss.com)>, Juliana Martell <[martell@kurfiss.com](mailto:martell@kurfiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>

CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner



**From:** stephen.boerner@gmail.com  
**Subject:** Fwd: Re: Demand Letter  
**Date:** May 6, 2025 at 9:37 AM  
**To:** Steve Boerner stephen.boerner@gmail.com



Thank you,

**Steve Boerner**

[Stephen.Boerner@gmail.com](mailto:Stephen.Boerner@gmail.com)

215.530.0545

Sent with [Spark](#)

----- Forwarded message -----

**From:** Karen Oglesby <karen@cpihome.com>

**Date:** Apr 18, 2025 at 1:54 PM -0400

**To:** Steve Boerner <stephen.boerner@gmail.com>

**Cc:** Karen Lanetti <KLanetti@cainecpa.com>

**Subject:** Re: Demand Letter

They are officially approved at the next Annula Meeting. However, they have been submitted to the board for review and the draft can hopefully be approved sometime in the next week or so.

[Karen Oglesby CMCA, AMS](#)

[Chancellor Properties Inc.](#)

[P.O. Box 148](#)

[Ridley Park, PA 19078](#)

[\(484\) 483-2715](#)

[\(866\) 287-8807 emergencies](#)

---

**From:** Steve Boerner <stephen.boerner@gmail.com>

**Sent:** Friday, April 18, 2025 1:47 PM

**To:** Karen Oglesby <karen@cpihome.com>

**Cc:** Karen Lanetti <KLanetti@cainecpa.com>

**Subject:** Re: Demand Letter

When do the 2025 annual meeting minutes get approved and posted? It's been 44 days since the annual.

On Fri, Apr 18, 2025 at 9:36 AM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

Steve-

The meeting minutes do not get distributed to the owners.

They are located on the community website at [www.cpihome.com](http://www.cpihome.com).

Go to Resident Log In- Documents.

The password is 246new. Then go to Meeting Minutes. There have not been any board meetings in 2025 other than the Annual and those minutes have not been approved yet so what you will see are the most recent which are for 2024.

[Karen Oglesby CMCA, AMS](#)

[Chancellor Properties Inc.](#)

[P.O. Box 148](#)

[Ridley Park, PA 19078](#)

[\(484\) 483-2715](#)

[\(866\) 287-8807 emergencies](#)

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

---

**Sent:** Thursday, April 10, 2025 10:46 AM

**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>; Karen Lanetti <[KLanetti@cainecpa.com](mailto:KLanetti@cainecpa.com)>

**Subject:** Re: Demand Letter

Karen,

I have not yet seen the board meeting minutes distributed from the last meeting held for all owners.

As I previously mentioned via email, I am unable to access the former joint Gmail account I once shared with Melissa, which is no longer active or accessible to me.

If the minutes were sent there, please ensure that all future correspondence is directed to the Gmail address I'm writing from now - [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)

That said, I don't believe the meeting minutes were sent out to anyone. In any case, I am formally requesting a copy of the annual board meeting minutes at this time.

I am expecting I will be able to read clearly the discussions held specifically around the delinquency topic, whether done at the annual board meeting presented to condo owners as well as delinquency discussions held prior to the annual condo wide meeting, and meetings held after discussions delinquency topic and other pertinent topics I'm interesting in reviewing in full.


If there were any board meetings held among officers outside of the annual board meeting, there should be minutes for. I am requesting all HOA related meetings that were documented with meeting minute notes to be shared from the last 12 months

Thank you.

On Tue, Mar 11, 2025 at 2:47 PM Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)> wrote:

**Steve-**

Per your request, please see the below information.

Please see a link here to the Bylaws for The Commons at New Street.  [By Laws.pdf](#). They are also on the community website and have been for years. Go to [www.cpihome.com](http://www.cpihome.com) then Resident Log In- Documents, Condominiums,

The Commons (password is 246new), Documents,

The minutes for the last meeting are not yet available.

The December 2024 financials are attached.

I sent you the new Late Fee and Interest policy last night.

Juiana Martell was re-elected to the board last week and a notice was emailed to all owners earlier today.

Let me if you have any further questions.

Karen Oglesby CMCA, AMS  
Chancellor Properties Inc.  
P.O. Box 148  
Ridley Park, PA 19078  
(484) 483-2715  
(866) 287-8807 emergencies

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Sent:** Monday, March 10, 2025 4:13 PM

**To:** Karen Oglesby <[karen@cpihome.com](mailto:karen@cpihome.com)>

**Cc:** Melissa <[melissaberner@gmail.com](mailto:melissaberner@gmail.com)>

**Subject:** Fwd: Demand Letter

karen,

I am writing to formally notify you that a demand letter (attached as a PDF, sent today) has been issued to Juliana Martell and her supervisor at Kurfiss Sotheby's International Realty.

This email formally serves as Notification to both Chancellor properties and the HOA Board of Executives for the Commons at New Street.

This action stems from Juliana's egregious undisclosed conflict of interest and her failure to disclose critical, conflicting information to the co-owners of 4CD.

Juliana currently holds dual roles: fiduciary representative on the Board of Executives for The Commons at New Street and seller's agent for condominium #4CD within the New Street Commons condominium community.

This blatant dual agency requires the boards attention.

The attached demand letter issued to Juliana addresses her in her capacity of a realtor. as a realtor and lays out the grievance in detail.

Because I must, in her role as a HOA Board member, I am putting both the Board and Chancellor Properties, on notice.

I have no evidence, nor did I seek to find it, as to whether Juliana disclosed her conflict of interest and obligation as our realtor to the HOA.

Such a conflict, especially involving delinquencies she's privy to, is untenable without full disclosure and consent from all parties.

No such disclosure occurred as it should have been given to us.

Our relationship with Juliana is terminated, effective now.

Additionally, as I've previously demanded—and I'm reiterating with urgency—send me all current documentation representing the bylaws of the governing HOA Board of Executives.

The Condo Cafe app (and web-browser portal) fails to display this information anywhere.

Board member Larry confirmed to me by-laws are not made readily available, which is unacceptable.

Further, the email announcing the upcoming annual board meeting claimed financials were attached. They were not. They were omitted.

I demand the following, and I expect compliance without delay:

1. The complete 2024 financials, forwarded to me immediately.

**- The 2024 financials that were said to be attached, but were not attached to the recent email blast regarding the recent Annual Board Meeting. They were omitted.**

2. The minutes from the most recent board meeting.

I will be dissecting the bylaws governing board member conduct, the privacy policy, and whether my personal delinquency data was properly safeguarded. I'm assuming—for now—that delinquencies are aggregated and discussed generally at meetings, with specifics restricted to board members.

The minutes and bylaws will prove or disprove this.

3. The exact verbiage and terms of the April 1, 2025 changes to delinquencies.

Note: It is not Larry's responsibility to reply casually over text message with such terms being requested and so I do not hold Larry accountable as he has been a resource that I trust, respect, and appreciate.

4. Confirmation as to Juliana's reelection as board member.

Please also refer to my previous email sent over the weekend if it went unread.

This is not a request—it's a directive.

----- Forwarded message -----

From: **Steve Boerner** <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

Date: Mon, Mar 10, 2025 at 1:58 PM


Subject: Demand Letter

To: <[lamarchesino@kurtiss.com](mailto:lamarchesino@kurtiss.com)>, Juliana Martell <[martell@kurtiss.com](mailto:martell@kurtiss.com)>, Juliana Martell <[julianamartell@gmail.com](mailto:julianamartell@gmail.com)>  
CC: Melissa <[melissabemer@gmail.com](mailto:melissabemer@gmail.com)>, Stephen and Melissa Boerner <[stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)>

Juliana & Joan,

See attached Demand Letter and respond accordingly to this urgent matter per the timelines specified within.

Stephen J. Boerner

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Entry/Withdrawal  
**Date:** May 9, 2025 at 8:46 AM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Randi Penn randi@tpfamilylaw.com

---

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

#### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Entry and Withdrawal of Appearance  
in Divorce.pdf





**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Entry/Withdrawal  
**Date:** May 9, 2025 at 9:15 AM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Hello:

Pursuant to Ms. Testa's email from earlier this morning, please see the below link to the folder containing your file with us.

 [S. Boerner File](#)

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Friday, May 9, 2025 8:46 AM  
**To:** Steve Boerner <stephen.boerner@gmail.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Entry/Withdrawal

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Steve Boerner stephen.boerner@gmail.com   
**Subject:** Re: Entry/Withdrawal  
**Date:** May 9, 2025 at 5:20 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Cc:** Randi Penn randi@tpfamilylaw.com



attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** Re: Entry/Withdrawal  
**Date:** May 9, 2025 at 7:26 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Maria Testa, Esquire maria@tpfamilylaw.com

---



Hi:

I am sorry, I do not see an attachment to your email.

Thank you,  
Randi

**RANDI DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**

325 Swede Street, Suite 201 Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner <stephen.boerner@gmail.com> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102


Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Entry/Withdrawal  
**Date:** May 11, 2025 at 4:40 AM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

---



On Fri, May 9, 2025 at 7:26 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi:

I am sorry, I do not see an attachment to your email.

Thank you,  
Randi

**RANDI DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**

325 Swede Street, Suite 201 Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road


Suite F-200

Radnor, Pennsylvania 19087

**signed-Entry and Withdrawal of  
Appearance in Divorce.pdf**  
80 KB





**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Entry/Withdrawal  
**Date:** May 12, 2025 at 7:10 AM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Maria Testa, Esquire maria@tpfamilylaw.com

---

Received, thank you.

We will process and provide you with a timestamped copy.

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Sunday, May 11, 2025 4:41 AM  
**To:** Randi Penn <randi@tpfamilylaw.com>  
**Cc:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Entry/Withdrawal

On Fri, May 9, 2025 at 7:26 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi:

I am sorry, I do not see an attachment to your email.

Thank you,  
Randi

**RANDI DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**  
325 Swede Street, Suite 201 Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Entry/Withdrawal  
**Date:** May 12, 2025 at 8:56 AM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Please let me know when all your Required actions are finalized.

Thank you, Randi.

On Mon, May 12, 2025 at 7:10 AM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Received, thank you.

We will process and provide you with a timestamped copy.

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Sunday, May 11, 2025 4:41 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Entry/Withdrawal

On Fri, May 9, 2025 at 7:26 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi:

I am sorry, I do not see an attachment to your email.

Thank you,

Randi

**RANDI DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**

[325 Swede Street, Suite 201 Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)


[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Entry/Withdrawal  
**Date:** May 12, 2025 at 12:21 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Maria Testa, Esquire maria@tpfamilylaw.com

---

Good afternoon Mr. Boerner:

We have finalized all actions. We have filed the Entry/Withdrawal, which I have attached to this email.

Additionally, we have provided you with your file via link on Friday; however, so you have everything in one location, I am also providing the link below for your access and use.

 [S. Boerner File](#)

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Sent:** Monday, May 12, 2025 8:57 AM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Subject:** Re: Entry/Withdrawal

Please let me know when all your Required actions are finalized.

Thank you, Randi.

On Mon, May 12, 2025 at 7:10 AM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Received, thank you.

We will process and provide you with a timestamped copy.

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Sunday, May 11, 2025 4:41 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Entry/Withdrawal

On Fri, May 9, 2025 at 7:26 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi:

I am sorry, I do not see an attachment to your email.

Thank you,  
Randi

**RANDI DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**  
[325 Swede Street, Suite 201 Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)


[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Entry and Withdrawal of Appearance  
in Divorce\_TS'd.pdf





**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Entry/Withdrawal  
**Date:** May 21, 2025 at 2:12 PM  
**To:** Stephen Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)



Randi, thank you for sharing.

I am following up regarding the Entry and Withdrawal of Appearance in Divorce. Has there been any response from opposing counsel or the court acknowledging or objecting to the withdrawal? Has the motion been accepted on the record?


I am also looking for any record of work performed by your firm related to the disclosure analysis—specifically, work completed and documented on evaluating the financial disclosure provided by Melissa Berner to my council at that time. There was significant billing associated with it, and I expected to see ample documentation and recorded work as part of the handoff. Please forgive me if I am overlooking it in the OneDrive file, and if I am not seeing it, kindly point it out to me.

On Mon, May 12, 2025 at 12:21 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Good afternoon Mr. Boerner:

We have finalized all actions. We have filed the Entry/Withdrawal, which I have attached to this email.

Additionally, we have provided you with your file via link on Friday; however, so you have everything in one location, I am also providing the link below for your access and use.

 [S. Boerner File](#)

Thank you,  
Randi

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Sent:** Monday, May 12, 2025 8:57 AM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

---

**Subject: Re: Entry/Withdrawal**

Please let me know when all your Required actions are finalized.

Thank you, Randi.

On Mon, May 12, 2025 at 7:10 AM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Received, thank you.

We will process and provide you with a timestamped copy.

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Sunday, May 11, 2025 4:41 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Entry/Withdrawal

On Fri, May 9, 2025 at 7:26 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi:

I am sorry, I do not see an attachment to your email.

Thank you,

Randi

**RANDI DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**

[325 Swede Street, Suite 201 Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) [LinkedIn](#)

On May 9, 2025, at 5:20 PM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

attached

On Fri, May 9, 2025 at 8:46 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hello,

In response to your letter of termination, attached please find an Entry/Withdrawal for your to complete and return. It will be filed and served on opposing counsel. We will also send you a time-stamped copy upon receipt.

In your letter, you requested your file, which will be sent to you via link shortly and coming from Randi. In terms of communications via email to opposing counsel, I believe you were copied on those communications so you have them.

If you have any trouble accessing the link, please let us know.

**Testa & Pagnanelli, LLC**

<image001[93].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087



**From:** Stephen Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Exploring Buyout Option for Philadelphia Condo  
**Date:** November 4, 2024 at 5:45 PM  
**To:** Maria Testa Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



---

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--  
Sent from [Canary](#)

**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** November 5, 2024 at 9:39 AM  
**To:** Stephen Boerner stephen.boerner@gmail.com

---



Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

#### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <stephen.boerner@gmail.com>  
**Date:** Monday, November 4, 2024 at 5:45 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Exploring Buyout Option for Philadelphia Condo



Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 2, 2024 at 7:07 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

Facebook || linkedIn

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, November 4, 2024 at 5:45 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Exploring Buyout Option for Philadelphia Condo



Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership.

I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#).

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 4, 2024 at 2:57 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

---

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage

formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 4, 2024 at 3:22 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Hello!

Please see the below link to the folder for your uploading needs.

 [Documents from Client](#)

Thank you!

**RANDI PENN-DEZII**  
PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Wednesday, December 4, 2024 2:58 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>; Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

**Testa & Pagnanelli, LLC**







[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.


Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)

**From:** Stephen Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 4, 2024 at 3:23 PM  
**To:** Maria Testa Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.

I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall , Maryland.

My parents, where I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted otherwise

--  
Sent from [Canary](#)

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to

your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market


I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#).





**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 10, 2024 at 1:43 PM  
**To:** Maria Testa Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



Hi Maria and Randi, checking if you received the below 6 days back. I'd like to set up a call for early to mid next week if possible. By then we should have Melissa's financials as this Friday was her deadline. Correct me if I'm wrong. I would like to present the terms of our positioning from my side of the family more clearly. I'm flexible please feel free to pick a 20-30 minute time slot that works for you.

On Wed, Dec 4, 2024 at 3:23 PM Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.

I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall , Maryland.

My parents, where is I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted

to facilitate and guide me on providing the most value towards the proposal without spinning my wheels on events that would go wasted otherwise

--

Sent from [Canary](#)

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

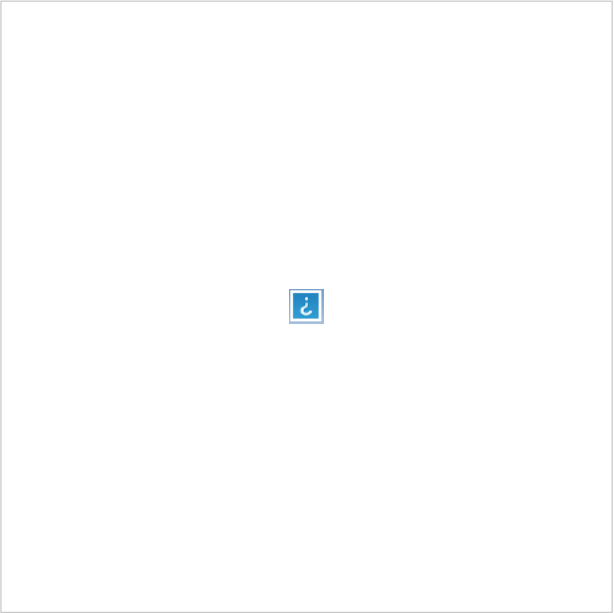
On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal

a settlement proposal is for a global settlement and not piecemeal. I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

**With Satellite Offices in:**

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

[Radnor](#)

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market


I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)





**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 10, 2024 at 4:18 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Randi Penn randi@tpfamilylaw.com

---

Hi,

There is a lot to chat about based on this email.

How about 1pm on Wednesday?

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

#### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Tuesday, December 10, 2024 at 1:43 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Hi Maria and Randi, checking if you received the below 6 days back. I'd like to set up a call for early to mid next week if possible. By then we should have Melissa's financials as this Friday was her deadline. Correct me if I'm wrong. I would like to present the terms of our positioning from my side of the family more clearly. I'm flexible please feel free to pick a 20-30 minute time slot that works for you.



On Wed, Dec 4, 2024 at 3:23 PM Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:



To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

— . . . . .

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.

I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall , Maryland.

My parents, where is I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted otherwise

--

Sent from [Canary](#)

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, December 2, 2024 at 7:08 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

## Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### *Send Mail to Norristown Office Only*

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, November 4, 2024 at 5:45 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**  
Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our

marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.


Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)

**From:** Stephen Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 11, 2024 at 8:34 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



Assuming you mean next Wednesday, the 18th. 1pm works on the 18th. Are you calling me? That is my preference. Calling from 267-312-1810? Just in case you call from your office line, I may ignore it; I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved, so it will come through.

As for the answer to the response, I guess I don't see why it took that long to just refuse everything. It's been about 2 months? We can discuss it next week. Please confirm the calling day and time. I have it on my calendar; no need for an invite. I may ignore calls since I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved so that it will come through.

As for the answer to the response, I guess I don't see why it took that long to refuse everything. It's been two months. We can discuss this next week. Please confirm the call day and time. I have it on my calendar; there is no need for an invite.

--

Sent from [Canary](#)

On Tuesday, Dec 10, 2024 at 4:18 PM, Maria Testa Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

There is a lot to chat about based on this email.

How about 1pm on Wednesday?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Tuesday, December 10, 2024 at 1:43 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Hi Maria and Randi, checking if you received the below 6 days back. I'd like to set up a call for early to mid next week if possible. By then we should have Melissa's financials as this Friday was her deadline. Correct me if I'm wrong. I would like to present the terms of our positioning from my side of the family more clearly. I'm flexible please feel free to pick a 20-30 minute time slot that works for you.

On Wed, Dec 4, 2024 at 3:23 PM Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:



To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.



I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall, Maryland.

My parents, where I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay. Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted otherwise

--

Sent from [Canary](#).

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

## Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

## ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, November 4, 2024 at 5:45 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.


Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#)



**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** December 11, 2024 at 8:39 PM  
**To:** Stephen Boerner stephen.boerner@gmail.com  
**Cc:** Randi Penn randi@tpfamilylaw.com

---



Hi,

I will be calling you from either my cell (267.312.1810) or one of the office numbers which begin with 267.239....

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <stephen.boerner@gmail.com>  
**Date:** Wednesday, December 11, 2024 at 8:34 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo



Assuming you mean next Wednesday, the 18th. 1pm works on the 18th. Are you calling me? That is my preference. Calling from 267-312-1810? Just in case you call from your office line, I may ignore it; I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved, so it will come through.

As for the answer to the response, I guess I don't see why it took that long to just refuse everything.

It's been about 2 months? We can discuss it next week. Please confirm the calling day and time. I have it on my calendar; no need for an invite. I may ignore calls since I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved so that it will come through.

As for the answer to the response, I guess I don't see why it took that long to refuse everything. It's been two months. We can discuss this next week. Please confirm the call day and time. I have it on my calendar; there is no need for an invite.

--

Sent from [Canary](#)

On Tuesday, Dec 10, 2024 at 4:18 PM, Maria Testa Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

There is a lot to chat about based on this email.

How about 1pm on Wednesday?

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Tuesday, December 10, 2024 at 1:43 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo



Hi Maria and Randi, checking if you received the below 6 days back. I'd like to set up a call for early to mid next week if possible. By then we should have Melissa's financials as this Friday was her deadline. Correct me if I'm wrong. I would like to present the terms of our positioning from my side of the family more clearly. I'm flexible please feel free to pick a 20-30 minute time slot that works for you.

On Wed, Dec 4, 2024 at 3:23 PM Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:



To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.

I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall Maryland

that and I'm staying with my parents in Rock Hill, Maryland.

My parents, where I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted otherwise

--

Sent from [Canary](#)

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:  
Hi,

We have not received her discovery; however, hers are not due for another week.

Are there documents you are sending (I presume there are)? If so, **Randi, will send you a link to upload.**

**Randi, can you please** 😊

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

##### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

##### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, December 2, 2024 at 7:08 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the lease, etc.

retirement accounts, crypto accounts, and the Jeep, etc.

## Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.


Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.

Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#).

**From:** stephen.boerner@gmail.com   
**Subject:** Fwd: Re: Exploring Buyout Option for Philadelphia Condo  
**Date:** May 6, 2025 at 9:36 AM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Thank you,

**Steve Boerner**

[Stephen.Boerner@gmail.com](mailto:Stephen.Boerner@gmail.com)

215.530.0545

Sent with [Spark](#)

----- Forwarded message -----

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Dec 11, 2024 at 8:39 PM -0500

**To:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Hi,

I will be calling you from either my cell (267.312.1810) or one of the office numbers which begin with 267.239....

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <stephen.boerner@gmail.com>

**Date:** Wednesday, December 11, 2024 at 8:34 PM

**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Cc:** Randi Penn <randi@tpfamilylaw.com>

**Subject:** Re: Exploring Buyout Option for Philadelphia Condo



Assuming you mean next Wednesday, the 18th. 1pm works on the 18th. Are you calling me? That is my preference. Calling from 267-312-1810? Just in case you call from your office line, I may ignore it; I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved, so it will come through.

As for the answer to the response, I guess I don't see why it took that long to just refuse everything. It's been about 2 months? We can discuss it next week. Please confirm the calling day and time. I have it on my calendar; no need for an invite. I may ignore calls since I get so much spam from 267, 215, and 610, and I have an app that filters out calls, so I don't even see them. I have your cell saved so that it will come through.

As for the answer to the response, I guess I don't see why it took that long to refuse everything. It's been two months. We can discuss this next week. Please confirm the call day and time. I have it on my calendar; there is no need for an invite.

--

Sent from [Canary](#)

On Tuesday, Dec 10, 2024 at 4:18 PM, Maria Testa Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

There is a lot to chat about based on this email.

How about 1pm on Wednesday?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

#### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

#### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>

**Date:** Tuesday, December 10, 2024 at 1:43 PM

**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Cc:** Randi Penn <randi@tpfamilylaw.com>

**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Hi Maria and Randi, checking if you received the below 6 days back. I'd like to set up a call for early to mid next week if possible. By then we should have Melissa's financials as this Friday was her deadline. Correct me if I'm wrong. I would like to



present the terms of our positioning from my side of the family more clearly. I'm flexible please feel free to pick a 20-30 minute time slot that works for you.

On Wed, Dec 4, 2024 at 3:23 PM Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:



To be blunt, I know she's starting from zero and to be even more blunt... I know she's working because she reactivated her nursing license on September 3, 2024 per the public records I can see

I don't have any real interest in seeking alimony or any financial gain unless you can point a specific dollars or strategy I am emotionally leaving on the table, which I am rationally open to hearing about.

And to be even more blunt she basically told me in so many words to go F myself in the one instance, I softly brought up the concept of sharing in Expenses that we carry forward together, ...

(especially the Mortgage for the Philadelphia condo property we bought during our marriage that has been on the market for 140 days. Add further this property is now on month three of mortgage owed without tenants to offset - so I have been paying all the utilities and mortgage, HOA dues of \$750/month, etc on my own )

I've also had multiple financial blows since we last spoke (Our landlord from Florida was supposed to return a \$4500 security deposit, but has broken every rule in the book deciding to keep it for himself so I am now suing him and going out of pocket with massive effort and cost - and not to go on and on but belongings I left at a friend's house in Florida such as a \$6000 golf cart that was for sale was all swept away by the hurricanes after I left roughly \$12,000 worth of belongings )

And since I didn't have my car because she took it, the cost of moving my belongings and renting a sizable enough vehicle to get it all the way back up north was very costly

I sold off all of my cryptocurrency (her lawyer's email specify this because Melissa knows how important that was to me, but it is all gone), along with having sold physical metals

and outside of a sheepish 401(k) and some private shares I bought as an accredited investor several years ago (that I very much do not want to let go of pre-IPO) there isn't much to put on paper for her to take

And a jeep grand Cherokee I bought before our marriage started so I think that technically won't count towards the pie)

That all said, I am down to dollars and cents, but remain debt free minus the mortgage.

I haven't pursued a W-2 income in fear. I would jeopardize her taking a portion of that and I'm staying with my parents in Rock Hall , Maryland.

My parents, where is I call them humbly "my roommates" have come to the table (along with one other investor) and pitched me the idea of buying out Melissa from the currently for sale condo property we own in Philadelphia that continues to have lackluster showings and drop after drop in price.

The offer we came up with is a flat \$20,000.

If we couple that offer with showing enough of my financials to illustrate the above details and we show that I've paid 95% of all costs from the initial down payment and closing cost all the way through to the recurring bills she doesn't even think of let alone pay Then I could whittle her 50% equity amount down to a number below 20,000.

Our principle is \$347,000 give or take and the purchase price was 400,000 so the equity is not high assuming an appraisal would come in around 400 which I'm confident it would even though it's listed at 435,000 currently.

If Pennsylvania starts us at 50% equally in terms of equity but allows consideration for who paid what after the fact and considering she's not paying the \$3300 per month of fixed mortgage plus HOA dues plus utilities to keep the lights on that I am paying on our mutual behalf then \$20,000 should look good.

We want to form an LLC and retain the property and the two private parking spots on an adjacent property that are likely worth more than the condo itself assuming the lot sells like many of the neighboring lots have sold in old city.

I'll spare you the strategy but we would transfer the title from Melissa and myself to an LLC with my two parents and one other investor plus myself so we would have to afford the transfer fees of \$9000 or so but everyone has agreed

Instead of spending the time of fruitlessly uploading documents for the sake of uploading documents, I thought I would put this idea here for you to ruminate and guide me on providing the most value towards this proposal without spinning my wheels on efforts that would go wasted otherwise

--  
Sent from [Canary](#).

On Wednesday, Dec 04, 2024 at 2:57 PM, Maria Testa Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

We have not received her discovery; however, hers are not  
due for another week.

Are there documents you are sending (I presume there are)?  
If so, **Randi, will send you a link to upload.**

**Randi, can you please 🙏**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

[Philadelphia](#)

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, December 2, 2024 at 7:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Exploring Buyout Option for Philadelphia Condo

Maria, I have yet to turn in my financials to you but we are yet to receive Melissa's correct?

I ask because my parents and I have aligned on a buyout proposal. We can couple it with the financial snapshot to justify the buyout proposal and ultimately a proposal to conclude the marriage formally without any more delay.

What is the best method to move forward and introduce you to the details of the condo buyout.

On Tue, Nov 5, 2024 at 9:39 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I don't see any issue with this proposal at all. But, typically, when making a settlement proposal it is for a global settlement and not piecemeal.

I am happy to let them know you would like to buy her out of the condo, but they are likely not going to agree unless and until we settle everything. There are bank accounts, retirement accounts, crypto accounts, and the Jeep, etc.

## Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, November 4, 2024 at 5:45 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Exploring Buyout Option for Philadelphia Condo

**Error! Filename not specified.**

Maria,

After discussing with my family, we're interested in exploring the possibility of buying out Melissa's share of the Philadelphia condo we purchased during our marriage. I'd like your input on whether it would be appropriate for you to make an offer on my behalf to her lawyer and, ultimately, to Melissa.

Our goal in pursuing this route is to streamline the process, avoid the complexities of discovery, and step away from any contentious stances, including potential alimony disputes. If there is resistance or we anticipate any, I believe additional discovery into the condo's funding could demonstrate that I covered 99 percent of the expenses, potentially impacting her entitlement to a full 50 percent of the current equity.

Should we move forward, we'd need a proper appraisal and extend her the opportunity to get an independent appraisal as well, establishing the current equity.


Additionally, I plan to create an LLC specifically for the purpose of transferring ownership. I'm aware that transfer taxes in Philadelphia are significant, but I have compelling reasons to retain ownership, which I'd be happy to discuss during a brief call. Also, to avoid taxes elsewhere this would be completely at the start of the new year but preferably offered and potentially agreed upon sooner than later so we could remove the condo from the for sale market

I'm available at any time this week, so please let me know a convenient time for us to talk, or feel free to call me directly.

--

Sent from [Canary](#).



**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** FW: Berner v. Boerner  
**Date:** May 1, 2025 at 3:24 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---

Hi,

Please see attached.

I presume they have not been filed?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <lbeshenich@wglaw.com>  
**Date:** Thursday, May 1, 2025 at 3:13 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>, Randi Penn  
<randi@tpfamilylaw.com>  
**Cc:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Subject:** RE: Berner v. Boerner

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

...



## Weber Gallagher

700 American Ave, Suite 206

King of Prussia, PA 19406


T: [610.278.1538](tel:610.278.1538) F: [267.284.4337](tel:267.284.4337)

[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Bemer v. Boerner  
**Date:** May 6, 2025 at 12:07 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com), Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)

---



"I presume they have not been filed?"

See attached

On Thu, May 1, 2025 at 3:24 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached.

I presume they have not been filed?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

### Radnor

150 N. Radnor Chester Road

Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com)>  
**Date:** Thursday, May 1, 2025 at 3:13 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>  
**Subject:** RE: Bemmer v. Boerner

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

**Weber Gallagher**

700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: [610.278.1538](tel:610.278.1538) F: 267.284.4337  
[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)


Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

5.6.2025-TermLetter-FINAL.pdf





**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Bemer v. Boerner  
**Date:** May 6, 2025 at 12:15 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Randi Penn randi@tpfamilylaw.com

---

Ha, ok, confirming they have not been filed. Thanks!

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On May 6, 2025, at 12:07 PM, Steve Boerner <stephen.boerner@gmail.com> wrote:

"I presume they have not been filed?"

See attached

On Thu, May 1, 2025 at 3:24 PM Maria Testa, Esquire <maria@tpfamilylaw.com> wrote:

Hi,

Please see attached.

I presume they have not been filed?

**Testa & Pagnanelli, LLC**

<image001[89].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

610.238.1000 | 215.614.6996

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com)>

**Date:** Thursday, May 1, 2025 at 3:13 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Cc:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Subject:** RE: Bemmer v. Boerner

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

**Weber Gallagher**

700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: 610.278.1538 F: 267.284.4337  
[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please

notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

[<5.6.2025-TermLetter-FINAL.pdf>](#)



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Bemer v. Boerner  
**Date:** May 9, 2025 at 7:44 AM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
**Cc:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)



What is the response regarding your next steps? There are motions to issue, no?

I don't understand your response from three days ago, which was: "Ha, ok, confirming they have not been filed. Thanks!" ... haven't heard anything other than that. Next steps?

On Tue, May 6, 2025 at 12:15 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Ha, ok, confirming they have not been filed. Thanks!

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On May 6, 2025, at 12:07 PM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

"I presume they have not been filed?"

See attached

On Thu, May 1, 2025 at 3:24 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see attached.

I presume they have not been filed?



## Testa & Pagnanelli, LLC

<image001[89].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com)>

**Date:** Thursday, May 1, 2025 at 3:13 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Cc:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>

**Subject:** RE: Bemer v. Boerner

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

**Weber Gallagher**

700 American Ave, Suite 206

King of Prussia, PA 19406


T: [610.278.1538](tel:610.278.1538) F: 267.284.4337

[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

<5.6.2025-TermLetter-FINAL.pdf>

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** FW: Bemer  
**Date:** December 11, 2024 at 8:19 AM  
**To:** Steve Boerner stephen.boerner@gmail.com

---

Hi,

Please see their very unnecessary filing. Most people never do an Answer to an answer!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <lbeshenich@wglaw.com>  
**Date:** Tuesday, December 10, 2024 at 2:12 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>, Erin Nease, Esquire <erin@tpfamilylaw.com>  
**Cc:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Subject:** FW: Bemer

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

...

## Weber Gallagher

700 American Ave, Suite 206

King of Prussia, PA 19406

T: [610.278.1538](tel:610.278.1538) F: [267.284.4337](tel:267.284.4337)

[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)


Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**Bemer Ans. -Counterclaim to Comp.  
in Divorce.pdf**



[View PDF](#)

**From:** stephen.boerner@gmail.com   
**Subject:** Fwd: FW: Bemer  
**Date:** May 6, 2025 at 9:36 AM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Thank you,

**Steve Boerner**

[Stephen.Boerner@gmail.com](mailto:Stephen.Boerner@gmail.com)

215.530.0545

Sent with [Spark](#)

----- Forwarded message -----

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Dec 11, 2024 at 8:19 AM -0500

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** FW: Bemer

Hi,

Please see their very unnecessary filing. Most people never do an Answer to an answer!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Laura A. Beshenich <lbeshenich@wglaw.com>  
**Date:** Tuesday, December 10, 2024 at 2:12 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>, Erin Nease, Esquire <erin@tpfamilylaw.com>  
**Cc:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Subject:** FW: Bemer

Hello,

Please see enclosed, thank you.

**Laura A. Beshenich, Family Law Practice Assistant**

**Weber Gallagher**

700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: 610.278.1538 F: 267.284.4337  
[lbeshenich@wglaw.com](mailto:lbeshenich@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1538.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**Bemer Ans. -Counterclaim to Comp.  
in Divorce.pdf**



**Weber**   
**Gallagher**


700 American Avenue  
Suite 206  
King of Prussia, PA 19406

☎(610) 272-5555  
☎(267) 284-4337

December 10, 2024

**VIA EMAIL** [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

Maria Testa, Esquire  
Testa & Paganelli, LLC

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** FW: Bemer/Boerner follow-up regarding mortgage  
**Date:** April 15, 2025 at 3:20 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hi,

Please see below. I am on vacation this week, but this seemed urgent. Can you confirm this is being paid, please?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <cmirabile@wglaw.com>  
**Date:** Tuesday, April 15, 2025 at 2:58 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Bemer/Boerner follow-up regarding mortgage

Maria: My client informs me that she deposited one-half of the mortgage payment into the shared account from which PNC pulls the mortgage payment. The payment is due and your client has not paid his half. Please advise this will be completed today. My client is concerned about your client's lack of response to the bills being due considering he was so aggressive when he wanted to change realtors. The parties have a three-month listing with the realtor your client chose. While the parties wait for the house to be sold, the mortgage must be paid.

Please confirm. Carolyn


**Carolyn R. Mirabile, Partner**

**Weber Gallagher**  
700 American Ave, Suite 206  
King of Prussia, PA 19406  
T: 610.278.1524 M: 484.645.4602 F: 267.284.4337  
[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: FW: Bemer/Boerner follow-up regarding mortgage  
**Date:** April 16, 2025 at 8:43 AM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



I will issue response today to you. Or should I send to Randi you assistant? Or respond direct to Melissa's lawyer?

On Tue, Apr 15, 2025 at 3:20 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Please see below. I am on vacation this week, but this seemed urgent. Can you confirm this is being paid, please?

### Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>  
**Date:** Tuesday, April 15, 2025 at 2:58 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Bemer/Boerner follow-up regarding mortgage

Maria: My client informs me that she deposited one-half of the mortgage payment into the shared account from which PNC pulls the mortgage payment. The payment is due and your client has not paid his half. Please advise this will be completed today. My client is concerned about your client's lack of response to the bills being due considering he was so aggressive when he wanted to change realtors. The parties have a three-month listing with the realtor your client chose. While the parties wait for the house to be sold, the mortgage must be paid.

Please confirm. Carolyn

**Carolyn R. Mirabile, Partner**

## Weber Gallagher

[700 American Ave, Suite 206](#)


[King of Prussia, PA 19406](#)

T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Bemer/Boerner follow-up regarding mortgage  
**Date:** April 16, 2025 at 8:45 AM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

Hi!

If you could respond to Randi, she will get it to opposing counsel.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Apr 16, 2025, at 8:43 AM, Steve Boerner <stephen.boerner@gmail.com> wrote:

I will issue response today to you. Or should I send to Randi you assistant? Or respond direct to Melissa's lawyer?

On Tue, Apr 15, 2025 at 3:20 PM Maria Testa, Esquire <maria@tpfamilylaw.com> wrote:

Hi,

Please see below. I am on vacation this week, but this seemed urgent. Can you confirm this is being paid, please?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200

---

**From:** Carolyn R. Mirabile <[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com)>  
**Date:** Tuesday, April 15, 2025 at 2:58 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Bemer/Boerner follow-up regarding mortgage

Maria: My client informs me that she deposited one-half of the mortgage payment into the shared account from which PNC pulls the mortgage payment. The payment is due and your client has not paid his half. Please advise this will be completed today. My client is concerned about your client's lack of response to the bills being due considering he was so aggressive when he wanted to change realtors. The parties have a three-month listing with the realtor your client chose. While the parties wait for the house to be sold, the mortgage must be paid.

Please confirm. Carolyn

**Carolyn R. Mirabile, Partner**

**Weber Gallagher**

[700 American Ave. Suite 206](#)


[King of Prussia, PA 19406](#)

T: 610.278.1524 M: 484.645.4602 F: 267.284.4337

[cmirabile@wglaw.com](mailto:cmirabile@wglaw.com), [www.wglaw.com](http://www.wglaw.com)

Confidentiality Note: The information contained in this electronic message may contain attorney-client privileged and confidential information intended only for the use of the owner of the email address listed as the recipient of this message. If you are not the intended recipient of this email message you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify the sender by return email; and by telephone at 610.278.1524.

Weber Gallagher Simpson Stapleton Fires & Newby LLP

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Link for Discovery  
**Date:** December 18, 2024 at 1:55 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

---

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

## Testa & Pagnanelli, LLC





325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Randi Penn randi@tpfamilylaw.com    
**Subject:** RE: Link for Discovery  
**Date:** December 18, 2024 at 3:08 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>; Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Link for Discovery  
**Date:** December 30, 2024 at 8:47 AM  
**To:** Randi Penn randi@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

### Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

#### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Randi Penn <randi@tpfamilylaw.com>  
**Date:** Wednesday, December 18, 2024 at 3:08 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>, Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)



Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>; Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)


***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087



**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Link for Discovery  
**Date:** December 30, 2024 at 9:34 AM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Mr. Boerner:

I have tried to call you a couple of times, however, I know you have protections set for incoming calls. It is important that we touch base this morning to confirm your intended disclosure for today.

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Monday, December 30, 2024 8:47 AM  
**To:** Randi Penn <randi@tpfamilylaw.com>; Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Link for Discovery

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Date:** Wednesday, December 18, 2024 at 3:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Stephen Boerner stephen.boerner@gmail.com   
**Subject:** Re: Link for Discovery  
**Date:** December 30, 2024 at 9:43 AM  
**To:** Randi Penn randi@tpfamilylaw.com  
**Cc:** Maria Testa Esquire maria@tpfamilylaw.com



I'm sending by 2pm no later sorry for delay

--  
Sent from [Canary](#)

On Monday, Dec 30, 2024 at 9:34 AM, Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Mr. Boerner:

I have tried to call you a couple of times, however, I know you have protections set for incoming calls. It is important that we touch base this morning to confirm your intended disclosure for today.

Thank you,  
Randi

**RANDI PENN-DEZII**

SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Monday, December 30, 2024 8:47 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>; Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Link for Discovery

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Date:** Wednesday, December 18, 2024 at 3:08 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!

Randi

**RANDI PENN-DEZII**

SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Sent:** Wednesday, December 18, 2024 1:55 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**





325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Link for Discovery  
**Date:** December 30, 2024 at 9:45 AM  
**To:** Stephen Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

---

Great, thanks!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <stephen.boerner@gmail.com>  
**Date:** Monday, December 30, 2024 at 9:43 AM  
**To:** Randi Penn <randi@tpfamilylaw.com>  
**Cc:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Link for Discovery



I'm sending by 2pm no later sorry for delay

--

Sent from [Canary](#)

On Monday, Dec 30, 2024 at 9:34 AM, Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:  
Mr. Boerner:

I have tried to call you a couple of times, however, I know you have protections set for incoming calls. It is important that we touch base this morning to confirm your intended disclosure for today.

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Monday, December 30, 2024 8:47 AM  
**To:** Randi Penn <randi@tpfamilylaw.com>; Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Link for Discovery

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

---

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Date:** Wednesday, December 18, 2024 at 3:08 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200


Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Steve Boerner stephen.boerner@gmail.com   
**Subject:** Re: Link for Discovery  
**Date:** December 30, 2024 at 2:55 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Randi Penn randi@tpfamilylaw.com

---



see "merged docs" folder as that combines all files in each folder to a single file. Merged docs are duplicates therefore. i'm creating a roll up dashboard, attempting to, to see the big picture easily. sorry this is a lot last minute

On Mon, Dec 30, 2024 at 9:45 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Great, thanks!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

#### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

#### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Monday, December 30, 2024 at 9:43 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery



I'm sending by 2pm no later sorry for delay

--  
Sent from [Canary](#)

On Monday, Dec 30, 2024 at 9:34 AM, Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Mr. Boerner:

I have tried to call you a couple of times, however, I know you have protections set for incoming calls. It is important that we touch base this morning to confirm your intended disclosure for today.

Thank you,  
Randi

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Monday, December 30, 2024 8:47 AM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>; Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Link for Discovery

...

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>


**Date:** Wednesday, December 18, 2024 at 3:08 PM



**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!

Randi

**RANDI PENN-DEZII**  
**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102


Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Link for Discovery  
**Date:** December 30, 2024 at 2:58 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Maria Testa, Esquire maria@tpfamilylaw.com

---

Hi:

I just looked through what you created and I am wondering if you can call me. (610) 239-1000. Since our disclosure is technically past deadline, we will want to provide this promptly and want to ensure we are only providing what you approve.

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Monday, December 30, 2024 2:56 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>; Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Link for Discovery

see "merged docs" folder as that combines all files in each folder to a single file. Merged docs are duplicates therefore. i'm creating a roll up dashboard, attempting to, to see the big picture easily. sorry this is a lot last minute

On Mon, Dec 30, 2024 at 9:45 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Great, thanks!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

---

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Stephen Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Monday, December 30, 2024 at 9:43 AM

**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Link for Discovery

I'm sending by 2pm no later sorry for delay

--

Sent from [Canary](#)

On Monday, Dec 30, 2024 at 9:34 AM, Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Mr. Boerner:

I have tried to call you a couple of times, however, I know you have  
protections set for incoming calls. It is important that we touch base this  
morning to confirm your intended disclosure for today.

Thank you,  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

From: Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Sent:** Monday, December 30, 2024 8:47 AM

**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>; Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Link for Discovery

Hi,

I hope you are well.

I just checked the link, and see you have not uploaded anything. When we spoke, I had told you that 12.30.24 was the date we agreed to exchange. Are you planning on uploading the documents today?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Date:** Wednesday, December 18, 2024 at 3:08 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** RE: Link for Discovery

Hello Mr. Boerner:

Please see the below folder for your uploading needs!

 [Discovery Documents from Husband](#)

Thank you!  
Randi

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Wednesday, December 18, 2024 1:55 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Link for Discovery

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***


With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200

Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087



**From:** Steve Boerner stephen.boerner@gmail.com   
**Subject:** Re: Link for Discovery  
**Date:** February 4, 2025 at 12:59 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Cc:** Randi Penn randi@tpfamilylaw.com

---



Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102


Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Link for Discovery  
**Date:** February 4, 2025 at 5:13 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Maria Testa, Esquire maria@tpfamilylaw.com

---

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm  
Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Cc:** Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**




325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Link for Discovery  
**Date:** February 6, 2025 at 1:12 PM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Next week is great. Please tell me options.

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm

Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102


Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)   
**Subject:** Re: Link for Discovery  
**Date:** February 6, 2025 at 1:14 PM  
**To:** Randi Penn [randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)  
**Cc:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Sorry, please schedule for **Monday (2/10) at 2pm**

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm

Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.



On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102


Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Link for Discovery  
**Date:** February 6, 2025 at 1:17 PM  
**To:** Steve Boerner stephen.boerner@gmail.com  
**Cc:** Maria Testa, Esquire maria@tpfamilylaw.com

---

Scheduled. Thank you!

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Sent:** Thursday, February 6, 2025 1:14 PM  
**To:** Randi Penn <randi@tpfamilylaw.com>  
**Cc:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Link for Discovery

Sorry, please schedule for Monday (2/10) at 2pm

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm  
Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**




325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire maria@tpfamilylaw.com   
**Subject:** Re: Link for Discovery  
**Date:** February 10, 2025 at 3:48 PM  
**To:** Steve Boerner stephen.boerner@gmail.com, Randi Penn randi@tpfamilylaw.com

---

Hi,

Thanks for chatting today.

If you could pull together the following, it would be helpful:

1. Any proof of the gold coin purchase
2. Proof of income from your business – profit/loss statements, bank statements, etc. Whatever may exist.
3. 2021 and 2022 Tax Returns
4. Any proof of the pending lawsuit

Thank you!!

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Thursday, February 6, 2025 at 1:14 PM  
**To:** Randi Penn <randi@tpfamilylaw.com>  
**Cc:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Subject:** Re: Link for Discovery

Sorry, please schedule for Monday (2/10) at 2pm

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm

Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**

SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Sent:** Tuesday, February 4, 2025 1:00 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Randi Penn randi@tpfamilylaw.com   
**Subject:** RE: Link for Discovery  
**Date:** February 10, 2025 at 5:00 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com, Steve Boerner stephen.boerner@gmail.com

---

Hello:

To aid in your uploading, I have provided the below link to the folder.

 [Documents from Client](#)

Thank you!

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Sent:** Monday, February 10, 2025 3:49 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>; Randi Penn <randi@tpfamilylaw.com>  
**Subject:** Re: Link for Discovery

Hi,

Thanks for chatting today.

If you could pull together the following, it would be helpful:

1. Any proof of the gold coin purchase
2. Proof of income from your business – profit/loss statements, bank statements, etc. Whatever may exist.
3. 2021 and 2022 Tax Returns
4. Any proof of the pending lawsuit

Thank you!!

**Testa & Pagnanelli, LLC**





325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Thursday, February 6, 2025 at 1:14 PM  
**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Sorry, please schedule for Monday (2/10) at 2pm

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm  
Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**  
SENIOR PARALEGAL

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998


[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** stephen.boerner@gmail.com   
**Subject:** Fwd: RE: Link for Discovery  
**Date:** May 6, 2025 at 9:37 AM  
**To:** Steve Boerner stephen.boerner@gmail.com



Thank you,

**Steve Boerner**

[Stephen.Boerner@gmail.com](mailto:Stephen.Boerner@gmail.com)

215.530.0545

Sent with [Spark](#)

----- Forwarded message -----

**From:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Date:** Feb 10, 2025 at 5:00 PM -0500

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** RE: Link for Discovery

Hello:

To aid in your uploading, I have provided the below link to the folder.

 [Documents from Client](#)

Thank you!

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Sent:** Monday, February 10, 2025 3:49 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>; Randi Penn  
<[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Hi,

Thanks for chatting today.

If you could pull together the following, it would be helpful:

1. Any proof of the gold coin purchase
2. Proof of income from your business – profit/loss statements, bank statements, etc. Whatever may exist.
3. 2021 and 2022 Tax Returns
4. Any proof of the pending lawsuit

Thank you!!

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Thursday, February 6, 2025 at 1:14 PM

**To:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>

**Cc:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Link for Discovery

Sorry, please schedule for **Monday (2/10) at 2pm**

On Tue, Feb 4, 2025 at 5:13 PM Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)> wrote:

Hi Steve:

Unfortunately, Maria's schedule is so hectic this week between court and conferences. I do have some availability next week if you'd like!

We have:

Monday (2/10) at 2pm

Tuesday (2/11) at 9am, 10am, or 12pm

Do any of those times work for you?

**RANDI PENN-DEZII**

**SENIOR PARALEGAL**

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Sent:** Tuesday, February 4, 2025 1:00 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Cc:** Randi Penn <[randi@tpfamilylaw.com](mailto:randi@tpfamilylaw.com)>  
**Subject:** Re: Link for Discovery

Randi, can i set up time with Maria for this week if possible. I'm flexible if you can provide a window of time.

On Wed, Dec 18, 2024 at 1:55 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can you please send a link to Mr. Boerner to upload his discovery?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:


Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor



---

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Stephen Boerner Divorce Papers  
**Date:** September 6, 2024 at 9:55 AM  
**To:** [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

---



Thanks! Attached

**Divorce - Certified Letter 1.pdf**





**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 6, 2024 at 10:13 AM  
**To:** Steve Boerner steven.boerner@gmail.com

---



Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanelli/c/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

DRIS SCANNED (fillable) copy[1].pdf



VERIFICATION BLANK.docx



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 8, 2024 at 1:15 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience: <https://secure.lawpay.com/pages/testaandpagnanelli/c/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

### **VERIFICATION**

I,        Stephen J. Boerner,        verify that the statements made in this Pleading are true and correct to  
the best of my knowledge, understanding and belief. I understand that false statements herein are made

subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

  
\_\_\_\_\_

Date: September 8th, 2024

Information Sheet-Boerner-Filled.pdf



**Payment Receipt**

**\$3,500.00**

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience: <https://secure.lawpay.com/pages/testaandpagnanellilic/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

#### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

#### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

**Information Sheet-Boerner-Filled.pdf**





**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 8, 2024 at 8:15 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second

email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Friday, September 6, 2024 at 9:56 AM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 10, 2024 at 4:30 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Date:** Sunday, September 8, 2024 at 8:15 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice

trip up here!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's

License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security

number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached



Answer and CC.docx



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 16, 2024 at 7:00 AM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanelliilc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

## **Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

~~Philadelphia~~

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached





**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 16, 2024 at 7:10 AM  
**To:** Steve Boerner stephen.boerner@gmail.com



Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <stephen.boerner@gmail.com> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

## Testa & Pagnanelli, LLC

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

## **Testa & Pagnanelli, LLC**

<image001[30].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

locate melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellilc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

## Testa & Pagnanelli, LLC

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached









**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 16, 2024 at 5:48 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Ok. Lets make it 15 minutes if you can review the attached prior it will shorten our talk. Also, tomorrow is much better for me as well and it sounds like you're busy with the kids so please feel free to continue focus on family as this is not urgent as of this evening, but it took me a while to collect my thoughts so they are now attached



MariaDraftResponse1.pdf

On Mon, Sep 16, 2024 at 6:10 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

| Maria

Hi,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:  
<https://secure.lawpay.com/pages/testaandpagnanellllc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

325 Swede Street | Suite 201 | Norristown, PA 19101

[929 Swede Street | Suite 201 | Norristown, PA 19381](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached



**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 17, 2024 at 3:40 PM  
**To:** Steve Boerner stephen.boerner@gmail.com



Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <maria@tpfamilylaw.com> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087



Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you

are having a nice trip up here!

## Testa & Pagnanelli, LLC

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form

and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@pfamilylaw.com](mailto:maria@pfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:  
<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

## **Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>  
<image002.jpg>  
<image001[62].jpg>



**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 17, 2024 at 4:48 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Date:** Tuesday, September 17, 2024 at 3:40 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<maria@tpfamilylaw.com> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998

maria@tpfamilylaw.com  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<stephen.boerner@gmail.com> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.

2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:  
<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>



**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 21, 2024 at 2:27 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Rock Hall Landing

21090 W Sharp Street, Unit #132

Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience: <https://secure.lawpay.com/pages/testaandpagnanelliilc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)



***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Friday, September 6, 2024 at 9:56 AM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

**MariaDraftResponse1.pdf**







**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 22, 2024 at 12:31 PM  
**To:** Steve Boerner stephen.boerner@gmail.com



How about Tuesday at 4?

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Saturday, September 21, 2024 at 2:28 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

.....

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

with Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

" - - - - -"

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

| L:



Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].ipq>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.

- 2 Domestic Relations Information Sheet: Please

2. Domestic Relations Information Sheet. Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanelli/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner

<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 22, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

### Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

#### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

#### Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Saturday, September 21, 2024 at 2:28 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200  
Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Date:** Tuesday, September 17, 2024 at 3:40 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087



Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Rock Hall Landing

21090 W Sharp Street, Unit #132

Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>







**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** September 22, 2024 at 7:00 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Sunday, September 22, 2024 at 4:35 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Saturday, September 21, 2024 at 2:28 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street

Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone

to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please

provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanelli/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner

<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 1, 2024 at 2:57 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

### **Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

#### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Date:** Sunday, September 22, 2024 at 7:00 PM  
**To:** Steve Boerner <stephen.boerner@gmail.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>

**Date:** Sunday, September 22, 2024 at 4:35 PM

**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>

**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Saturday, September 21, 2024 at 2:28 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087



Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below

and mailing address I've provided that address below,  
and it will serve as my mailing address moving forward.  
Please don't send any mail to my previously leased in  
Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
21090 W Sharp Street, Unit #132  
Rock Hall, MD 21661

With all that said, I just don't know how to interpret the  
request for support and what that means related to the  
divorce as a whole you mention that her filing excluded,  
a deeper dive into everything that I own, but I don't quite  
recall. It was something that you were surprised she left  
out

Anyway I would like to talk through this before making  
such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this  
morning or after 6 PM with a brief layover around 1 PM  
est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not  
sure you wanted to include. We discussed her ability to  
work and that you are between jobs (start-up and no  
paycheck since 12.23), but I didn't think you wanted to file  
for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If  
not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

325 Swede Street | Suite 201 | Norristown PA 19401

[325 Swede Street | Suite 201 | Norristown, PA 19301](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Date:** Sunday, September 8, 2024 at 8:15 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**  
<image001[30].jpg>  
[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)

[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font

size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellilic/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner

<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>





**From:** Steve Boerner [stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 1, 2024 at 3:23 PM  
**To:** Maria Testa, Esquire [maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)



Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.

On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 22, 2024 at 7:00 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 22, 2024 at 4:35 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Saturday, September 21, 2024 at 2:28 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normally hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t [610.239.1000](#) | f [215.814.8998](#)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Rock Hall Landing

[21090 W Sharp Street, Unit #132](#)

[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was



not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

### **Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**From:** Sunday, September 8, 2024 at 8:10 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

### **Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

## **Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>





**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 2, 2024 at 9:44 AM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Tuesday, October 1, 2024 at 3:23 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.



On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 22, 2024 at 7:00 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 22, 2024 at 4:35 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**

---



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Saturday, September 21, 2024 at 2:28 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Date:** Tuesday, September 17, 2024 at 3:40 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of

the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
[21090 W Sharp Street, Unit #132](#)  
[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be

attached to any pleading we file. I will send all pleadings to you to review prior to filing.

2. Domestic Relations Information Sheet:  
Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanellilc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

**From:** Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Friday, September 6, 2024 at 9:56 AM  
**To:** Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

**From:** Steve Boerner stephen.boerner@gmail.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 9, 2024 at 3:11 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com



Maria, just to confirm. Our response was issued, correct?

On Wed, Oct 2, 2024 at 9:44 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

#### Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

#### Radnor

150 N. Radnor Chester Road

150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Tuesday, October 1, 2024 at 3:23 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.

On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 22, 2024 at 7:00 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 22, 2024 at 4:35 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?



## Testa & Pagnanelli, LLC



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Saturday, September 21, 2024 at 2:28 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t [610.239.1000](#) | f [215.814.8998](#)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Rock Hall Landing

[21090 W Sharp Street, Unit #132](#)

[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed!  
If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 8, 2024 at 4:34 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

- **Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for



my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

- **Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.
2. Domestic Relations Information Sheet: Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:

<https://secure.lawpay.com/pages/testaandpagnanelliilc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>







**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 9, 2024 at 7:25 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Hi,

It has been submitted; waiting for the timestamp. Then, it will be served.

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Wednesday, October 9, 2024 at 3:12 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria, just to confirm. Our response was issued, correct?

On Wed, Oct 2, 2024 at 9:44 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Tuesday, October 1, 2024 at 3:23 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.

On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 22, 2024 at 7:00 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**





[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Sunday, September 22, 2024 at 4:35 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

**Send Mail to Norristown Office Only**

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Saturday, September 21, 2024 at 2:28 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Date:** Tuesday, September 17, 2024 at 3:40 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to

be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
[21090 W Sharp Street, Unit #132](#)  
[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed!

Otherwise, let me know if other changes are needed:  
If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner

<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry for the delay; I have been at 3 baseball games and then a new family picnic for my oldest. I will look over everything tomorrow and respond. I hope you are having a nice trip up here!

**Testa & Pagnanelli, LLC**

<image001[30].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

with Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

**From:** Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 8, 2024 at 4:34 PM  
**To:** Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Please read my last email and take a look at the three attachments.

I'm sending this second email to correct a mistake in one of those three attachments. Please ignore the form information sheet I provided you in the first email. The form information sheet had errors, as I sent you an address with typos and missed a few fields. I've corrected the form and reattached it to this second email.

I plan to change my registered residential address in early October. Between now and then, I will be spending time in Austin, Texas. I will be in Austin (and on Central Time) from September 9th to October 6th.

At that time, I fly to Rock Hall, Maryland, at which point I will register for a Driver's License change in residential address and shift from a Floridian to a state of Maryland resident until I get through this divorce. Thank you.

See the attached revised version.

Steve

On Sun, Sep 8, 2024 at 1:15 PM Steve Boerner



<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

Attached is:

**- Proof of payment screenshot.** Please confirm receipt of \$3,5000 retainer

**Information Sheet:** Your version wasn't possible to fill out. The DOB field was about a 2 in terms of font size and a very frustrating form, so I found an identical form that allowed me to fill it out. It has the same content as yours. I'm unsure if that's an issue. Let me know. I could not locate Melissa's social security number. I used to have it but can't find it.

- Also, for the employment section, I don't know if what I put was optimal for my situation, as I explained. As an entrepreneur in the startup phase, I'm unsure how the courts will view this and how to fill out forms like this. I'll look for your guidance.

**- Verification form** - added my name, signature, and date. I should be good on this one.

What else do you need from me?

On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

1. Verification: This needs to be signed and dated. This document is going to be attached to any pleading we file. I will send all pleadings to you to review prior to filing.

2. Domestic Relations Information Sheet:  
Please provide your name, address, social security number, and date of birth. Please provide the same information for the opposing party, minus their social security number if you do not have it. Please provide the name and date of birth of any children.

I am also attaching a fee agreement for your review. Once you are ready to move forward, please simply pay the fee with the payment link provided and I can begin. Here is the payment link for your convenience:  
<https://secure.lawpay.com/pages/testaandpagnanellillc/operating>

My cell is 267.312.1810, so you have it.

If you have any questions, please let me know!

Thank you!

**Testa & Pagnanelli, LLC**

<image001[62].jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner

[<stephen.boerner@gmail.com>](mailto:stephen.boerner@gmail.com)

**Date:** Friday, September 6, 2024 at 9:56 AM

**To:** Maria Testa, Esquire

[<maria@tpfamilylaw.com>](mailto:maria@tpfamilylaw.com)

**Subject:** Stephen Boerner Divorce Papers

Thanks! Attached

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

**From:** Steve Boerner stephen.boerner@gmail.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 11, 2024 at 3:17 PM  
**To:** Maria Testa, Esquire maria@tpfamilylaw.com

---



Dear Maria,

I hope you're doing well. I wanted to provide some updates on recent developments with Melissa and seek your guidance on several matters. Additionally, seeking a copy of our response.

1. Request for Copy of Our Legal Response

- Could you please share a copy of our legal response to Melissa's initial divorce filing (our Answer and any Counterclaims)? I'd like to review it for my records.
- I understand the ball is in her court now. Could you provide an estimated timeline for their response? This would help me mentally prepare for this phase and alleviate some stress during the waiting period.

2. Communication via Lawyer

- Melissa has demanded that I cease all direct communication with her and route all interactions through her lawyer.
- Initially, we agreed to work together amicably to close out accounts and address loose ends, but this has changed.

3. Verizon Account

- Melissa, as the primary holder of our joint Verizon Wireless account, initiated splitting the account.
- I assisted by joining the call with Verizon and providing any necessary two-factor authentication codes, fulfilling our prior agreement.

#### 4. PECO Energy Account and Condo Preparations

- Our tenants moved out at the end of September from our jointly owned condo.
- I transferred the PECO energy account into my name to ensure we have power for open houses and showings.
- Melissa delayed providing a two-factor authentication code needed for the transfer, resulting in about a week without power at the condo, which hindered repair work and preparations.
- She eventually provided the necessary information, but the delay caused significant inconvenience.

#### 5. Access to Joint Gmail Account

- We have a joint Gmail account ([stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)) used for shared utilities and subscriptions.
- Melissa set up the account through her phone, and I cannot access it without a two-factor authentication code sent to her device.
- She has ignored multiple requests to grant me access to this mutually owned account.
- Since she insists on all communication going through her

lawyer, I'm unable to resolve this directly with her.

- Attachments: Screenshots documenting these issues.

## 6. Mortgage and HOA Contributions

- Melissa has decided not to contribute to the monthly mortgage payments starting October 2024—the first month without tenants in our condo.
- The monthly mortgage is approximately \$2,400, including around \$530 in escrow for Philadelphia property taxes.
- Additionally, there are HOA dues of approximately \$800 per month.
- I have made the October mortgage and HOA payments in full without any contribution from her.
- Back on July 17, 2024, she stated in a text message that she expects a fair split of the condo proceeds, yet currently, I'm shouldering all the expenses.
- Attachments: Screenshots of payments and the aforementioned text message.

## 7. Financial Strain and Impact on Business

- Covering these expenses alone is depleting my cash reserves.
- This financial strain is significantly hindering my ability to focus on my startup and generate revenue.

## Questions and Requests

## 1. Documentation Guidance

- To what extent should I be documenting these financial contributions and communication issues?
- Should I include these expenses in the financial summary in response to what they will send us, given that I am currently covering these payments alone?

## 2. Joint Gmail Account Access

- Is there any action we can take regarding Melissa's refusal to share access to our joint Gmail account? This hinders my ability to manage our shared responsibilities.

## 3. Shared Expenses

- What can be done about Melissa's lack of contribution to shared expenses, given our mutual ownership of the property?

## 4. Relevance of Attachments

- Please advise if the attached screenshots will be relevant in the broader scheme of things.

Thank you for your assistance. I appreciate your guidance on these matters and look forward to your response.

Best regards,

Stephen

On Wed, Oct 9, 2024 at 7:25 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It has been submitted; waiting for the timestamp. Then, it will be served.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)



[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Wednesday, October 9, 2024 at 3:12 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria, just to confirm. Our response was issued, correct?

On Wed, Oct 2, 2024 at 9:44 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

Facebook | LinkedIn

---

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Tuesday, October 1, 2024 at 3:23 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.

On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 22, 2024 at 7:00 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 22, 2024 at 4:35 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct?  
I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

### **Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Saturday, September 21, 2024 at 2:28 PM

**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

[325 Swede Street](#) | [Suite 201](#) | [Norristown, PA 19401](#)

t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

[Philadelphia](#)

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

[Radnor](#)



[150 N. Radnor Chester Road](#)

[Suite F-200](#)

[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner

Rock Hall Landing

[21090 W Sharp Street, Unit #132](#)

[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

1515 Market Street

Suite 1200

Philadelphia, PA 19102

Radnor

150 N. Radnor Chester Road

Suite F-200

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Sunday, September 8, 2024 at 8:15 PM

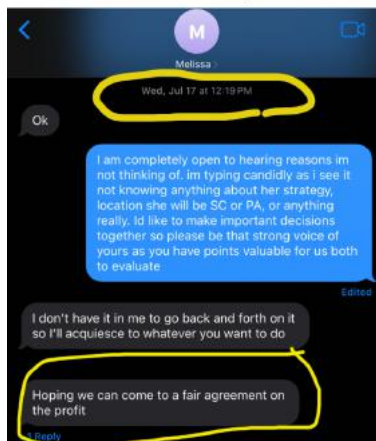
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

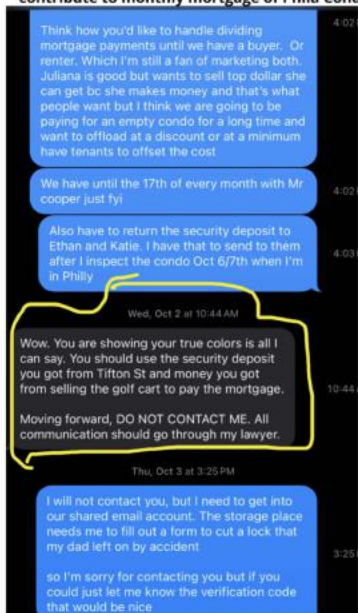
**July 17th, 2024**

**Melissa states desire for fair  
division of condo proceeds**



## October 2nd, 2024

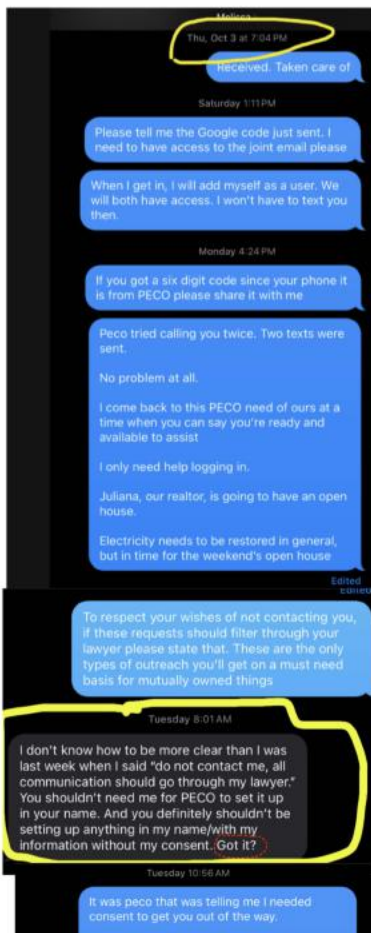
Melissa gives illogical reason to not contribute to monthly mortgage of Phila Condo.



## October 3rd, 2024

Melissa gives remains unwilling to provide access to share family Gmail account.

Provides unreasonable indtruction to communicate with her lawyer related to a matter-of-fact, emotionless request for her to allow me in to account



Similar to Verizon, you needed the same response from me. You completed that task. It was completely as a result of one party taking the lead, and the other party complying to assist.

It's not logical to block these things. An open house is this weekend. Power is needed to prepare.

Fair reminder, nothing will ever be set up in your name without your consent. Was never, is never, my intent.

Do I "got it?"

Yes. "It" I do got.

Power, however, in a home with your name on it equally to mine, no not yet. I will get around the barrier of you, however, to power the home, repair the home, deal with the mortgage independently of you, per your denial to contribute, on my own, so on, and so on.

In addition, in parallel to this, we have a joint Gmail. I've asked for my access. You've denied me of that. This makes efforts more difficult.

Let the record show, and it does, and it will, these course of events

In addition, in parallel to this, we have a joint Gmail. I've asked for my access. You've denied me of that. This makes efforts more difficult.

Let the record show, and it does, and it will, these course of events

Edited

With the saddest of hearts, with so so much sadness, this will be my forever and final last text message to you...my love, my muse, forever, regardless, in my heart.

You will never hear from me ever again.

I can help with PECO as you did Verizon that is fine. Do you want to call them now?

**From:** Maria Testa, Esquire maria@tpfamilylaw.com  
**Subject:** Re: Stephen Boerner Divorce Papers  
**Date:** October 13, 2024 at 4:14 PM  
**To:** Steve Boerner stephen.boerner@gmail.com

---



Good Morning,

I hope you are having a nice weekend.

It was best to respond in kind below; please see my responses!

## Testa & Pagnanelli, LLC



325 Swede Street | Suite 201 | Norristown, PA 19401  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

### ***Send Mail to Norristown Office Only***

#### With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <stephen.boerner@gmail.com>  
**Date:** Friday, October 11, 2024 at 3:17 PM  
**To:** Maria Testa, Esquire <maria@tpfamilylaw.com>  
**Subject:** Re: Stephen Boerner Divorce Papers

Dear Maria,

I hope you're doing well. I wanted to provide some updates on recent developments with Melissa and seek your guidance on several matters. Additionally, seeking a copy of our response.

1. Request for Copy of Our Legal Response

- Could you please share a copy of our legal response to Melissa's initial divorce filing (our Answer and any Counterclaims)? I'd like to review it for my records.

Hi, it is the same document I sent to you for review prior to filing! The time-stamped version is attached or your records.

- I understand the ball is in her court now. Could you provide an estimated timeline for their response? This would help me mentally prepare for this phase and alleviate some stress during the waiting period.

They do not need to file a response; you did an Answer to her divorce. The next thing is to do discovery; the request for documents. Once requested, there is a 30 day period for which to provide them.

2. Communication via Lawyer

- Melissa has demanded that I cease all direct communication with her and route all interactions through her lawyer.

That is unreasonable and unnecessarily costly. You have no obligation to adhere to that demand.

- Initially, we agreed to work together amicably to close out accounts and address loose ends, but this has changed.

3. Verizon Account

- Melissa, as the primary holder of our joint Verizon Wireless account, initiated splitting the account.
- I assisted by joining the call with Verizon and providing any necessary two-factor authentication codes, fulfilling our prior agreement.

#### 4. PECO Energy Account and Condo Preparations

- Our tenants moved out at the end of September from our jointly owned condo.
- I transferred the PECO energy account into my name to ensure we have power for open houses and showings.
- Melissa delayed providing a two-factor authentication code needed for the transfer, resulting in about a week without power at the condo, which hindered repair work and preparations.
- She eventually provided the necessary information, but the delay caused significant inconvenience.

#### 5. Access to Joint Gmail Account

- We have a joint Gmail account ([stephenandmelissaboerner@gmail.com](mailto:stephenandmelissaboerner@gmail.com)) used for shared utilities and subscriptions.
- Melissa set up the account through her phone, and I cannot access it without a two-factor authentication code sent to her device.
- She has ignored multiple requests to grant me access to this mutually owned account.
- Since she insists on all communication going through her



lawyer, I'm unable to resolve this directly with her.

- Attachments: Screenshots documenting these issues.

## 6. Mortgage and HOA Contributions

- Melissa has decided not to contribute to the monthly mortgage payments starting October 2024—the first month without tenants in our condo.
- The monthly mortgage is approximately \$2,400, including around \$530 in escrow for Philadelphia property taxes.
- Additionally, there are HOA dues of approximately \$800 per month.
- I have made the October mortgage and HOA payments in full without any contribution from her.
- Back on July 17, 2024, she stated in a text message that she expects a fair split of the condo proceeds, yet currently, I'm shouldering all the expenses.
- Attachments: Screenshots of payments and the aforementioned text message.

## 7. Financial Strain and Impact on Business

- Covering these expenses alone is depleting my cash reserves.
- This financial strain is significantly hindering my ability to focus on my startup and generate revenue.

## Questions and Requests

### 1. Documentation Guidance

- To what extent should I be documenting these financial contributions

and communication issues?

The condo was not used as the marital residence, so you will have an argument for a credit for what you paid. But, if it is too much, then perhaps listing it for sale makes sense?

I would like proof of payments you make towards the condo, so we have it for the credit request.

- Should I include these expenses in the financial summary in response to what they will send us, given that I am currently covering these payments alone?

Yes, you should.

## 2. Joint Gmail Account Access

- Is there any action we can take regarding Melissa's refusal to share access to our joint Gmail account? This hinders my ability to manage our shared responsibilities.

Yes, we can certainly request the information. Or, since you are managing the property, you could create a new email address that she cannot use. Is that an option?

## 3. Shared Expenses

- What can be done about Melissa's lack of contribution to shared expenses, given our mutual ownership of the property?

You are divorcing and you did not reside in this residence, so there is no presumption you should share the expenses. Therefore, most people would either re-rent the property or list it for sale. She cannot be forced to share in these expenses.

## 4. Relevance of Attachments

- Please advise if the attached screenshots will be relevant in the broader scheme of things.

They are relevant to show she would not pay for the condo. I don't think the fact that she won't communicate with you other than through attorney's is needed other than to show she

won't do it.

Thank you for your assistance. I appreciate your guidance on these matters and look forward to your response.

Best regards,

Stephen

On Wed, Oct 9, 2024 at 7:25 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

It has been submitted; waiting for the timestamp. Then, it will be served.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Wednesday, October 9, 2024 at 3:12 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria, just to confirm. Our response was issued, correct?

On Wed, Oct 2, 2024 at 9:44 AM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

---

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Date:** Tuesday, October 1, 2024 at 3:23 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Maria,

Both days are free in the afternoon. Thanks for your patience lately. I'm mentally getting back in the saddle. You pick the time on either day. Please have a calendar invite shared with and I'll look for a call at that time.

On Tue, Oct 1, 2024 at 1:57 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Date:** Sunday, September 22, 2024 at 7:00 PM  
**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Yes, we have time to reply! You have not even technically accepted service of the complaint! I will do so once we speak.

I will speak with you on Tuesday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Sunday, September 22, 2024 at 4:35 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

ok. tuesday 4pm EST/3pm CST. That works. Also, I'm assuming we're in the window of allotted response time to Melissa's attorney, correct? I assume so, just checking to feel good about it

On Sun, Sep 22, 2024 at 11:31 AM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

How about Tuesday at 4?

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t 610.239.1000 | f 215.814.8998  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
Radnor, Pennsylvania 19087

**From:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>  
**Date:** Saturday, September 21, 2024 at 2:28 PM  
**To:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>  
**Subject:** Re: Stephen Boerner Divorce Papers

Hi Maria, can we try again tomorrow or Tuesday to connect so we can get our response to their filing in line with the details attached (and under your council so I feel good about the strategy to respond aggressively)

Please take a look at what I originally meant to share with you - a timeline of some topics I think

On Tue, Sep 17, 2024 at 3:48 PM Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

I tried you at 4 and left a VM.

I don't have time tomorrow for a call, but I can chat Thursday.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)>

**Date:** Tuesday, September 17, 2024 at 3:40 PM

**To:** Steve Boerner <[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)>

**Subject:** Re: Stephen Boerner Divorce Papers

Hi,

I will call at 4:05; I am running a little behind.

**Testa & Pagnanelli, LLC**



[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)  
[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Radnor  
150 N. Radnor Chester Road  
Suite F-200  
Radnor, Pennsylvania 19087

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:10 AM, Maria Testa, Esquire  
<[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Based on your email, you're really only available before 10am within normal hours and I have a hearing beginning at 9 this am. I will be with my client beforehand.

I can chat at 6, but since I will be with my children and running them around, I can offer 30 minutes. I hope that works.

I will call you then.

**Testa & Pagnanelli, LLC**

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)  
t [610.239.1000](tel:610.239.1000) | f [215.814.8998](tel:215.814.8998)

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)  
<https://www.tpfamilylaw.com/>  
[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia  
[1515 Market Street](#)  
[Suite 1200](#)  
[Philadelphia, PA 19102](#)

Radnor  
[150 N. Radnor Chester Road](#)  
[Suite F-200](#)  
[Radnor, Pennsylvania 19087](#)

Sent from my iPhone, please excuse typos and grammatical errors

On Sep 16, 2024, at 7:01 AM, Steve Boerner  
<[stephen.boerner@gmail.com](mailto:stephen.boerner@gmail.com)> wrote:

Maria,

I've been struggling to decide what the best course of action is. I think it would be helpful if we could talk about this further. I'm available via my cell phone today, but I'm also traveling and have flight details below.

Tomorrow might be a better time to talk, but I'd like to find a way to speak as soon as possible. I'm trying to be flexible and can make time today.

One important point is that she wants me to pay for her expensive lawyer at the end of this. However, I've already spent thousands of dollars on car rental and transportation services for myself and my service dog, who supports my PTSD. The PTSD was triggered by a home invasion in Gulfport, Florida, on March 26, 2024, when I had a physical altercation with an intruder

When I had a physical altercation with an intruder in our home while trying to protect our family.

As of this morning, Friday, September 13, 2024, and almost two months since she took the Jeep with the intention of keeping it, I'll be picking it up and taking it to a service station so McKenna can fix the wear and tear that has accumulated during her cross-country drives since then.

I've had to rent almost four cars to make ends meet, and I also had to rent a large moving SUV that cost over \$2000 to move her belongings and mine out of the home we rented together in Gulfport, Florida. She left me alone to handle all of this on my own.

As of this morning, I've arrived in the northeast with the belongings I could salvage and my service dog. We have a place to stay in Austin, Texas, until October 6, 2024, when I'll return to the Philadelphia area. At that time, I'll collect the Jeep that's going to be serviced while I'm away and drive it to Rock Hall, Maryland.

My parents have kindly allowed me to use their mostly vacant retirement condo as my next residential address and mailing address. I've provided that address below, and it will serve as my mailing address moving forward. Please don't send any mail to my previously leased in Gulfport, Florida.

Stephen Boerner  
Rock Hall Landing  
[21090 W Sharp Street, Unit #132](#)  
[Rock Hall, MD 21661](#)

With all that said, I just don't know how to interpret the request for support and what that means related to the divorce as a whole you mention that her filing excluded, a deeper dive into everything that I own, but I don't quite recall. It was something that you were surprised she left out

Anyway I would like to talk through this before making such a pivotal decision.

215 530 0545

Steve

ps... I am available on my cell phone before 10 AM this morning or after 6 PM with a brief layover around 1 PM est

On Tue, Sep 10, 2024 at 4:30 PM Maria Testa, Esquire <[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)> wrote:

Hi,

Attached is the drafted Answer and Counterclaim.

For the counter-claim, I highlighted the two counts I was not sure you wanted to include. We discussed her ability to work and that you are between jobs (start-up and no paycheck since 12.23), but I didn't think you wanted to file for support. I put them in there and can remove them.

Otherwise, let me know if other changes are needed! If not, confirm I can file!

**Testa & Pagnanelli, LLC**

<image002.jpg>

[325 Swede Street | Suite 201 | Norristown, PA 19401](#)

t 610.239.1000 | f 215.814.8998

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

<https://www.tpfamilylaw.com/>

[Facebook](#) | [LinkedIn](#)

***Send Mail to Norristown Office Only***

With Satellite Offices in:

Philadelphia

[1515 Market Street](#)

[Suite 1200](#)

[Philadelphia, PA 19102](#)

Radnor

[150 N. Radnor Chester Road](#)

[Suite F-200](#)

Radnor, Pennsylvania 19087

**From:** Maria Testa, Esquire

[maria@tpfamilylaw.com](mailto:maria@tpfamilylaw.com)

[<maria@tpramilylaw.com>](mailto:maria@tpramilylaw.com)

**Date:** Sunday, September 8, 2024 at 8:15 PM

**To:** Steve Boerner

[<stephen.boerner@gmail.com>](mailto:stephen.boerner@gmail.com)

**Subject:** Re: Stephen Boerner Divorce Papers

Hey Steve,

10.9.24 Answer to Plaintiffs  
Complaint in Divorce Counter Claim...

