

# LAMB | McERLANE<sup>PC</sup>

ATTORNEYS AT LAW

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Member of PA and FL Bar

December 18, 2014

Mr. John Andrews  
8011 Fairview Lane  
Eagleville, PA 19403

Re: Andrews v. Methacton Sch. Dist., No. 918 M.A.L. 2014

Dear Mr. Andrews:

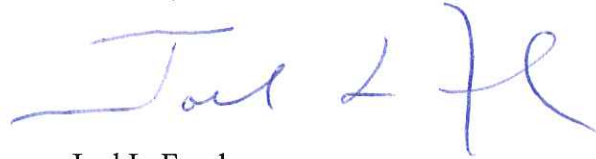
This firm has been retained as special counsel to the Methacton School District to handle the proceedings in the Supreme Court of Pennsylvania initiated by your filing of a petition for allowance of appeal. Although we have noted that you have filed that petition pro se, if you are represented by legal counsel, please direct this letter to your counsel immediately and have your counsel notify me of such representation.

We have reviewed the Commonwealth Court's December 4, 2014 Opinion, as well as your filed petition for allowance of appeal. We note that the Commonwealth Court summarily disposed of the issues raised in your appeal to that Court in an unpublished memorandum opinion, and that all of your claims were rejected by that Court as having no basis in law or fact, or as having been waived. The petition for allowance of appeal you have filed solely focuses on arguments running counter to settled rules of law, with virtually no prospect of success in the Supreme Court. Thus, we view the proceedings you have initiated in the Supreme Court, challenging the subject debt proceedings, as frivolous and having as their sole purpose to further delay the construction and renovation of the athletic facilities, ultimately causing the School District to needlessly incur additional legal fees and additional damages.

Accordingly, on behalf of the School District, we request that you promptly withdraw the petition for allowance of appeal. If you fail to do so, please be advised that the School District intends to file an application with the Commonwealth Court seeking an order directing you to post a significant appeal bond in order for your Supreme Court appeal to proceed. Moreover, the petition for allowance of appeal you have filed may be determined to be frivolous and/or taken solely for delay, potentially giving rise to an award of attorneys' fees and for damages for delay against you at the conclusion of the Supreme Court proceedings, pursuant to Pennsylvania Rules of Appellate Procedure 2744 and 2751.

Please inform me of your willingness to comply with this request at your earliest opportunity.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joel L. Frank". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a large, stylized "L" and "F" following.

Joel L. Frank

JLF/cd