

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

PRAECIPE FOR FILING MEMORANDUM TO RECORD

MELISSA BEMER :
Plaintiff :

DOCKET NO. 2024-007234
CIVIL ACTION - DIVORCE

v.

STEPHEN BOERNER :
Pro Se Defendant

June 24, 2025

To the Clerk of the Family Court:

Kindly file the attached Memorandum to supplement the record in the above-captioned matter. This memorandum documents timeline irregularities and procedural concerns related to communications from Attorney Helen Haney Lafferty, who on June 5, 2025, stated via email:

"Our firm has taken over representation of your wife, Melissa Bemer, with regard to your divorce matter. We will be entering our appearance in the matter..."

As of the date of this filing (June 24, 2025), no formal Entry of Appearance has been recorded in the Delaware County docket (CV-2024-007234) on behalf of Attorney Lafferty or her firm, Klehr Harrison Harvey Branzburg LLP.

Respectfully Submitted,

Stephen J. Boerner
Pro-Se Defendant
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June 24, 2025