

# Exhibit C

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

**ROBERT M. OWSIANY and  
EDWARD F. WISNESKI**

Plaintiffs,

v.

**THE CITY OF GREENSBURG, BERNARD  
T. McARDLE, and SUSAN M. TROUT,**

Defendants.

Case No.:

**DECLARATION OF ROBERT GOLDMAN**

I, Robert Goldman, attorney at law, hereby declare, under penalty of perjury, the following to the best of my knowledge, information and belief:

1. I am a licensed attorney in the Commonwealth of Pennsylvania.
2. I am a solo practitioner practicing at the Law Offices of Robert Goldman, located at 300 Mt. Lebanon Blvd. Suite 212, Pittsburgh, PA 15234.
3. On or about June 12, 2014 I filed a Notice of Intent to Sue the City of Greenburg (the "Notice"). A copy of the aforesaid letter is attached hereto as Exhibit 1.
4. The Notice was filed on behalf of my client, who was contemplating filing a 42 U.S.C. § 1983 lawsuit against a Greensburg City police officer.
5. On or about December 18, 2014, prior to the start of the Summary Trial Hearing, Bernard T. McArdle, Esquire ("McArdle") approached me in the Westmoreland County Court of Common Pleas Courthouse.
6. McArdle handed me his business card and asked me if I knew a "Bob Owsiany." A copy of the aforesaid business card is attached hereto as Exhibit 2.

7. McArdle suggested that I “find out” who Bob Owsiany was, because, as McArdle put it: “if you file a civil-rights suit against Greensburg police, we’ll do the same to you as we did to him.”

I declare the foregoing to be true and correct to the best of my knowledge, information and belief.

Dated: *Nov 24, 2015*

  
Robert Goldman

**ROBERT A. GOLDMAN**

Attorney-at-Law  
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Pittsburgh, PA 15234  
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June 12, 2014

Pennsylvania Office of Attorney General  
16<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

City of Greensburg  
Attn: Municipal Manager  
416 South Main Street  
Greensburg, PA 15601

**Re: Notice pursuant to 42 Pa C.S. section 5522**

To whom it may concern:

This letter shall constitute notice pursuant to the above referenced statute requiring notice to Commonwealth agencies of potential civil actions against a government unit.

1. The party to whom the action has accrued is [REDACTED].
2. The party injured is [REDACTED].
3. The incident occurred on or about April 27, 2014.
4. The location of the incident is the Rialto Café and sidewalk outside, 25 W. Otterman Street, Greensburg, PA 15601.
5. The attending physician Emergency Room, Westmoreland Hospital.

Sincerely,



Robert Goldman



**BERNARD T. McARDLE**

**ATTORNEY AT LAW**

**Stewart, McArdle, Sorice, Whalen, Farrell, Finoli & Cavanaugh, LLC**

**229 South Maple Avenue  
Greensburg, PA 15601-3242**

**(724) 838-1016 ext. 10**

**[bmcardle@greensburglaw.com](mailto:bmcardle@greensburglaw.com)**

