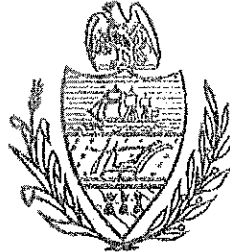


RTK REQUEST NUMBER

DATE RECEIVED

5 DAY RESPONSE DATE



COUNTY OF LUZERNE

**RIGHT TO KNOW LAW REQUEST FORM**

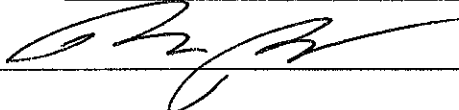
NAME OF REQUESTER: Picker Benjamin R  
(PLEASE PRINT CLEARLY) LAST FIRST MI

MAILING ADDRESS: McCausland Keen + Buckman, 80 W. Lancaster Avenue, 4th Floor  
STREET / P.O. BOX

Devon Pennsylvania 19333  
CITY STATE ZIP CODE

PHONE # 610-341-1000 FAX# 610-341-1099

EMAIL ADDRESS: bpicker@mkbattorneys.com

SIGNATURE:  DATE: 5/8/17

**RECORDS REQUESTED** - Requesters MUST specify the document(s) sought. Please use additional pages if necessary.  
 A full and complete copy of the settlement agreement in the case of Nichole Puscavage et al. v. Luzerne County Children and Youth Services et al., United States District Court for the Middle District of Pennsylvania, Case No. 3:16-cv-00035-RPC. It is believed that the settlement agreement was executed in March, April or May of 2017. See attached page for relevant case law.

**PLEASE CHECK ONE OF THE FOLLOWING:**  
 I AM ONLY REQUESTING ACCESS TO THE DOCUMENT(S)  
 I AM REQUESTING A HARD COPY OF THE DOCUMENT(S) (PAPER, CD, etc...)  
 I AM REQUESTING AN E-FILE OF THE DOCUMENT(S) (IF AVAILABLE) (PDF, EXCEL SPRDSHT, etc...)

PLEASE NOTE: LUZERNE COUNTY IS NOT REQUIRED TO CREATE A RECORD WHICH DOES NOT CURRENTLY EXIST OR TO COMPILE, MAINTAIN, FORMAT OR ORGANIZE A RECORD IN A MANNER IN WHICH THE AGENCY DOES NOT CURRENTLY COMPILE, MAINTAIN, FORMAT OR ORGANIZE THE RECORD

**Attachment to Right to Know Law Request to Luzerne County by Benjamin R. Picker**

See the following case law holding that a confidential settlement agreement is a public record subject to disclosure under the Right to Know Law despite any confidentiality provision therein:

Tribune-Review Publishing Company v. Westmoreland County Housing Authority, 574 Pa. 661, 833 A.2d 112 (2003).

Newspaper Holdings, Inc. v. New Castle Area School District, 911 A.2d 644 (Pa. Cmwlth. 2006).