

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defense or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

York County Bar Association
Lawyer Referral Service
137 E. Market Street
York, PA 17401
(717) 854-8755

Usted ha sido demandado en la corte. Si desea defenderse de los reclamos establecidos en las siguientes páginas, debe tomar medidas dentro de los veinte (20) días posteriores a la presentación de esta queja y notificación, presentando una comparecencia por escrito personalmente o por un abogado y presentando por escrito ante el tribunal su defensa u objeciones a los reclamos establecidos en su contra. Se le advierte que si no lo hace, el caso puede continuar sin previo aviso por cualquier dinero reclamado en la Demanda o por cualquier otra reclamación o reparación solicitada por el Demandante. Puede perder dinero o propiedad u otros derechos importantes para usted.

DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO DE INMEDIATO. SI NO TIENE UN ABOGADO O NO PUEDE PAGAR UNO, VAYA O TELÉFONO A LA OFICINA ESTABLECIDA A CONTINUACIÓN PARA ENCONTRAR DONDE PUEDE OBTENER AYUDA LEGAL:

Colegio de Abogados del Condado de York
Servicio de referencia de abogados
137 E. Market Street
York, PA 17401
(717) 854-8755

AVISO

**IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW**

PEARL WISE, individually and as :
Personal Representative of the Estate :
of CHAD MICHAEL MERRILL :
68 Kennick Drive, Windsor, PA 17366 :
Plaintiff :

Case No. 2020-SU-001480

vs. :

FRANK SPAGNOLO d/b/a RED ROSE :
RESTAURANT & LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

Type of Pleading: COMPLAINT

NICK SPAGNOLO a/k/a NICHOLAS :
SPAGNOLO d/b/a RED ROSE :
RESTAURANT & LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

**Behalf of: Plaintiff, PEARL WISE,
individually and as personal representative
of ESTATE of CHAD MICHAEL MERRILL**

GIUSEPPE SPAGNOLO d/b/a RED ROSE :
RESTAURANT & LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

SPAGNOLO BROS, LLC a/k/a :
SPAGNOLO BROTHERS, LLC d/b/a RED :
ROSE RESTAURANT & LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

**Counsel of Record for this Party:
Howard G. Silverman, PA ID 48319
Samuel G. Encarnacion, PA ID 64417
HAGGERTY & SILVERMAN, P.C.**

NICK & JOE, LLC d/b/a RED ROSE :
RESTAURANT & LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

**240 North Duke Street
Lancaster, PA 17602
Telephone: (717) 397-3200
Facsimile: (717) 397-3724**

ANITA'S, INC. a/k/a ANITA INC. a/k/a :
ANITA'S CORP d/b/a RED ROSE :
RESTAURANT & LOUNGE and RED :
ROSE BAR AND LOUNGE :
5370 Lincoln Highway, York, PA 17406 :
and :

Email: SamE@haggertylaw.com

ADDITIONAL DEFENDANTS ON PAGE TWO

DAVID VOUGHT d/b/a GLAD CRAB :
3086 S. Queen Street, Dallastown, PA 17313:
and :
GLAD CRAB I, INC., d/b/a GLAD CRAB :
3086 S. Queen Street, Dallastown, PA 17313:
Defendants :

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, Pearl Wise, individually and as Personal Representative of the Estate of Chad Michael Merrill, through her attorneys, Haggerty & Silverman, P.C., states that she has a cause of action against Defendants, Frank Spagnolo d/b/a Red Rose Restaurant & Lounge; Nick Spagnolo a/k/a Nicholas Spagnolo d/b/a Red Rose Restaurant & Lounge; Giuseppe Spagnolo d/b/a Red Rose Restaurant & Lounge; Spagnolo Bros, LLC, a/k/a Spagnolo Brothers, LLC d/b/a Red Rose Restaurant & Lounge; Nick & Joe, LLC d/b/a Red Rose Restaurant & Lounge; Anita's, Inc. a/k/a Anita Inc. a/k/a Anita's Corp d/b/a Red Rose Restaurant & Lounge and Red Rose Bar and Lounge; David Vought d/b/a Glad Crab; and Glad Crab I, Inc. d/b/a Glad Crab and in support thereof avers the following:

I. PARTIES

1. Plaintiff, Pearl Wise, is an adult individual at all times herein residing at 68 Kennick Drive, Windsor, York County, Pennsylvania 17366.
2. Plaintiff Pearl Wise is the Personal Representative of the Estate of Chad Michael Merrill, deceased, with Letters of Administration being granted to her by the York County Register of Wills Office on April 13, 2020.
3. Plaintiff's Decedent is Chad Michael Merrill, who, at the time of his death, was a 25 year old resident of Pennsylvania, having been born on March 30, 1993, and died on July 21, 2018.
4. Defendant Frank Spagnolo is an adult individual who, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant &

Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

5. Defendant Nick Spagnolo a/k/a Nicholas Spagnolo is an adult individual who, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant & Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

6. Defendant Giuseppe Spagnolo is an adult individual who, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant & Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

7. Defendant Spagnolo Bros., LLC, a/k/a Spagnolo Brothers, LLC, is a Pennsylvania business entity that, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant & Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

8. Defendant Nick & Joe, LLC, is a Pennsylvania business entity that, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant & Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

9. Defendant Anita's Inc. a/k/a Anita, Inc. a/k/a Anita's Corp., is a Pennsylvania business entity that, based on information and belief, has an ownership interest in the business and/or premises of Red Rose Restaurant & Lounge located at 5370 Lincoln Highway, York, Pennsylvania 17406.

10. Defendant David Vought is an adult individual who, upon information and belief, is owner of Glad Crab located at 3086 S. Queen Street, Dallastown, Pennsylvania 17313.

11. Defendant Glad Crab I, Inc. is a Pennsylvania business entity that upon information and belief, has an ownership interest in the business and/or premises of Glad Crab located at 3086 S. Queen Street, Dallastown, Pennsylvania 17313.

JURISDICTION AND VENUE

12. Jurisdiction and Venue is proper in the Court of Common Pleas of York County in that all Defendants reside or do business in York County and all events relevant to this matter occurred in York County, Pennsylvania.

OPERATIVE FACTS

13. Upon information and belief, on or about July 21, 2018, James Saylor, right after the end of his work shift, started drinking alcoholic beverages at approximately 12:00 pm, and continued drinking a significant amount of alcohol throughout the afternoon and early evening.

14. It is believed that during this time, Saylor had consumed approximately twelve (12) beers and 40 ounces of Long Island Iced Tea slushies, plus numerous shots of distilled spirits.

15. At all times relevant hereto, Defendant David Vought owned and operated a business facility known as "Glad Crab," a bar and restaurant open to the general public and located at 3086 S. Queen Street, Dallastown, Pennsylvania 17313.

16. Upon information and belief, on or about July 21, 2018, Saylor arrived at the Glad Crab at approximately 11:17 pm and was served alcoholic shots and beer as a patron by one or more employees of Glad Crab.

17. When Saylor arrived at the Glad Crab, Defendant David Vought noticed James Saylor and observed that Saylor appeared to be acting “very hyper and very strung out.”

18. Despite the visibly intoxicated state of Saylor, Defendants David Vought d/b/a Glad Crab and Glad Crab I, Inc. d/b/a Glad Crab (herein referred to as the “Glad Crab Defendants”) acting through its employees, served him additional alcoholic beverages.

19. When Saylor was leaving the Glad Crab he was observed acting aggressively and intoxicated by Defendant David Vought. As a result, Defendant David Vought along with the bartender had to physically remove Saylor from the bar.

20. At all times relevant hereto, the Glad Crab Defendants acted through their authorized agents, servants, employees, or other representatives. The complete, correct identity of those individuals is in the exclusive control of Defendants and is not presently known to Plaintiff.

21. The Glad Crab Defendants, through their authorized agents, servants, employees, or other representatives, knew or had reason to know that Saylor was a visibly intoxicated person.

22. The Glad Crab Defendants, through their authorized agents, servants, employees, or other representatives, knew or had reason to know that Saylor constituted a risk of harm to others by virtue of being in an intoxicated state.

23. Despite the state of visible intoxication exhibited by Saylor, the Glad Crab Defendants served Saylor additional alcoholic beverages and then allowed him to exit the bar and drive drunk onto the public street without alerting the authorities.

24. At all times relevant hereto, Defendants Frank Spagnolo, Nicholas Spagnolo, Giuseppe Spagnolo, Spagnolo Bros LLC, Nick & Joe, LLC and Anita, Inc. (herein referred to as “Red Rose Defendants”) owned and operated a business facility known as “Red Rose Restaurant & Lounge,” a bar and restaurant open to the general public and located at 5370 Lincoln Highway, York, Pennsylvania 17406.

25. At all times relevant hereto, the Red Rose Defendants acted through their authorized agents, servants, employees, and other representatives. The complete, correct identity of those individuals is in the exclusive control of the Red Rose Defendants and is not presently known to Plaintiff.

26. At all times material hereto, the Red Rose Defendants owned and controlled the subject premises Red Rose Restaurant & Lounge (“Red Rose”) and were responsible for keeping it free from any dangerous and hazardous condition.

27. At all times relevant hereto, as a customer, Plaintiff’s Decedent Chad Merrill was a business invitee of the premises.

28. As such, Plaintiff’s Decedent Chad Merrill was entitled to the highest degree of care to be exercised on the part of Defendants and their agents, servants, and employees.

29. On or about July 21, 2018, James Saylor was a customer at the Red Rose.

30. When James Saylor arrived at Red Rose he had already consumed a significant amount of alcohol and was a visibly intoxicated person.

31. Patrons who observed James Saylor at Red Rose concluded he was intoxicated and James Saylor was demonstrating signs of intoxication including vomiting inside the

premises.

32. Despite the visibly intoxicated state of James Saylor, the Red Rose Defendants' employees served him additional alcoholic beverages. These drinks included several shots of Fireball and Pabst Blue Ribbon beers.

33. At approximately 12:30 a.m., James Saylor made vicious and ugly racist remarks directed at an African-American patron by the name of Jerrell Grandison-Douglas.

34. Once this altercation developed, Defendant Nick Spagnolo a/k/a Nicholas Spagnolo was alerted via text message of this situation by the bartender.

35. Efforts to deescalate the situation failed and Defendant Nick Spagnolo a/k/a Nicholas Spagnolo decided to escort James Saylor out of the bar.

36. Patron Jerrell Grandison-Douglas, who was the person verbally abused by Saylor, warned the bartender at the Red Rose that someone needed to go out to the parking lot and make sure James Saylor left the premises.

37. As Saylor was being escorted out of the bar area, he engaged in another verbal altercation with another patron who was coming into the bar through the vestibule area.

38. Despite the warning from Mr. Grandison-Douglas, Defendant Nicholas Spagnolo failed to escort James Saylor out of the parking lot area and returned to the bar after reaching the vestibule area.

39. James Saylor exited the Red Rose on his own and struggled to find his truck in the parking lot.

40. The Red Rose had no security staff or personnel outside the parking lot area.

41. The Red Rose had a network of video cameras which allowed them in real time to monitor the inside of the bar and the parking lot area. Specifically, the Red Rose had two (2) separate DVR systems that had multiple cameras connected to various videos in different areas. The Red Rose had approximately fourteen (14) cameras in operation that evening.

42. While James Saylor was walking around the parking lot area, he took out a .45 caliber handgun that was tucked into his pants, and discharged the firearm in the direction of the Red Rose, hitting its windows.

43. While James Saylor remained in the parking lot for approximately three (3) minutes, Plaintiff's Decedent left the bar and walked outside to the parking lot area.

44. James Saylor drove his truck up to Plaintiff's Decedent Chad Merrill and shot him in the chest, causing his death.

45. At all times material hereto, the Red Rose Defendant's employees knew or had reason to know that James Saylor was visibly intoxicated and clearly agitated and dangerous, posing a serious risk of harm to Plaintiff's Decedent and other customers and persons on the premises and the general public.

46. By serving additional alcoholic beverages to James Saylor and then failing to ensure that James Saylor was completely removed from their premises, the Red Rose Defendants created a dangerous and hazardous condition for Plaintiff and the general public.

47. As a direct and proximate result of the negligence and recklessness of All Defendants, their owners, agents, servants, and/or employees, Plaintiff's Decedent Chad Merrill lost his life, leaving his young son without a father.

48. Plaintiff's Decedent Chad Merrill suffered personal injury and conscious pain and suffering from the time that James Saylor shot him until the time of his death.

49. The beneficiaries of Plaintiff's estate have suffered the damages recoverable under the Survival and Wrongful Death Acts to which they are entitled under the laws of the Commonwealth of Pennsylvania.

50. The injuries described herein were caused solely and exclusively by the negligence and recklessness of All Defendants, their owners, agents, servants, and/or employees and were in no manner whatsoever caused or contributed to by any act or omission on the part of Plaintiff.

COUNT ONE – SURVIVAL ACTION (NEGLIGENCE)
PLAINTIFF PEARL WISE, individually and as Personal Representative
of the ESTATE of CHAD MICHAEL MERRILL vs.
THE GLAD CRAB DEFENDANTS

51. All previous paragraphs are incorporated herein.

52. Decedent Chad Michael Merrill did not bring an action for his personal injuries during his lifetime and no other action for the death of the Decedent has been commenced against the Glad Crab Defendants.

53. Plaintiff brings this action pursuant to the Probate Estates and Fiduciary Code, 20 Pa.C.S.A. § 3372, 3373 and 42 Pa.C.S.A. § 8302, commonly known as the Survival Act, and claims all damages recoverable under that Statute by the Estate of Chad Michael Merrill, on behalf of himself and all other entitled to recover under law, including, but not limited to, damages for Chad Merrill's loss of earnings and earning capacity, medical expenses, damages

for the pain, fear, anxiety, suffering and mental and emotional distress which Chad Merrill suffered prior to his death, and damages for Chad Merrill's loss of his ability to engage in normal activities and enjoy the normal pleasures of life.

54. The negligence and recklessness of the Glad Crab Defendants and its agents, servants, and/or employees consisted of the following:

(a) Pennsylvania's Dram Shop Act, 47 P.S. § 4-493(1), imposes a duty on licensees and its employees, servants, and agents to refrain from selling liquor or malt or brewed beverages to a visibly intoxicated individual;

(b) The Glad Crab Defendants violated the Dram Shop Act by serving alcohol to James Saylor while he was visibly intoxicated;

(c) As a direct result of the above described violation of 47 P.S. § 4-493(1) *et seq.*, Plaintiff has sustained the injuries and damages as set forth above;

(d) The above-described acts and/or failure to act by the Glad Crab Defendants and its agents, servants, and/or employees constitutes a violation of Pennsylvania's Dram Shop Act and is negligence *per se*;

(e) failing to or negligently supervising its agents, servants, bartenders, servers, and/or employees which resulted in the serving alcohol to a visibly intoxicated individual;

(f) failing to properly train its agents, servants, bartenders, servers, and/or employees which resulted in the serving of alcohol to a visibly intoxicated individual;

(g) failing to provide for the safety of patrons at its premises, including

Plaintiff;

- (h) failing to hire only competent agents, servants, and/or employees;
- (i) failing to alert the police or 911 that an intoxicated person was driving a car onto the public roadway;
- (j) Defendants failed to have a drink cut off limit;
- (k) Defendants failed to protect the Plaintiff's Decedent and general public from the reasonably foreseeable danger of injuries arising from an action caused by intoxicated patrons; and
- (l) falling to employ safety techniques to allow Mr. James Saylor to sober up before he left the premises.

55. As a direct and proximate result of the Glad Crab Defendants' negligent and reckless conduct, Plaintiff has sustained the injuries and damages set forth above.

56. The Glad Crab Defendants acted negligently and with a reckless disregard for the rights, safety and well-being of Plaintiff and the general public, and with a conscious disregard for a known risk of serious bodily harm, thus warranting an award of punitive damages.

WHEREFORE, Plaintiff Pearl Wise, individually and as Personal Representative of the Estate of Chad Michael Merrill, respectfully demands judgment against the Glad Crab Defendants for sums in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of costs, pre-judgment interest, punitive damages and post-judgment interest.

COUNT TWO– SURVIVAL ACTION (NEGLIGENCE)
PLAINTIFF PEARL WISE, individually and as Personal Representative
of the ESTATE of CHAD MICHAEL MERRILL vs.
THE RED ROSE DEFENDANTS

57. All previous paragraphs are incorporated herein.

58. Decedent Chad Michael Merrill did not bring an action for his personal injuries during his lifetime and no other action for the death of the Decedent has been commenced against the Red Rose Defendants.

59. Plaintiff brings this action pursuant to the Probate Estates and Fiduciary Code, 20 Pa.C.S.A. § 3372, 3373 and 42 Pa.C.S.A. § 8302, commonly known as the Survival Act, and claims all damages recoverable under that Statute by the Estate of Chad Michael Merrill, on behalf of himself and all other entitled to recover under law, including, but not limited to, damages for Chad Merrill's loss of earnings and earning capacity, medical expenses, damages for the pain, fear, anxiety, suffering and mental and emotional distress which Chad Merrill suffered prior to his death, and damages for Chad Merrill's loss of his ability to engage in normal activities and enjoy the normal pleasures of life.

60. The negligence and recklessness of the Red Rose Defendants and their owners, agents, servants, and/or employees consisted of the following:

(a) Pennsylvania's Dram Shop Act, 47 P.S. § 4-493(1), imposes a duty on licensees and its employees, servants, and agents to refrain from selling liquor or malt or brewed beverages to a visibly intoxicated individual;

(b) The Red Rose Defendants violated the Dram Shop Act by serving alcohol

to James Saylor while he was visibly intoxicated;

(c) As a direct result of the above described violation of 47 P.S. § 4-493(1) *et seq.*, Plaintiff has sustained the injuries and damages set forth above;

(d) The above-described acts and/or failure to act by the Red Rose Defendants and its agents, servants, and/or employees constitutes a violation of Pennsylvania's Dram Shop Act and is negligence *per se*;

(e) failing to or negligently supervising its agents, bartenders, servants, and/or employees which resulted in the serving alcohol to a visibly intoxicated individual;

(f) failing to properly train its agents, bartenders, servants, and/or employees which resulted in the serving of alcohol to a visibly intoxicated individual;

(g) failing to properly train its agents, bartenders, servants, and/or employees in the proper handling of aggressive patrons;

(h) failing to properly monitor the premises;

(i) failing to properly supervise the premises;

(j) failing to take appropriate safety measures to ensure the safety of persons in the parking lot of the premises;

(k) failing to provide for the safety of patrons at its premises, including Plaintiffs;

(l) failing to hire only competent agents, servants, and/or employees;

(m) failing to provide sufficient staff to ensure the safety of its patrons;

(n) allowing visibly intoxicated and dangerous patrons to remain on its

premises;

(o) failing to remove visibly intoxicated and dangerous patrons from its premises and promptly alert the police of a dangerous situation;

(p) failing to provide management and control of its premises;

(q) failing to prevent a visibly intoxicated person from operating a motor vehicle on Defendant's premises;

(r) failing to warn patrons in the parking lot, including Plaintiff's decedent, of the danger presented by James Saylor's operation of a motor vehicle on the premises;

(s) failing to provide a safe environment for its patrons, including Plaintiff's decedent by failing to securing the bar and not allowing anyone to exit the bar while an ongoing dangerous situation was in progress; and

(t) failing to adequately use the surveillance camera system to protect its patrons and to ensure the shooter was off the premises.

61. As a direct and proximate result of the Red Rose Defendants' negligent and reckless conduct, Plaintiff has sustained the injuries and damages set forth above.

62. The Red Rose Defendants acted outrageously and with a reckless disregard for the rights, safety and well-being of Plaintiff's decedent and the general public, and with a conscious disregard for a known risk of serious bodily harm, thus warranting an award of punitive damages.

WHEREFORE, Plaintiff Pearl Wise, individually and as Personal Representative of the Estate of Chad Michael Merrill, respectfully demands judgment against the Red Rose

Defendants for sums in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of costs, pre-judgment interest, punitive damages and post-judgment interest.

COUNT THREE – WRONGFUL DEATH
PLAINTIFF PEARL WISE, individually and as Personal Representative
of the ESTATE of CHAD MICHAEL MERRILL vs.
ALL DEFENDANTS

63. All previous paragraphs are incorporated herein.

64. Plaintiff is the mother of the Decedent and brings this action pursuant to the Wrongful Death Act, 42 Pa.C.S.A and claims all damages recoverable under that Statute, on behalf of themselves and all other persons entitled to recover under law.

65. Decedent Chad Michael Merrill left surviving him the follow persons entitled to recover damages for his death, on whose behalf this action is brought:

Pearl Wise, Mother
 68 Kennick Drive
 Windsor, PA 17366

Richard Merrill, Father
 2860 8th Street Drive
 Watsontown, PA 17777-8702

Layton Michael Merrill, Child of Decedent
 68 Kennick Drive
 Windsor, PA 17366

66. By reason of the death of Decedent Chad Merrill, his said survivors have incurred funeral, burial, medical, and other expenses and other pecuniary losses recoverable under the Wrongful Death Act.


67. Decedent Chad Michael Merrill's death was the direct and proximate result of the

conduct of the Defendants, as more fully set forth above.

WHEREFORE, Plaintiff Pearl Wise, individually and as Personal Representative of the Estate of Chad Michael Merrill, respectfully demands judgment against All Defendants, jointly and severally, for sums in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of costs, pre-judgment interest, punitive damages and post-judgment interest.

Respectfully submitted,
HAGGERTY & SILVERMAN, P.C.

DATE: 10/23/2020

By: 

Samuel G. Encarnacion, Esquire
Attorney ID. 64417
Attorney for Plaintiff

VERIFICATION

I verify that the averments made in the foregoing document are true upon my personal knowledge or information and belief. I understand that false statements herein are made subject to the statutory penalties relating to unsworn falsification to authorities.

Date: 8/22/20

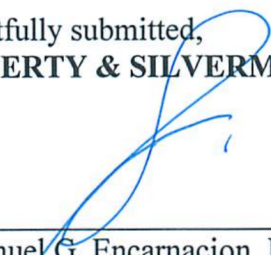
Pearl Wise
PEARL WISE, individually and
as administrator of Estate of
CHAD MICHAEL MERRILL

CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,
HAGGERTY & SILVERMAN, P.C.

DATE: 10/23/2020

By: 

Samuel G. Encarnacion, Esquire
Attorney Identification No.: 64417
Howard G. Silverman, Esquire
Attorney Identification No.: 48319
240 North Duke Street
Lancaster, PA 17602
(717) 397-3200
SamE@haggertylaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true and correct copy of the foregoing document upon the person(s) and in the manner indicated below, which service satisfies the requirements of Pa. R.C.P. 440.

SERVICE ADDRESSED AS FOLLOWS:

Gregory W. Bair, II, Esquire
Stock and Leader
Susquehanna Commerce Center
221 West Philadelphia Street, Suite E600
York, PA 17401-2994
Attorney for Glad Crab Defendants
Via email to gwb@stockandleader.com and First Class Mail

FRANK SPAGNOLO
d/b/a RED ROSE RESTAURANT & LOUNGE
5370 Lincoln Highway, York, PA 17406

and

NICK SPAGNOLO
a/k/a NICHOLAS SPAGNOLO
d/b/a RED ROSE RESTAURANT & LOUNGE
5370 Lincoln Highway, York, PA 17406

and

GIUSEPPE SPAGNOLO
d/b/a RED ROSE RESTAURANT & LOUNGE
5370 Lincoln Highway, York, PA 17406

and

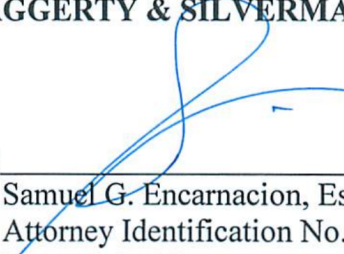
SPAGNOLO BROS, LLC
a/k/a SPAGNOLO BROTHERS, LLC
d/b/a RED ROSE RESTAURANT & LOUNGE
5370 Lincoln Highway, York, PA 17406

and
NICK & JOE, LLC
d/b/a RED ROSE RESTAURANT & LOUNGE
5370 Lincoln Highway, York, PA 17406

and
ANITA'S, INC. a/k/a ANITA INC. a/k/a ANITA'S CORP
d/b/a RED ROSE RESTAURANT & LOUNGE
and RED ROSE BAR AND LOUNGE
5370 Lincoln Highway, York, PA 17406

Respectfully submitted,
HAGGERTY & SILVERMAN, P.C.

DATE: 10/23/2020

By: 

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