

# A Summary of Recent Appellate Court Decisions From Pennsylvania & Other Jurisdictions

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REPORTING DECISIONS THROUGH MAY 15, 2010

## PENNSYLVANIA APPELLATE COURT DECISIONS

### I. CAUSES OF ACTION

#### A. Defamation

- [\*Kurowski v. Burroughs\*, 2010 PA Super 69 \(April 26, 2010\)](#)

- **Holding:** An editorial containing a statement of opinion is not capable of a defamatory meaning, and therefore not actionable, if it is based on disclosed facts, whereas an opinion that is reasonably understood to imply the existence of undisclosed defamatory facts may be actionable in a defamation claim.

All decisions are “hyperlinked” to the slip opinion. All you have to do is “click” (or “ctrl + click”) on the title of the case, and if connected to the Internet, your browser will open up the decision for you to read in its entirety. Try it and see!

#### B. Sovereign Immunity

- [\*Estate of Stein v. Pennsylvania Turnpike Commission\*, No. 1964 C.D. 2008 \(Pa.Cmwlt., February 16, 2010\)](#)

- **Holding:** A wrongful death claim in which plaintiff asserts that the defective design of a guardrail on the highway was “a dangerous condition of Commonwealth real estate” is barred by sovereign immunity because the design of the guardrail did not render the highway unsafe for the purpose of travel on the highway.

### II. CIVIL PROCEDURE

#### A. Amendment of Pleadings

- [\*Meadows v. Goodman\*, 2010 PA Super 55 \(March 4, 2010\)](#)

- **Holding:** A trial court erred by denying a “motion to amend complaint” seeking to join a defendant, which had been filed by the plaintiff before the statute of limitations had run, and where neither the named defendant nor the proposed defendant would suffer prejudice.

#### B. Venue

- [\*Hunter v. Shire, US\*, 2010 PA Super 39 \(March 17, 2010\)](#)

- **Holding:** A plaintiff’s decision about where to institute an action cannot be disturbed except for weighty reasons and secondly, an alternative forum must exist. In making the determination regarding the existence of weighty reasons, the court should consider the private and public interest factors discussed in *Wright v. Aventis Pasteur, Inc.* 905 A.2d 544 (Pa.Super. 2006).

### III. DISCOVERY

#### A. *Mental Health Records-Privilege*

□ [\*Gormley v. Edgar, 2010 PA Super 71 \(April 26, 2010\)\*](#)

- **Holding:** The psychiatrist/psychologist-patient privilege, 42 Pa.C.S. § 5944, does not bar discovery of a patient's mental health records when a party places his or her mental health at issue. The Court further agreed that the requested discovery was not barred by the Mental Health Procedures Act, 50 P.S. § 7101 *et. seq.*, (MHPA), and its confidentiality provisions contained in § 7111(a), or the Mental Health and Mental Retardation Act of 1966, (MHMRA), 50 P.S. § 4605. Of note, the Court held that the following allegation in the underlying Complaint was sufficient to permit discovery of the plaintiff's mental health records:

[Plaintiff] has been unable to attend to her usual duties and occupations, avocations and enjoyment of life, all to her great loss, frustration and anxiety, and she may continue to be so disabled for an indefinite time in the future.

Conversely, the Court affirmed the trial court's conclusions that the following averments in the Complaint did not open the door to discovery because they related to general averments of shock, mental anguish and humiliation, routinely recoverable damages for noneconomic loss in Pennsylvania:

14. As a direct and proximate result of the accident herein referenced, the plaintiff has suffered a severe shock to her nerves and nervous system, a condition which may be permanent or continue for an indefinite time in the future.

15. As a further result of the said accident, plaintiff has suffered severe physical pain, mental anguish and humiliation and which such suffering may continue for an indefinite period of time in the future.”

*Plaintiff's counsel must now carefully evaluate how they draft their Complaints if they wish to avoid discovery of sensitive information that may not be relevant to the underlying claims.*

#### B. *Discovery - Sanctions*

□ [\*Rohm and Haas Co. v. Lin, 2010 PA Super 26 \(March 1, 2010\)\*](#)

- **Holding:** Although Pa.R.Civ.P. 4019 authorizes a trial court to enter a default judgment against a defendant that fails to comply with the court's discovery orders, the trial court should only use this remedy when the violation of the discovery rules is willful and the opposing party has been prejudiced.

### IV. MOTOR VEHICLE CLAIMS

#### A. *Collateral Estoppel - Damages – Underinsured Insured Motorist & Third Party Claims*

□ [\*Catropa v. Carlton, 2010 PA Super 85 \(May 14, 2010\)\*](#)

- **Holding:** The defendant in a third party action arising from a motor vehicle accident is not estopped from challenging the amount of plaintiff's damages based upon a determination of plaintiff's damages in a separate UIM proceeding, even when the same insurance company provides liability coverage for the tortfeasor and UIM coverage for the plaintiff.

**B. Underinsured Motorist Claims – Offsets**

□ [Tannenbaum v. Nationwide Insurance Co., No. 100 MAP 2007 \(Pa., April 28, 2010\)](#)

- **Holding:** Under Section 1722 of the Motor Vehicle Financial Responsibility Law, 75 Pa.C.S.A., "an insured's recovery under UM/UIM policies may be offset by group/program/arrangement benefits," including disability benefits purchased by the insured, as long as those benefits are not subject to subrogation. Section 1722 reflects the Legislature's intent to shift a share of the liability for injuries caused by uninsured/underinsured motorists from automobile insurance carriers to collateral source providers in order to reduce motor vehicle insurance premiums. Justice Todd filed a [dissenting opinion](#) arguing that the Legislature did not intend to prohibit recovery by individuals who procure, at their own expense, excess insurance in order to augment their level of coverage.

**V. PREMISES LIABILITY CLAIMS**

**A. Summary Judgment – Trivial Defects**

□ [Mull v. C.S. Ickes, Jr., 2010 PA Super 80 \(May 4, 2010\)](#)

- **Holding:** Although property owners have a duty to maintain their sidewalks in a safe condition, they are not responsible for trivial defects that exist in a sidewalk. In this case, the plaintiff fell on a winter afternoon, when there was snow on the sidewalk, although there was no accumulation where plaintiff fell. Rather, plaintiff fell when she stepped into a two-inch uneven gap on the sidewalk and her ankle twisted. Where, as here, the defect was not so obviously trivial as a matter of law, summary judgment is not appropriate.

**VI. TRIAL**

**A. New Trial – Damages**

□ [Estate of Rettger v. UPMC Shadyside, 2010 PA Super 41 \(March 17, 2010\)](#)

- **Holding:** When a jury's verdict does not bear a reasonable resemblance to proven damages, a trial court should award a new trial and may limit the issue at trial to damages.

**B. Expert Witness Qualifications – MCARE**

□ [Vicari v. Spiegel, No. 17 EAP 2009 and No. 18 EAP 2009 \(Pa. March 25, 2010\)](#)

- **Holding:** Pursuant to Section 512 of the MCARE Act, 40 P.S. § 1303.512, a court may waive the requirements that an expert witness be board certified by the same or similar board as the defendant and practice in the same or substantially similar subspecialty as the defendant if the court determines that the expert possesses "sufficient training, experience and knowledge" to testify as to the standard of care "as a result of active involvement in ...medicine in the applicable subspecialty or related field of medicine."

Justice Castille filed a [concurring opinion](#), asserting that the MCARE-based objection was waived at trial because it was not raised in a timely manner. He believed, however, that it was correct for the majority to reach the merits because the Superior Court's disposition of the waiver issue was unclear and appellants did not pursue the waiver argument in their petition for review to the Supreme Court. Justice Saylor also filed a [concurring opinion](#), in which he would have found for the Appellee based upon Appellant's failure to raise the objection in a timely manner, *i.e.*, the objection to the expert's qualifications was untimely because it was made after the time Appellee could have cured any alleged defect.

## VII. WORKERS' COMPENSATION

### A. *Calculation of Benefits – Multiple Injuries*

- [\*Christy v. Workers' Compensation Appeal Board \(Philadelphia Gear Corp.\)\*, No. 1276 C.D. 2009 \(Pa.Cmwth., March 12, 2010\)](#)
  - **Holding:** When a Claimant suffers from two work related injuries that are separately totally disabling, compensation should be based on the later in time injury until the entitlement to benefits for that injury changes. This rule also applies to offsets, *i.e.*, the injury that determines the benefit rate also determines the offset rates.

### B. *Calculation of Benefits – Offsets*

- [\*Commonwealth v. Workers' Compensation Appeal Board \(Harvey\)\*, No. 14 EAP 2009 \(Pa., April 29, 2010\)](#)
  - **Holding:** The use of actuarial data to calculate pension offsets for injured employees who also receive pension benefits from a defined benefit plan is permissible. Affirming the Commonwealth Court, Justice Saylor held that “actuarial assumptions and calculations *may form the basis* for a reasoned determination of the employer-funded component of a defined-benefit plan.” (emphasis supplied). In essence, the Court affirmed the procedure that has been used by the Commonwealth and others for many years to calculate these offsets, but the Court also affirmed the “practical necessity of expert opinion testimony in matters [such as this].”
- [\*Kelly v. Workers' Compensation Appeal Board \(US Airways Group, Inc.\)\*, No. 50 WAP 2008 \(Pa., April 9, 2010\)](#)
  - **Holding:** An employer is not entitled to a severance benefit offset for a furlough allowance under Section 204(a) of the Workers' Compensation Act because a severance benefit is contingent on the dismissal of an employee, whereas a furloughed employee may be recalled to work and therefore has not been dismissed from employment.

### C. *Counsel Fees*

- [\*City of Philadelphia v. Workers' Compensation Appeal Board \(Ford-Tilghman\)\*, No. 1049 C.D. 2009 \(Pa.Cmwth., March 17, 2010\)](#)
  - **Holding:** Because a 20 percent fee is *per se* reasonable, a Workers' Compensation Judge must approve a 20 percent counsel fee, even for a claimant receiving benefits pursuant to the Heart and Lung Act. The fee must be paid because Workers' Compensation Judges do not have jurisdiction in Heart and Lung Act matters, and Claimants are entitled to pursue both claims for workers' compensation and Heart and Lung Act benefits.

### D. *Defenses – Intoxication*

- [\*Thomas Lindstrom Co., Inc. v. Workers' Compensation Appeal Board \(Braun\)\*, No. 1815 C.D. 2009 \(Pa.Cmwth., April 13, 2010\)](#)
  - **Holding:** In order for intoxication to be an affirmative defense to a Claim Petition, an employer must establish that the employee's intoxication was “the cause in fact” of the injury. Because the doctor or medical expert is not required to use these “magic words” when delivering a causation opinion, it is up to the fact finder to determine whether the claimant's intoxication caused his injury.

**E. Eligibility – Fixed Place of Employment**

□ [Mackey v. Workers' Compensation Appeal Board \(Maxim Health Care Services\), No. 1903 C.D. 2009 \(Pa.Cmwlt., February 17, 2010\)](#)

- **Holding:** Although employees without a fixed place of employment are generally eligible for benefits for injuries sustained traveling to and from a job, the Court here concluded that claimant was not eligible for workers' compensation benefits because – despite not having a fixed place of work – she had been assigned to work at the same location for 1-1/2 years. In this case, a nurse without a fixed place of employment was injured while traveling to the home of a patient to whom she had been assigned for quite a while. The Court held that, under these circumstances, she was not entitled to workers' compensation benefits and distinguished this case from the Supreme Court's opinion in *Peterson*, 528 Pa. 279 (1991).

**F. Modification of Benefits – Labor Market Surveys**

□ [Marx v. Workers' Compensation Appeal Board \(United Parcel Service\), No. 1176 C.D. 2009 \(Pa.Cmwlt., February 9, 2010\)](#)

- **Holding:** When modifying a claimant's wages based upon a labor market survey, a WCJ is not obligated to average the wages of the jobs in the survey. Rather, the WCJ may modify the claimant's benefits based upon the highest paying position among those found to be within the claimant's physical and vocational capabilities.

□ [Kleinhagan v. Workers' Compensation Appeal Board \(KNIF Flexpak Corp.\), No. 2009 C.D. 2009 \(Pa.Cmwlt., April 22, 2010\)](#)

- **Holding:** When an employer seeks to modify a claimant's benefits based upon a labor market survey, the claimant bears the initial burden of raising the issue of a vocational expert's failure to supply claimant with a copy of the survey as a defense to the petition.

**G. Modification of Benefits – NARW**

□ [Kleinhagan v. Workers' Compensation Appeal Board \(KNIF Flexpak Corp.\), No. 2009 C.D. 2009 \(Pa.Cmwlt., April 22, 2010\)](#)

- **Holding:** The crucial factor in determining what constitutes "prompt" service of a Notice of Ability to Return to Work for the purposes of Section 306(b)(3) of the Act is the impact on the claimant. If the claimant receives the Notice before employer attempts to modify benefits and within a reasonable time after the employer's receipt of medical evidence that claimant is capable of work, then claimant is not adversely impacted and there are no issues with service.

**H. Payments – Calculations of Date**

□ [Barrett v. Workers' Compensation Appeal Board \(Vision Quest National\), No. 984 C.D. 2009 \(Pa.Cmwlt., November 5, 2009\)](#)

- **Holding:** A payment under the Workers' Compensation Act occurs when the funds are made available by virtue of a deposit or cashing of a check, and not when the check is issued or received.

I. *Pension Offsets*

- [\*City of Philadelphia v. Workers' Compensation Appeal Board \(Harvey\)\*, No. 1379 C.D. 2009 \(Pa.Cmwlt., March 17, 2010\)](#)

- **Holding:** An employer is only entitled to offset a Claimant's workers' compensation benefits by the amount of pension benefits actually *received* by Claimant and not by the entire amount of pension benefits funded by the employer.

J. *Reinstatement of Benefits*

- [\*Polis v. Workers' Compensation Appeal Board, \(Verizon Pennsylvania, Inc.\)\*, No. 1549 C.D. 2009 \(Pa.Cmwlt., January 8, 2010\)](#)

- **Holding:** When a claimant's modified duty job is eliminated and no other work is made available with his medical restrictions, the worker is entitled to a reinstatement of benefits. An employer is entitled to a credit for any severance benefits paid to the worker.

K. *Suspension of Benefits – Non-Work-Related Injuries*

- [\*Wells v. Workers' Compensation Appeal Board \(Skinner\)\*, No. 1136 C.D. 2009 \(Pa.Cmwlt., March 12, 2010\)](#)

- **Holding:** Pursuant to *Kachinski*, an employer must still establish job availability prior to seeking a modification or suspension of benefits, even where Claimant has other non-work related injuries that may preclude him from working. However, when an employer fails to provide the claimant with a Notice of Ability to Return to Work, the employer is not entitled to a suspension or modification of benefits based upon the claim that the injured worker is capable of performing some work.

L. *Temporary Compensation*

- [\*Thomas Lindstrom Co., Inc. v. Workers' Compensation Appeal Board \(Braun\)\*, No. 1815 C.D. 2009 \(Pa.Cmwlt., April 13, 2010\)](#)

**Holding:** Under Section 406.1 of the Workers' Compensation Act, a Notice Stopping Temporary Compensation Payable must be sent or filed within five days of the end of the last day of the insurer's payment *cycle*, thus preventing employers from being penalized for paying benefits early in a payment period.

M. *Termination of Benefits – Body Parts Examined*

- [\*Stancell v. Workers' Compensation Appeal Board \(LKI Group, LLC\)\*, No. 1901 C.D. 2009 \(Pa.Cmwlt., March 10, 2010\)](#)

- **Holding:** A Workers' Compensation Judge errs by granting a termination of benefits when the defendant's medical expert, upon whom the Judge's Decision is based, fails to examine one of the body parts acknowledged in the Notice of Compensation Payable.

N. *Termination of Benefits – Evidence*

- [\*Mino v. Workers' Compensation Appeal Board \(Crime Prevention Assoc.\)\*, No. 41 C.D. 2009 \(Pa.Cmwlt., February 26, 2010\)](#)

- **Holding:** A Workers' Compensation Judge's Decision terminating benefits must be based upon a conclusion that the claimant had recovered from the acknowledged work injuries and any injuries additionally recognized by any other WCJ.

**O. Utilization Review Requests – Compliance**

- [\*Shaw v. Workers' Compensation Appeal Board \(Melrath Gasket Co.\)\*, No. 1871 C.D. 2009 \(Pa.Cmwlt., April 21, 2010\)](#)

- **Holding:** Addressing an issue of first impression, the Court held that although there is no rule prohibiting a medical provider from sending medical records to a URO on a CD-ROM, if the provider protects the contents with a password, that password must be provided to the URO by the URO's deadline in order to sufficiently comply with Utilization Review Request.

**P. Utilization Review Requests – Multiple Providers**

- [\*MV Transportation v. Workers' Compensation Appeal Board \(Harrington\)\*, No. 974 C.D. 2009 \(Pa.Cmwlt., February 25, 2010\)](#)

- **Holding:** An employer must file a separate Utilization Review petition for each provider; consequently, a review of one provider's treatment cannot be expanded to include review of another provider's treatment. This applies even, as in this case, when a claimant receives physical therapy from multiple therapists in the same office.

**Q. Utilization Review Requests – Obligation to Pay on Appeal**

- [\*Scranton School District v. Workers' Compensation Appeal Board \(Carden\)\*, No. 1567 C.D. 2009 \(Pa.Cmwlt. March 12, 2010\)](#)

- **Holding:** Section 306(f.1)(5) of the Pennsylvania Workers' Compensation Act (Act) does not suspend the obligation to pay medical bills which have been subjected to a Request for UR Review when there is a UR determination that the treatment is reasonable and necessary. Thus, the WCJ properly assessed penalties against the employer.

**VIII. PENNSYLVANIA SUPREME COURT**

**A. The Pennsylvania Supreme Court has granted allocatur in the following cases on the stated issues:**

- [\*Daley v. A.W. Chesterton, Inc.\*, No. 415 EAL 2009 \(May 11, 2010\)](#)

- Did the Superior Court err by permitting suits for more than one malignant disease resulting from the same asbestos exposure under the "two-disease" rule?

- [\*Gillard v. AIG Insurance Co.\*, No. 72 EAL 2008 \(March 16, 2010\)](#)

- 1: Whether the attorney-client privilege applies to communications from the attorney to the client.

- 2: Whether the Superior Court erred in holding the attorney-client privilege applies only to confidential communications from the client to the attorney, pursuant to *Nationwide Mutual Insurance Co. v. Fleming*, 924 A.2d 1259 (Pa. Super. 2007).

- [\*Manella v. Port Authority of Allegheny County\*, No. 529 WAL 2009 \(March 16, 2010\)](#)

- Whether 42 Pa.C.S. § 8522(b)(1), relating to the statutory exception to sovereign immunity associated with the operation of a motor vehicle, applies to the negligent lowering of a motorized mechanical wheelchair ramp that is an integral part of a bus.

**B. Rules of Disciplinary Enforcement**

□ [Amendment of Rule 219 of the Pennsylvania Rules of Disciplinary Enforcement](#)

- Beginning on July 1, 2010, Pennsylvania attorneys must certify to the Attorney Registration Office whether they are covered by professional liability insurance on the date of registration in the minimum amounts required by Rule of Professional Conduct 1.4(c). The Disciplinary Board will make this information available to the public upon written or oral request and on its website.

**IX. U.S. SUPREME COURT**

**A. Arbitration – Class Actions**

□ [Stolt-Nielsen S. A. v. Animal Feeds International Corp., No. 08-1198 \(April 27, 2010\)](#)

- **Holding:** A party may not be compelled under the Federal Arbitration Act to submit to class arbitration unless there is a contractual basis for concluding that the party agreed to do so. If the contract is silent on class arbitration, it is not permitted. Justice Ginsburg, joined by Justice Stevens and Justice Breyer, dissented on the basis that the Court erred by addressing an issue not yet ripe for review.

**X. U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK**

**A. Electronic Discovery – Preservation of Evidence**

□ [The Pension Committee of the University of Montreal Pension Plan v. Banc of America Securities, LLC, 05 Civ. 9016 \(SAS\) \(January 15, 2010\)](#)

- **Holding:** The duty to preserve evidence, including electronic evidence, arises as soon as a party reasonably anticipates litigation. Sanctions are required where litigants are negligent, grossly negligent or willful with respect to meeting discovery obligations and avoiding the spoliation of evidence.

**XI. U.S. COURT OF APPEALS FOR THE THIRD CIRCUIT**

**A. Social Security Claims – Counsel Fees**

□ [Walker v. Astrue, and Garris v. Astrue, Nos. 08-1446 and 08-1447 \(February 2, 2010\)](#)

- **Holding:** The Third Circuit joins the Fifth and Eleventh Circuits in holding that Rule 54(d)(2) of the Federal Rules of Civil Procedure governs filing deadlines in Social Security cases for counsel seeking attorney fees following a § 406(b) administrative remand. Application of the fourteen-day deadline is tolled until the notice of award is issued by the Commissioner and counsel is notified of the award.

**XII. NEW JERSEY SUPREME COURT**

**A. In Personam Jurisdiction – Foreign Companies**

□ [Nicastro v. McIntyre Machinery America, Ltd., 987 A.2d 575 \(N.J., February 2, 2010\)](#)

- **Holding:** The New Jersey Supreme Court extends the scope of personal jurisdiction in products liability cases, holding that a foreign manufacturer who places a defective product in the stream of commerce through a distribution scheme that targets a national market, which includes New Jersey, may be subject to the in personam jurisdiction of a New Jersey court, even where the manufacturer has no minimum contacts in the state.

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