

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

County of Fulton, Fulton County Board of	:	
Elections, Stuart L. Ulsh, in his official capacity	:	DOCKET NUMBER: 277 MD 2021
as County Commissioner of Fulton County and	:	3 MAP 2022
in his capacity as a resident, taxpayer and	:	
elector in Fulton County, and Randy H. Bunch,	:	
in his official capacity as County Commissioner	:	
of Fulton County and in his capacity as a resident,	:	
taxpayer and elector of Fulton County	:	
<i>Petitioners</i>	:	
	:	
V.	:	
Secretary of the Commonwealth,	:	
<u><i>Respondent</i></u>	:	

EMERGENCY MOTION TO ADJOURN PROCEEDINGS

THOMAS J CARROLL, Attorney for Petitioners/Appellees (hereinafter Petitioners), moves the Court for an adjournment of the Hearing for purposes of the Special Master’s appointment of a neutral third-party agent and states as follows:

1. On August 26, 2023, Counsel for Petitioners went to an urgent care facility, as he was experiencing severe right upper quadrant abdominal pain. The urgent care facility was not capable of providing treatment for his condition and the urgent care facility instructed Mr. Carroll immediately go to the Emergency Room.

2. On August 26, 2023, Mr. Carroll went directly to Paoli Hospital Emergency Room and was diagnosed with a broken rib and an infection. Attached hereto and made a part hereof is the redacted “After Visit Summary” and marked as Exhibit “A”.

3. Counsel for Petitioner was prescribed Opioid medication for the pain and an Antibiotic for the infection. The Opioid medication has warnings to not drive or operate machinery while taking it. Said Warnings are contained on the prescription pill bottle and on page 1 of the After Visit Summary. Attached hereto and made a part hereof is the redacted “After Visit Summary” and marked as Exhibit “A”.

4. Counsel for Petitioner was provided a letter from the Emergency Department that confirms he was seen and treated in the Paoli Hospital Emergency Room on August 26, 2023. In consideration of the medical condition, which is involved in this situation, the letter further states that Mr. Carroll can return to work on 08/30/2023. Attached hereto and made a part hereof is the “Paoli Hospital Letter” and marked as Exhibit “B”.

5. Counsel for Petitioner continues to be in significant pain as a result of both The broken rib and the infection and as a result of the pain and the taking of the prescribed medications cannot be available for the Hearing pursuant to Doctor’s Orders.

WHEREFORE, for the reasons stated in this Emergency Motion to Adjourn Proceedings respectfully requests this Court to grant its Motion to Adjourn Oral Argument.

Respectfully submitted by:

A handwritten signature in blue ink, appearing to read 'T. Carroll', is written over a horizontal line.

Attorney ID: 53296

Attorney for Petitioners

LAW OFFICE OF THOMAS J CARROLL

224 King Street

Pottstown, PA, 19464

(610)419-6981

tom@thomasjcarrolllaw.com

EXHIBIT "A"



AFTER VISIT SUMMARY

Thomas Carroll MRN: [REDACTED] 8/26/2023 Paoli Hospital Emergency Department 484-565-1043

Instructions



Your medications have changed

- ➔ START taking:
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

Review your updated medication list below.



Read the attached information

- [REDACTED] Infection Adult (English)
- Rib Fracture (English)



Pick up these medications at Gateway Pharmacy

[REDACTED]
[REDACTED]
[REDACTED]
Address: [REDACTED]
Phone: [REDACTED]

Today's Visit

Your care team consisted of: [REDACTED]
[REDACTED], [REDACTED], PA-C

Diagnoses

- Right upper quadrant abdominal pain
- Closed fracture of one rib of right side, initial encounter
- [REDACTED] infection with [REDACTED]

Lab Tests Completed

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Reflex to Culture (Macroscopic)

Lab Tests in Progress

[REDACTED]

Imaging Tests

CT ABDOMEN PELVIS WITH IV CONTRAST
ECG 12 lead

Medications Given

[REDACTED]



Blood Pressure
[REDACTED]



Temperature (Temporal)
[REDACTED]



Pulse
[REDACTED]



Respiration
[REDACTED]



Oxygen Saturation
[REDACTED]

What's Next

You currently have no upcoming appointments scheduled.

Additional Information

Sedative / Opioid Instructions:

You were prescribed a sedative and/or opioid pain medication:

- Do not drive, work or operate heavy machinery while taking this medication.
- Do not drink alcohol while taking this medication.
- Only take the medication exactly as prescribed.
- Side effects of opioids include drowsiness, confusion, nausea, vomiting, slowed breathing and constipation.
- Side effects of sedatives include drowsiness, light-headedness, confusion, unsteadiness and dizziness.

EXHIBIT "B"

August 27, 2023



Paoli Hospital
Main Line Health®

Patient: Thomas Carroll
Date of Birth: [REDACTED]
Date of Visit: 8/26/2023

Department Information: 255 W. LANCASTER
AVENUE
PAOLI PA 19301
484-565-1000

To Whom It May Concern:

Thomas Carroll was seen and treated in our emergency department on 8/26/2023.
Thomas Carroll may return to work on 08/30/2023.

If you have any questions or concerns, please don't hesitate to call.

A handwritten signature in black ink, appearing to read "Susanne M. Collins".

Collins, Susanne M, PA C

VERIFICATION

I, Thomas J. Carroll, Esquire, in the foregoing matter, hereby verify that the statements made in the foregoing Emergency Motion to Adjourn Proceedings are true correct to the best of my knowledge, information and belief. **The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. section 4904 relating to unsworn falsification to authorities.**

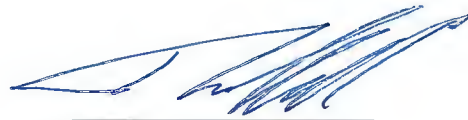


Date: 8/28/2023

CERTIFICATION REGARDING PUBLIC ACCESS POLICY

I 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.

Dated: August 28, 2023



Thomas J. Carroll