

Joseph Pilchesky,

Plaintiff,

v.

Judy Gatelli, as President of Scranton City  
Council; as Councilwoman; and, in her  
Individual capacity,

Defendant,

v.

Joanne Pilchesky, John Doe, a/k/a 1 Musketeer,  
John Doe, a/k/a 3blindrats, John Doe, a/k/a 666,  
John Doe, a/k/a 1935, John Doe, a/k/a A man named  
Jed, Jane Doe, a/k/a abbey, John Doe, a/k/a Adam,  
John Doe, a/k/a Anti oppression, John Doe, a/k/a  
Antisystemicmovements, John Doe, a/k/a aquamg,  
John Doe, a/k/a atty skeletor, John Doe, a/k/a baron,  
John Doe, a/k/a bigdaddy, John Doe, a/k/a Black  
helicopters, John Doe, a/k/a Black Lung, John Doe,  
a/k/a BoobyMcGoof, Jane Doe, a/k/a bo peep,  
John Doe, a/k/a Brainwashed, John Doe, a/k/a Chris,  
John Doe, a/k/a City Haul, John Doe, a/k/a clarks  
summit luv nest, John Doe, a/k/a commoner,  
John Doe, a/k/a Council rat, John Doe, a/k/a Crazy  
Otto, John Doe, a/k/a Crony watcher, John Doe, a/k/a  
cyberlion, John Doe, a/k/a DarthArt, John Doe, a/k/a  
DeerParkerLumber, John Doe, a/k/a Deleware,  
John Doe, a/k/a Dice Rolling 101, John Doe, a/k/a  
Don't fear government, John Doe, a/k/a Eye for an  
Eye, John Doe, a/k/a ezeddie, John Doe, a/k/a flower  
child, John Doe, a/k/a Freedom is not free, John Doe,  
a/k/a FRICKELLMOIE, Jane Doe, a/k/a Gatellis  
blue dress, John Doe, a/k/a Gimme a break, Jane Doe,  
Granma, John Doe, a/k/a Hammer, John Doe, a/k/a  
Hitlers downfall, John Doe, a/k/a History writer,  
John Doe, a/k/a Intelligent thinker, John Doe, a/k/a  
insider, John Doe, a/k/a Irish Eyes are not Shining,  
John Doe, a/k/a Isnt that lovely, John Doe, a/k/a  
jimbui5, Jane Doe, a/k/a Judy, Jane Doe, a/k/a June  
Cleaver, John Doe, a/k/a JustTheFacts, Jane Doe,  
a/k/a Katie, John Doe, a/k/a Liberty is expensive,  
Jane Doe, a/k/a Lipstick and lashes, John Doe, a/k/a

: IN THE COURT OF COMMON PLEAS  
: OF LACKAWANNA COUNTY, PA

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: CIVIL ACTION  
: No. 2007-CV-1838

Lobby cyst, John Doe, a/k/a methinks4myself, :  
 John Doe, a/k/a Milo Ferlicker, John Doe, a/k/a :  
 MistyMtTop, John Doe, a/k/a Money stalks, :  
 John Doe, a/k/a Moving Forward, John Doe, a/k/a :  
 Newsroom, Jane Doe, a/k/a newgirl, John Doe, a/k/a :  
 Nobody, John Doe, a/k/a NoRepresentation, :  
 Jane Doe, a/k/a NotADumbBlonde, Jane Doe, a/k/a :  
 Once upon a secretary, John Doe, a/k/a Paul, :  
 John Doe, a/k/a peewee, John Doe, a/k/a phoenix, :  
 John Doe, a/k/a Pilcheskytics, John Doe, a/k/a :  
 Logic, John Doe, a/k/a Political sex, John Doe, a/k/a :  
 powertothepeople, John Doe, a/k/a Sacred Heart of :  
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 The Mole, Jane Doe, a/k/a themom, John Doe, a/k/a :  
 The next generation, John Doe, a/k/a Traditional :  
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 so screwed, John Doe, a/k/a wildabeast, John Doe, :  
 a/k/a Wolf pack, Jane Doe, a/k/a Working woman, :  
 John Doe, a/k/a XraYspX, John Doe One, John Doe :  
 Two, John Doe Three, John Doe Four, John Doe :  
 Five, John Doe Six, John Doe Seven, John Doe :  
 Eight, John Doe Nine, and John Doe Ten, :

Additional Defendants. :

**AFFIDAVIT OF JUDY GATELLI IN SUPPORT OF HER AMENDED PETITION TO  
 COMPEL DISCLOSURE OF THE IDENTITIES OF ADDITIONAL DEFENDANTS**

I, Judy Gatelli, being of sound mind, do hereby depose and state:

1) I am currently the President of Scranton City Council.

2) The purpose of this Affidavit is to support my Amended Petition to Compel Disclosure of the Identities of Additional Defendants (“Amended Petition”). In my Amended Petition, I have sought the identity of certain Additional Defendants specifically identified therein (“Additional Defendants”).

3) Those Additional Defendants have accessed the internet via [www.dohertydeceit.com](http://www.dohertydeceit.com) and used the Dohertydeceit.com website and message board to publish

scandalous, impertinent and defamatory statements pertaining to me and my character.

4) Those statements have been specifically identified in my Amended Petition (“Statements”).

5) The Statements are plainly false.

6) Specifically, I am a heterosexual monogamous married woman. To this end, I have never engaged in any type of sexual relations with Mayor Christopher Doherty or any other individual specifically identified or identified by innuendo in said Statements. Consequently, any Statements pertaining to me as a “Doherty blowjob,” “bimbo,” “whore”, “dyke”, and/or “butch” or a woman who wears “knee pads,” engages in “prostitution,” is “bought and paid for,” “on her knees,” and/or “used and owned” and the like are patently false and defamatory.

7) Similarly, I am not racist. Any and all Statements likening me to Hitler --“Judy the Doobie Hitler Butch,” “Hitler,” “Nazi,” “Nazi dyke,” “Nazi Gatelli (Seig Hiel),” and “Nazi villain”-- are equally defamatory and completely untrue.

8) I have also never been convicted of a crime. Consequently, any Statements that I am a “thief,” “crook,” “corrupt thief” or that I am guilty of “stealing” or “thieving” and the like are evidently false and defamatory.

9) Moreover, I am not a “political puppet” for the Administration of the City of Scranton. In this regard, any Statements likening me to a “rubber-stamper,” “crooked backdoor spineless follower,” “mechanical manakin with some computer chips...missing,” who would “never let my master down,” are clearly untrue and defamatory.

10) Finally, the defamatory Statements that I am a “hypocrite in practicing my Catholic faith,” “lying bitch,” “pig,” “scumbag,” “historically repulsive political figure,” “lunatic,” “cheat,” “corrupt,” “cancer,” “betrayed,” and/or “political maggot” and/or similar

Statements of this caliber are certainly false.


11) The Statements have caused harm to my reputation in the social, civil, professional and political communities.

12) Said Statements have also caused me severe emotional distress and anxiety. In this regard, the Additional Defendants were and are fully aware of the effect their Statements have had and continue to have on me, however, they intentionally continue to harass and defame me.

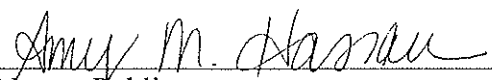
13) Specifically, Additional Defendants have stated that I am: "overmedicated," "not doing well emotionally," "losing it," "near the edge now and ...not good for much more," "headed for a meltdown," "in need of emotional maintenance." Additional Defendants have also stated that I "can't handle the pressure" and that I "will erupt sooner or later, meds or not". Moreover, several Statements reference a "payback" as well as a "contest to see who could publicly humiliate me more."

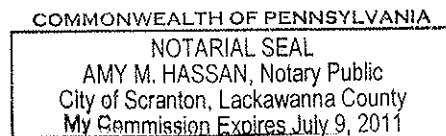
14) As a result of the Statements, I have suffered and continue to suffer from severe emotional distress and anxiety.

15) To this end, I have sought medical attention and am currently taking medications for my distress and anxiety.

  
\_\_\_\_\_  
Judy Gatelli

Sworn to and subscribed before me  
this 20<sup>th</sup> day of March, 2008.

  
\_\_\_\_\_  
Notary Public



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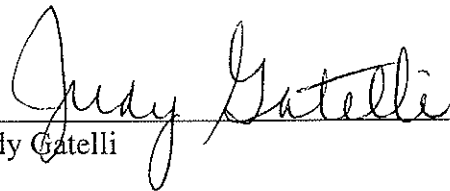
I, Judy Gatelli, being of sound mind, do hereby depose and state:

- 1) I am currently the President of Scranton City Council.
- 2) The purpose of this Affidavit is to support my Amended Petition to Compel Disclosure of the Identities of Additional Defendants (“Amended Petition”). In my Amended Petition, I have sought the identity of certain Additional Defendants specifically identified therein (“Additional Defendants”).
- 3) The identities of the Additional Defendants are relevant and necessary for me to proceed forward with my claims because in order for the above-referenced civil action to be

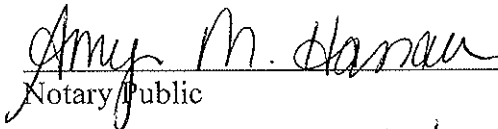
timely commenced and initial process to be served, I must obtain the identities of Additional Defendants.

4) I have sought the identities of the Additional Defendants in good faith and not for some improper purpose. In fact, my primary motivation is to obtain the relief requested in my Answer, New Matter and Counterclaims, as well as my Joinder Complaint.

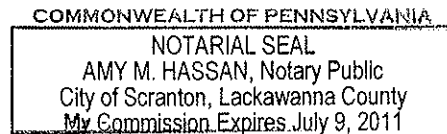
5) I cannot obtain the identities of the Additional Defendants by any reasonably alternative means.

  
\_\_\_\_\_  
Judy Gatelli

Sworn to and subscribed before me  
this 20<sup>th</sup> day of March, 2008.

  
\_\_\_\_\_  
Notary Public

Commission Expires: 7/9/2011



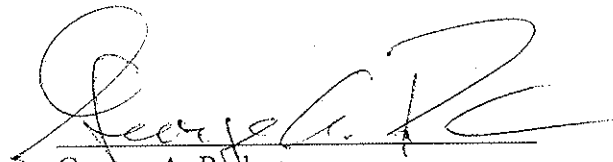
**CERTIFICATE OF SERVICE**

I, GEORGE A. REIHNER, hereby certify that on this day a true and correct copy of the foregoing Amended Petition was served upon counsel of record by first class mail, postage prepaid as follows:

Paul Alan Levy, Esq.  
Public Citizens Litigation Group  
1600-20<sup>th</sup> Street, N.W.  
Washington, D.C. 20009

Joseph Pilchesky  
819 Sunset Street  
Scranton, PA 18509

Joanne Pilchesky  
819 Sunset Street  
Scranton, PA 18509

  
George A. Reihner

Dated: March 20, 2008