From: Steve Boerner stephen.boerner@gmail.com

Subject: Stephen Boerner Divorce Papers
Date: September 6, 2024 at 9:55 AM
To: 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 stephen.boerner@gmail.com

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Thank you!

Testa & Pagnanelli, LLC



Send Mail to Norristown Office Only

With Satellite Offices in:

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1515 Market Street Suite 1200 Philadelphia, PA 19102

Radnor 150 N. Rad

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

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DRIS SCANNED (fillable) copy[1].pdf





From: Steve Boerner 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



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.

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VERIFICATION

I, Stephen J. Boerner, verify that the statements made in this Pleading are true and correct to

subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

512h

Date: September 8th, 2024

Information Sheet-Boerner-Filled.pdf





From: Steve Boerner 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



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Subject: Stephen Boerner Divorce Papers

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From: Steve Boerner stephen.boerner@gmail.com
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Date: September 16, 2024 at 7:00 AM

To: Maria Testa, Esquire maria@tpfamilylaw.com



Maria,

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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.

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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

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Hi,

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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.

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- Verification form added my name, signature, and date. I should be good on this one.

What else do you need from me?

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Subject: Re: Stephen Boerner Divorce Papers

Date: September 16, 2024 at 5:48 PM

To: Maria Testa, Esquire 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

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<image002.jpg>

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Date: September 21, 2024 at 2:27 PM

To: Maria Testa, Esquire maria@tpfamilylaw.com



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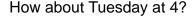
MariaDraftResponse1.pdf



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



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t 610.239.1000 | f 215.814.8998 maria@tpfamilylaw.com

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Suite 1200
Philadelphia, PA 19102

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<stephen.boerner@gmail.com>

Date: Friday, September 6, 2024 at 9:56 AM

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

Publicati Ctanhan Daarnar Divaraa Danara

	Subject: Stepnen Boerner Divorce Papers
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Rock Hall, MD 21661

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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

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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

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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.

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Stephen Boerner Rock Hall Landing 21090 W Sharp Street, Unit #132 Rock Hall, MD 21661

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215 530 0545

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Testa & Pagnanelli, LLC <image002.jpg>

325 Swede Street | Suite 201 | Norristown PA 19401

<u>020 011000 011001 | 04110 201 | 1101110101111, 171 1040 |</u>

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To: Maria Testa, Esquire < <u>maria@tpfamilylaw.com</u>> **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> 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> 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.
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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

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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

<image001[30].jpg>

<image002.jpg>

<image001[62].jpg>

From: Steve Boerner 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



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.

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When can you chat Thursday or Friday?

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I will speak with you on Tuesday.

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How about Tuesday at 4?

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From: Steve Boerner <<u>stephen.boerner@gmail.com</u>>

Date: Saturday, September 21, 2024 at 2:28 PM

To: Maria Testa, Esquire <<u>maria@tpfamilylaw.com</u>>

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 > wrote:

Hi,

I tried you at 4 and left a VM.

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<image001[30].jpg>

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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!

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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/
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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 Gultport, 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> 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>

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maria@tpfamilylaw.com

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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 foe 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>

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Philadelphia, PA 19102

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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 < <u>maria@tpfamilylaw.com</u>> **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 > 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 > 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>

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maria@tpfamilylaw.com

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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

<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 > wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

Testa & Pagnanelli, LLC



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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 > wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

Testa & Pagnanelli, LLC



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maria@tpfamilylaw.com

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Suite F-200

Radnor, Pennsylvania 19087

From: Maria Testa, Esquire <<u>maria@tpfamilylaw.com</u>>
Date: Sunday, September 22, 2024 at 7:00 PM
To: Steve Boerner <<u>stephen.boerner@gmail.com</u>>
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





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Suite F-200

Radnor, Pennsylvania 19087

From: Steve Boerner <<u>stephen.boerner@gmail.com</u>>
Date: Sunday, September 22, 2024 at 4:35 PM
To: Maria Testa, Esquire <<u>maria@tpfamilylaw.com</u>>
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 > wrote:

How about Tuesday at 4?

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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 > 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



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Suite F-200

Radnor, Pennsylvania 19087

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

Date: Tuesday, September 17, 2024 at 3:40 PM

To: Steve Boerner <<u>stephen.boerner@gmail.com</u>>

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 <u>610.239.1000</u> | f <u>215.814.8998</u>

maria@tpfamilylaw.com

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Sent from my iPhone, please excuse typos and grammatical errors

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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 I will call you then. Testa & Pagnanelli, LLC 325 Swede Street | Suite 201 | Norristown, PA 19401 t <u>610.239.1000</u> | f <u>215.814.8998</u> maria@tpfamilylaw.com https://www.tpfamilylaw.com/ Facebook LinkedIn Send Mail to Norristown Office Only With Satellite Offices in: <u>Philadelphia</u> 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

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Maria,

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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.

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Rock Hall Landing

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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.

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<image002.jpg>

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Date: Sunday, September 8, 2024 at 8:15 PM
To: Steve Boerner <<u>stephen.boerner@gmail.com</u>>
Subject: Re: Stephen Boerner Divorce Papers

Hey Steve,

I am sorry foe 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>

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Radnor
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<u>Suite F</u> -200
Radnor, Pennsylvania 19087
From: Steve Boerner < stephen.boerner@gmail.com>
Date: Sunday, September 8, 2024 at 4:34 PM To: Maria Testa, Esquire < <u>maria@tpfamilylaw.com</u> >
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.
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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.
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Maria,
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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

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 What else do you need from me? On Fri, Sep 6, 2024 at 10:13 AM Maria Testa, Esquire < maria@tpfamilylaw.com > wrote: 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

my situation, as I explained. As an entrepreneur in the startup phase, I'm

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 < <u>maria@tpfamilylaw.com</u>> **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



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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> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

Testa & Pagnanelli, LLC



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From: Steve Boerner < stephen.boerner@gmail.com >

Date: Tuesday, October 1, 2024 at 3:23 PM

To: Maria Testa, Esquire < <u>maria@tpfamilylaw.com</u>> **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> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

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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

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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> wrote:

How about Tuesday at 4?

Testa & Pagnanelli, LLC



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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 > 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

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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.

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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.

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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.

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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> 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!

Unletwise, let the know it other changes are needed: If not, confirm I can file!

Testa & Pagnanelli, LLC

<image002.jpg>

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t 610.239.1000 | f 215.814.8998

maria@tpfamilylaw.com

https://www.tpfamilylaw.com/

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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 foe 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>

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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> 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 > wrote:

Hi,

It was such a pleasure chatting.

As discussed, I have attached the documents needed for filing. The documents are as follows:

 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

<image 001 [62].jpg>
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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
<image001 <image002 <image001< td=""><td>.jpg></td></image001<></image002 </image001 	.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

1

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 (<u>stephenandmelissaboerner@gmail.com</u>) 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
ı	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 > wrote:

Hi,

It has been submitted; waiting for the timestamp. Then, it will be served.

Testa & Pagnanelli, LLC



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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 > wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

Testa & Pagnanelli, LLC



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t 610.239.1000 | f 215.814.8998

maria@tpfamilylaw.com

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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 < <u>maria@tpfamilylaw.com</u>> **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 > wrote: Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

Testa & Pagnanelli, LLC



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

Date: Sunday, September 22, 2024 at 7:00 PM

To: Steve Boerner <<u>stephen.boerner@gmail.com</u>>

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.

Lwill angale with you on Tugaday

Testa & Pagnanelli, LLC



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Radnor, Pennsylvania 19087

Prom: 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 > wrote:

How about Tuesday at 4?

Testa & Pagnanelli, LLC



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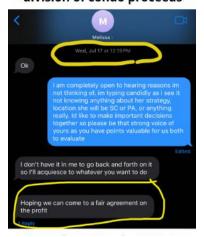
To: Steve Boerner <<u>stephen.boerner@gmail.com</u>>

Subject: Re: Stephen Boerner Divorce Papers

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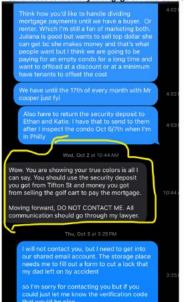
July 17th, 2024

Melissa states desire for fair division of condo proceeds



October 2nd, 2024

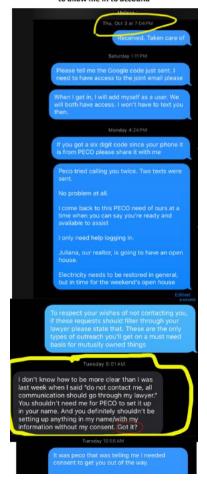
Melissa gives illogical reason to not contribute to monthly mortgage of Phila Condo.



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 accound



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, feal with the mortgage independently of you, per your denial to contribute, on my own, so on, and so on.

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 saked for my access. You've denied me of that. This makes efforts more difficult.

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



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 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 (<u>stephenandmelissaboerner@gmail.com</u>) 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> wrote:

Hi,

It has been submitted; waiting for the timestamp. Then, it will be served.

Testa & Pagnanelli, LLC



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Radnor 150 N. Radnor Chester Road Suite F-200 From: Steve Boerner < stephen.boerner@gmail.com >

Date: Wednesday, October 9, 2024 at 3:12 PM

To: Maria Testa, Esquire < <u>maria@tpfamilylaw.com</u>> **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> wrote:

I totally get it.

Let's do 3pm (my time) tomorrow (Thursday).

Thank you!

Testa & Pagnanelli, LLC



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From: Steve Boerner < stephen.boerner@gmail.com >

Date: Tuesday, October 1, 2024 at 3:23 PM

To: Maria Testa, Esquire < <u>maria@tpfamilylaw.com</u>> **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> wrote:

Hi,

Can we try again for a chat?

When can you chat Thursday or Friday?

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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



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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> wrote:

How about Tuesday at 4?

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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@tptamilylaw.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.

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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.

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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.

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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> 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>

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From: Maria Testa, Esquire

10.9.24 Answer to Plaintiffs
Complaint in Divorce Counter Claim...

