



COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA

BERNADETTE HEENAN

vs.

COUNCIL ROCK SCHOOL DISTRICT

NO. 2024-01046

CIVIL COVER SHEET

State Rule 205.5 requires this form be attached to any document commencing an action in the Bucks County Court of Common Pleas. The information provided herein is used solely as an aid in tracking cases in the court system. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Name of Plaintiff/Appellant's Attorney: Jeffrey Hall-Gale, Esq., ID: 318850

Self-Represented (Pro Se) Litigant

Class Action Suit Yes No

MDJ Appeal Yes No

Money Damages Requested

Commencement of Action:

Amount in Controversy:

Complaint

\$50,000 or less

Case Type and Code

Miscellaneous:

Other

Other:

PA SUNSHINE ACT

Case# 2024-01046-0 - JUDGE:29 Received at County of Bucks Prothonotary on 02/20/2024 11:10 AM. Fee = \$283.25. The filer certifies 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. E-Filed by: Jeffrey Hall-Gale, Esq.

Jeffrey Hall-Gale, Esq.
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823 Stark Circle
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Email: jeffhallpa@gmail.com

IN THE COURT OF COMMON PLEAS
BUCKS COUNTY, PENNSYLVANIA

BERNADETTE HEENAN

Plaintiff

vs.

COUNCIL ROCK SCHOOL DISTRICT, COUNCIL
ROCK SCHOOL BOARD, ED TATE, in his capacity
as School Board Director and YOTA PALLI, in her
capacity as School Board Director
Defendants

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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 defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court 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 OFFICES SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Bucks County Bar Association
135 East State Street Doylestown, PA 18901
Phone (215) 348-9413, 1-800-479-8585
www.bucksbar.org
PA Bar Association: www.pabar.org

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Plaintiff

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COMPLAINT

1. Plaintiff, Bernadette Heenan, is a member of the public, residing in the Council Rock School District at 138 Highspire Rd, Richboro, PA 18954.
2. The First Defendant is Council Rock School District, Andrew J. Sanko, Superintendent, or his designee, with a principal place of business at 30 N Chancellor St., Newtown, PA 18940.
3. The Second Defendant is Council Rock School District School Board, Yota Palli, President, or her designee, with a principal place of business at 30 N Chancellor St., Newtown, PA 18940.
4. The Third Defendant is Ed Tate, Vice President of the Council Rock School Board, with a principal place of business at 30 N Chancellor St., Newtown, PA 18940.
5. The Fourth Defendant is Yota Palli, President of the Council Rock School Board, with a principal place of business at 30 N Chancellor St., Newtown, PA 18940.
6. The Bucks County Court of Common Pleas has jurisdiction over this matter pursuant

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to Article V, §5(b) (Courts of Common Pleas have “unlimited original jurisdiction in all cases except as may be otherwise provided by law”) and 231 Pa. Code § 2103.

7. On or about January 18, 2024, the Council Rock School Board announced that there was a working session on January 4, 2024 to discuss a working session to discuss personal issues and issues related to a bus company, Durham, used by the district. (Exhibit A).

8. In that January 4, 2024 working session, Durham, according to Board President Yota Palli at the February 15, 2024 meeting, had a presentation where it instituted a plan that was presented to the School Board and School Administration.

COUNT 1- SUNSHINE LAW VIOLATION

9. Paragraphs 1 through 6 are incorporated herein by reference as though set forth at length.

10. Upon information and belief, on or about January 4, 2024, The Council Rock School Board conducted deliberation or official actions regarding the Durham bus company through closed session or by email.

11. These deliberations or official actions included a presentation and implementation of a plan that took place in a working session on or about January 4, 2024 by the Council Rock School Board.

12. Upon information and belief, President of the Council Rock School Board, Yota Palli, allowed for official action or deliberation to include or exclude implementation of plans regarding Durham bus company during the January 4, 2024 working session.

13. The official action was vaguely discussed in the February 15, 2024 school board meeting.

14. The fact that a working session took place was announced at the January 18, 2024 school board meeting.

15. In sum, the implementation of a plan regarding Durham was conducted in a closed working session when it should have been in a public meeting.

16. Additionally, the Board should have had an executive session instead of a working session to discuss personnel issues related to Durham.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter an Order as follows: a. Granting Plaintiff its expenses, including reasonable attorney fees and costs incurred in connection with this action; b. Granting a re-consideration of the implementation of a plan regarding Durham so that it can be voted on in a public meeting; and c. granting such other relief as the Court deems equitable and just.

Dated: February 16, 2024

/s/ Jeff Hall-Gale, Esq.
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CERTIFICATION OF SERVICE

I hereby certify the foregoing has been served in person or by fax, email upon the following interested parties:

Council Rock School District
30 N Chancellor St.
Newtown, PA 18940

Dated: February 19, 2024

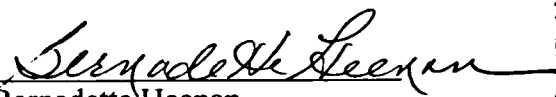
Respectfully Submitted,
/s/ Jeffrey F. Hall-Gale, Esq.
Attorney for Plaintiff

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VERIFICATION

Subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I declare that the statements of fact in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

Executed on February 19, 2024


Bernadette Heenan