



# Ricci Tyrrell Johnson & Grey

ATTORNEYS AT LAW

## QUARTERLY NEWSLETTER

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### News and Events:



*RTJG Members Fran Grey and John Tyrrell at the 2021 Corporate Leadership Award Dinner in New York*

**RTJG** Members **Francis J. Grey, Jr., John E. Tyrrell** and **Brian Wolensky** all attended the **PLAC** ("Product Liability Advisory Council") semi-annual meeting in September held at **The Broadmoor** in Colorado Springs. This was the first in-person PLAC event since the onset of The Pandemic. PLAC is a not-for-profit association of product manufacturers, suppliers, retailers and select regulatory, litigation and appellate professionals who work to shape the common law of product liability and complex regulation, provide guidance on changing regulations and strategically help corporations manage risk throughout the entire product life cycle.

**John Tyrrell** and Firm Associate **Vikas Bowry** authored an article in the July-August 2021 edition of **Sports Facilities and the Law**. The article considered the impact of Governmental Immunity for injuries sustained on school grounds in a Michigan lawsuit.

Founding Member **Bill Ricci** served as an introductory moderator and panelist for the **Philadelphia Association of Defense Counsel (PADC)** presentation "Lessons from the Cosby Reversal: The Fifth Amendment and Prior Bad Acts".

**Mr. Ricci** also served as co-host on September 9, 2021 for a webinar with Philadelphia Court of Common Pleas judges detailing resumption of in-person civil jury trials.

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### ACCOMMODATIONS FOR MENTAL HEALTH IN THE WORKPLACE



**Laquan T. Lightfoot** is an Associate at **Ricci Tyrrell Johnson & Grey**.

According to the National Institute of Mental Health Disorder, mental health disorders account for several of the top causes of disability in established market economies, such as the U.S. and include: major depression, manic depression (also called bipolar disorder), schizophrenia, and obsessive-compulsive disorder.<sup>1</sup> Approximately 18% of people ages 18-54 have an anxiety disorder in a given year. Anxiety disorders include: panic disorder, obsessive-compulsive disorder (OCD), post-traumatic stress disorder (PTSD), generalized anxiety disorder (GAD), and phobias (social phobia, agoraphobia, and specific phobia).<sup>2</sup>

The COVID-19 crisis has called a lot into question, including mental health concerns and the procedure with which to handle such claims in the workplace. The Centers for Disease and Control and Prevention, the Occupational Safety and Health Administration, Department of Labor and the Equal Employment Opportunity Commission ("EEOC") have consistently published updated guidance protocols addressing a myriad of issues related to COVID-19, including accommodations and disability related inquiries for medical and mental health conditions alike. At issue is how to assess and what constitutes proper reasonable accommodations for those individuals with a qualified disability due to their underlying mental health condition, particularly those exacerbated by COVID-19. Under the Americans with Disabilities Act ("ADA") (1) no covered employer shall discriminate against a "qualified employee with disability" and (2) a "qualified employee with disability" is an individual with disability who, with or without reasonable accommodation, can perform

essential functions of employment position that such individual holds or desires.<sup>3</sup>

According to the Fisher Phillips COVID-19 Employment Litigation Tracker, more than 3,400 COVID-19 related cases have been filed nationwide, with a majority of those cases stemming from remote work and leave accommodation conflicts.<sup>4</sup> On March 26, 2021, a woman named Dolores Loftus filed a complaint in the United States Middle District of Florida against her employer, The School Board of Lee County, Florida, alleging disability discrimination under the Americans with Disabilities Act and The Rehabilitation Act.<sup>5</sup> Loftus asserted that she suffers from panic disorder with agoraphobia, PTSD, and generalized anxiety disorder, which was exacerbated by the COVID-19 pandemic.<sup>6</sup> She further alleged that her request for an accommodation to continue working remotely due to her mental health conditions was denied when the School Board requested the return of all employees for face-to-face contact in September of 2020.<sup>7</sup> Similarly, on September 7, 2021, the EEOC filed suit against ISS Facility Services, Inc. for disability discrimination when it denied an employee's remote work accommodation request, and then fired her for making the request, due to her physical health condition which increased her risk of contracting COVID-19.<sup>8</sup> The EEOC alleged that the employer's actions violated the ADA when it denied the accommodation especially when it allowed other employees to work from home.<sup>9</sup> While the above cases are in their infancy, litigation regarding whether leave and telework are reasonable accommodations has historically existed. On February 4, 2019, the U.S. Court of Appeals for the Eighth Circuit

<sup>3</sup> 42 USCS §§ 12101 *et seq.*

<sup>4</sup> *COVID-19 Employment Litigation Tracker And Insights*, Fisher Phillips, <https://www.fisherphillips.com/innovations-center/covid-19-employment-litigation-tracker-and-insights.html>, (last visited September 21, 2021).

<sup>5</sup> *Dolores Loftus v. The School Board of Lee County, Florida*, U.S.D.C. for the Middle District of Florida – Fort Myers Division, 2:21-cv-00261-JES-NPM

<sup>6</sup> *Rd.*

<sup>7</sup> *Id.*

<sup>8</sup> *EEOC Sues ISS Facility Services for Disability Discrimination*, September 7, 2021, U.S. Equal Employment Opportunity Commission, <https://www.eeoc.gov/newsroom/eeoc-sues-iss-facility-services-disability-discrimination>. See also *Equal Employment Opportunity Commission v. ISS Facility Services, Inc.*, U.S.D.C. for the Northern District of Georgia, Atlanta Division, 1:21-cv-3708-SCJ-RDC.

<sup>9</sup> *Id.*

<sup>1</sup> *Mental Health Disorder Statistics*, Johns Hopkins Medicine, <https://www.hopkinsmedicine.org/health/wellness-and-prevention/mental-health-disorder-statistics>

<sup>2</sup> *Id.*

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affirmed the United States District Court for the District of Minnesota's decision to grant summary judgment in favor of an employer, the City of Oak Park Heights, against its employee, Gary Brunckhorst, for denying a remote work accommodation request.<sup>10</sup>

Brunckhorst requested to work remotely upon his return from leave after contracting a life-threatening disease from flesh-eating bacteria.<sup>11</sup> The City of Oak Park Heights denied his request and subsequently fired him, which the Eighth Circuit affirmed holding that an employer is not obligated to accommodate an employee's request based on an employee's preference to do so.<sup>12</sup> Yet, on October 3, 2019, in *Rochelle Garrison v. Dolgencorp, LLC et al*, the U.S. Court of Appeals for the Eighth Circuit denied summary judgment and held that an employee's ADA reasonable accommodation claim could proceed where the employer, Dollar General, denied a leave accommodation request for anxiety, depression and migraine headaches.<sup>13</sup> In *Garrison*, it was demonstrated that Dollar General was on notice of Garrison's disability, despite not using the legal terms "accommodation" or "disability" when making her request. *Id.*

The above cases highlight the fact that workplace accommodations pre- and post-pandemic have and continue to be made on a case-by-case basis. Nevertheless, it has been predicted that remote work and leave accommodation requests for mental health conditions could significantly increase given the psychological distress triggered by the pandemic.<sup>14</sup> Eighteen (18) months into the pandemic, the challenge to balance work and life is at an all-time high for employers and employees alike. Anxiety, depression and stress levels have surged largely due to financial constraints, physical health concerns and the overall uncertainty of what lies ahead. "Although many people

feel significant stress due to the COVID-19 pandemic, employees with certain preexisting mental health conditions, for example, anxiety disorder, obsessive-compulsive disorder, or post-traumatic stress disorder, may have more difficulty handling the disruption to daily life that has accompanied the COVID-19 pandemic."<sup>15</sup>

Thus, it appears to be advantageous for employers and employees alike to continue to move away from the taboo of acknowledging the importance of mental health, engage in healthy communication and promote education on mental health resources. According to the American Psychiatric Association, the Center for Workplace Mental Health provides the following recommendations for employers to support employees transitioning back to the workplace:

1. Understand concerns;
2. Communicate often and be transparent – Keep employees informed about plans and changes in policies and procedures and encourage open discussion about experiences and concerns with transitioning back;
3. Make employee mental health a visible priority – Make sure employees are aware of the mental health services and resources available to them and create an environment where people are comfortable talking about mental health and accessing services when needed;
4. Stay flexible – Anticipate the need to be flexible as people transition to new schedules, new commutes and new routines; and
5. Promote resiliency – Offer opportunities for mindfulness practices, create a healthy work environment prioritizing reasonable work hour limits and promoting physical health.<sup>16</sup>

<sup>10</sup> *Gary Brunckhorst v. City of Oak Park Heights*, 914 F.3d 1177 (2019)

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* At 1182-83.

<sup>13</sup> *Rochelle Garrison v. Dolgencorp, LLC and Sandra Bell*, 939 F.3d 937 (2019).

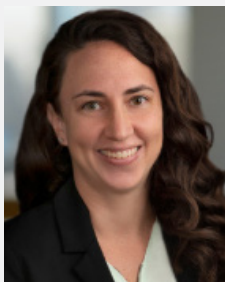
<sup>14</sup> Paige Smith, *Virus Mental Health Issues Complicate Legal Gray Area Over Leave*, June 1, 2020, Bloomberg Law, <https://news.bloomberglaw.com/daily-labor-report/virus-mental-health-issues-complicate-legal-gray-area-over-leave>

<sup>15</sup> *What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws*, U.S. Equal Employment Opportunity Commission, <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws#D> (last visited September 21, 2021).

<sup>16</sup> *APA Offers Advice on Coping with Stress and Mental Health When Considering a Return to the Workplace*, August 5, 2021, American Psychiatric Association, <https://www.psychiatry.org/newsroom/news-releases/apa-offers-advice-on-coping-with-stress-and-mental-health-when-considering-a-return-to-the-workplace>

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### WAIVER OF PRIVILEGES: ATTORNEY-CLIENT V. WORK PRODUCT



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In the case of *Carlino E. Brandywine, L.P. v. Brandywine Vill. Assoc.*, No. 1194 EDA 2019 (Pa. Super. July 23, 2021) a two-judge panel of the Pennsylvania Superior Court (Stabile, J., McLaughlin, J., Stevens, P.J.E.) (Op. by Stabile, J.), vacated a trial court's decision in a land dispute matter and remanded a case for further proceedings, after ruling that, where Defendants raise the affirmative defenses of reliance upon advice of counsel and counsel's good faith reliance upon applicable law, the Defendants opened the door to a blanket waiver of the attorney-client and the work product privileges. Specifically, the trial Court held: "[o]nce privileged documents are produced, as a result of waiver of attorney-client privilege, there is no reason to withhold the related work product." The Pennsylvania Superior Court limited the trial court's decision by finding that the trial court erred in finding a blanket privilege waiver and in assuming that a waiver of the attorney-client privilege would also necessarily waive the attorney work product protection.

Objections to discovery requests based on attorney client privilege and the work product doctrine are almost always asserted simultaneously as if the two are interchangeable: which is how they were analyzed by the trial court in *Brandywine*. However, as clarified by the Superior Court, while closely related, the work product doctrine and attorney-client privilege are distinct privileges, belonging to different individuals, for different purposes.

In fact, the work product doctrine is not a privilege, but rather a rule, embodied in Pa.R.C.P. No. 4003.3. However, it is not uncommon to see the doctrine also referred to as a privilege. See *Gillard v. AIG Insurance Company*, 15

A.3d 44, 55 n.16 (Pa. 2011); *Gocial v. Independence Blue Shield*, 827 A.2d 1216, 1222 (Pa. Super. 2003) (referring to both the work-product doctrine and the work-product privilege). Pennsylvania Rule of Civil Procedure 4003.3 precludes discovery of "the mental impressions of a party's attorney or his or her conclusions, opinions, memoranda, notes or summaries, legal research or legal theories." The work product doctrine belongs to the attorney, not the client, and broadly protects most aspects of an attorney's work in representing a client. The underlying purpose of the work product doctrine is to shield the mental processes of an attorney, providing a privileged area within which he or she can analyze and prepare the client's case. It enables attorneys to prepare cases without any risk that their own work will be used against their clients.

In contrast, the attorney-client privilege in Pennsylvania is statutory. This statute, 42 Pa.C.S.A. § 5928, reads: "[i]n a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client."

Neither privilege is absolute, and both can be waived. Waiver considerations with respect to each of these privileges are not the same and must be examined separately. The waiver analysis is driven by the purpose of each privilege. The purpose of the attorney-client privilege is to protect confidential communications between counsel and their clients, whereas work product protection is designed to protect against disclosure of the mental impressions and processes of an attorney to opposing counsel. *BouSamra v. Excela Health*, 210 A.3d 967, 978 (Pa. 2019).

The attorney-client privilege is waived when a confidential communication made by the client is disclosed outside the attorney-client relationship. The work product doctrine is only waived when the work product is shared with an adversary, or disclosed in a manner that significantly increases the likelihood that an adversary or anticipated adversary will obtain it.

While the attorney-client privilege is waived when a confidential communication is disclosed outside the

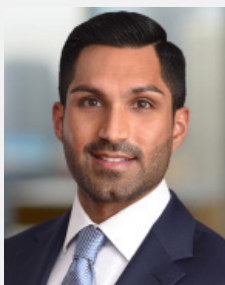


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attorney-client relationship, the failure to maintain strict confidentiality over work product will not result in waiver if work product is not disclosed in a manner likely to reach an adversary. In other words, while the mere showing of a voluntary disclosure to a third person will generally suffice to show waiver of the attorney-client privilege, this alone is insufficient to establish waiver of the work product privilege as disclosure does not always undermine the purpose of the work product doctrine – to protect attorneys’ work from their adversaries. The trial Court in *Brandywine* confused the work-product doctrine with the attorney-client privilege when it assumed that a waiver of the attorney-client privilege would also necessarily waive the attorney work product protection.

It is worth noting that privilege waivers do not waive the attorney-client privilege or work product doctrine as to all material counsel may possess. The scope of waiver of privileged material must be determined by the extent to which the privileged material has been placed in issue. To that end, it requires an issue-specific analysis. The most practical way to assert and preserve all privileges is to provide a detailed privilege log. Contrary to the decision by the trial court in *Brandywine*, Pennsylvania Courts have never endorsed a blanket disclosure of all documents, even when disclosure has been ordered as a sanction.

### GETTING PERSONAL: SUPREME COURT ANALYSIS OF PERSONAL JURISDICTION IN PRODUCTS LIABILITY SUITS



**Vikas Bowry** is an Associate at  
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On March 25, 2021, the U.S. Supreme Court issued a decision analyzing personal jurisdiction as it related to a product liability suit in *Ford Motor Co. v. Mont. Eighth Judicial Dist. Court*, 141 S. Ct. 1017 (U.S. March 25, 2021).

By way of a brief background, Ford Motor Company (hereinafter “Ford”) is incorporated in Delaware and headquartered in Michigan and markets, sells, and services its products throughout the United States and overseas. *Id.* Ford was a defendant in two products-liability lawsuits in which the state court exercised jurisdiction over it. *Id.* The lawsuits both arose from motor vehicle accidents that injured a resident in the State. *Id.* In the first suit, Markkaya Gullett was the operator of a 1996 Explorer when the tread separated from one of the rear tires of the vehicle. *Mont. Eighth Judicial Dist. Court*, 141 S. Ct. at 1023. The accident resulted in fatal injuries and the representative of Gullett’s estate sued Ford in Montana State Court for claims based on design defect, failure to warn, and negligence. *Id.* The second suit was brought by Adam Bandemar who was a passenger in a friend’s 1994 Crown Victoria when the vehicle rear-ended a snowplow. *Id.* The airbags of the vehicle failed to deploy resulting in Bandemar sustaining serious brain damage. *Id.* Bandemar sued Ford in Minnesota state court with claims sounding in products-liability, negligence, and breach of warranty. Ford moved to dismiss both Gullett and Bandemar’s suits for lack of personal jurisdiction. *Id.* The gravamen of Ford’s argument was that each state court could only exercise jurisdiction if Ford’s conduct in that particular state had given rise to the plaintiffs claim. *Mont. Eighth Judicial Dist. Court*, 141 S. Ct. at 1023. Ford further argued that this causal link could be established if it had designed, manufactured, or sold the subject vehicles within the state. However, this was not the case, as the subject vehicles were designed and manufactured in other states. Moreover, the subject vehicles had not been sold within the forum states. *Id.* The supreme courts of both Montana and Minnesota were not persuaded by Ford’s argument. *Id.* The courts held that Ford’s activities in each respective state were sufficient to establish a connection to the plaintiff’s allegations regarding the defective vehicles. *Id.* The U.S. Supreme Court granted *certiorari* to consider whether Ford was subject to jurisdiction in both of the aforementioned cases. *Mont. Eighth Judicial Dist. Court*, 141 S. Ct. at 1024.

The Court began its analysis by referring to the “canonical decision” of *International Shoe Co. v. Washington*. 326 U. S. 310. 66 S. Ct. 154. 90 L. Ed. 95 (1945), in which it was held that “a tribunal’s authority depends on the defendant’s having such “contacts” with the forum State that the maintenance of the suit is reasonable, in the context of our federal system of government, and does

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not offend traditional notions of fair play and substantial justice.” *Id.* In addressing the arguments set forth by Ford, the Court stated that there was no precedent which suggested that a strict causal relationship between the defendant’s in-state activity and the litigation was necessary. *Id.* Instead, what is needed is that the suit arises out of or relates to the defendant’s contacts with the forum state. *Id.* The Court highlighted the business that Ford regularly conducts in Montana and Minnesota, specifically, the billboard, television and radio commercials, print advertisements, and direct mail in which residents of both states are encouraged to purchase Ford vehicles. *Id.* at 1028. Additionally, the Court drew attention to the fact that Ford’s dealers in Montana and Minnesota regularly maintain and repair Ford vehicles and Ford distributes replacement parts to its dealers and also independent auto shops in both states. *Id.* In the eyes of the Court, “Ford had systematically served a market in Montana and Minnesota for the very vehicles that the plaintiffs allege malfunctioned and injured them in those states.” *Id.* As a result, there was a strong relationship between the defendant, the forum, and the litigation, which according to the Court, is the foundation of specific jurisdiction. *Id.*

In further support of its position, the Court stated that by conducting substantial business in Montana and Minnesota, Ford “enjoys the benefits and protection of their laws – the enforcement of their contracts, the defense of property, the resulting formation of effective markets.” *Id.* at 1029. As a result, reciprocal obligations are created in which the vehicles that Ford markets in Montana and Minnesota be safe for citizens use within the respective states. *Id.* Based on prior precedent, the Court unequivocally stated that “[a]n automaker regularly marketing a vehicle in a State has clear notice that it will be subject to jurisdiction in the State’s courts when the product malfunctions there (regardless of where it was first sold)” *Id.* at 1030.

Lastly, the Court found that principles of “interstate federalism” supported jurisdiction over both suits. *Id.* Specifically, both Montana and Minnesota had significant interests at stake, which included providing their residents with a convenient forum within which to litigate claims arising out of actions by out-of-state actors and enforcing their own safety regulations. *Id.*

This was contrasted with the interests of the states in which the vehicles were first sold, Washington and North Dakota. The Court emphasized the fact that for each of those states, the matters involve out-of-state parties, an out-of-state accident, and out-of-state injuries. *Id.* As a result, the only connection that the suits would have with Washington and North Dakota is that the subject vehicles were purchased there. *Id.* The relationship between the defendant, the forum, and the litigation was thus less significant in comparison to that of Montana and Minnesota. *Id.*

The Court concluded that the connection between the plaintiffs’ claims and Ford’s activities in Montana and Minnesota was sufficient to support specific jurisdiction. *Id.* at 1032. The judgments of the Montana and Minnesota Supreme Courts were thus affirmed. *Id.*

### A QUESTION OF COPYRIGHT INFRINGEMENT



**Stuart Goldstein** oversees all of **Ricci Tyrrell Johnson & Grey’s** patent, trademark and copyright application prosecution and litigation.

A copyright is a work fixed in a tangible medium of expression which is sufficiently permanent to permit it to be perceived, reproduced, or otherwise communicated. Copyrights can consist of sounds, images, or both. They run the gamut of artistic creations from books to videos to sculptures to photographs to most types of artwork. Even artistic designs on consumer product packaging are subject to copyright protection and, if the designs are formally registered with the United States Copyright Office, a cause of action for copyright infringement can be brought if there is an unauthorized copying of the product packaging design. But how much of such a copyrighted design need be copied to constitute an infringement of the copyright? In other words, what is the extent of the change which is required to avoid

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an infringement of a copyrighted product packaging design?

There is no bright line which dictates how much of a change would avoid copyright infringement. The legal standard, subjective as it might be, is whether the artwork, for instance on the packaging of a competitor, i.e. the potential infringer, is "substantially similar" to the copyrighted packaging artwork. The differences and similarities between the packaging artwork must be considered. If a reasonable person would conclude that the artwork on the two packages is similar and would likely confuse one for the other, there would likely be an infringement situation.

In this regard, consider the packaging artwork, symbols, and language of the two cardstock packages below. The design and layout of the packaging artwork on the left, Sample 1, has a registered United States copyright. The design and layout of the packaging artwork on the right, Sample 2, does not.



It is clear that the packaging artwork of both samples have Christmas themed designs, Sample 1 displaying Christmas stockings and a Christmas scene in a snow globe, and Sample 2 having Christmas trees, ornaments, a snowman, and snowflakes. Both of the scenes are located on white backgrounds which take up just over one-half of the length of the package. A "Paper Weight Guide" is located on the lower left of each of the Samples' white backgrounds and the words "Christmas" and "Christmas Edition" are located in the upper right of these white backgrounds. The colors green, red, and white are utilized in the design and generally throughout in both Samples.

Sample 1 identifies "Holiday Cardstock" and states that it is "Perfect for posters, invitations, school and craft projects" in white over a green background section. Sample 2 identifies "HOLIDAY CARDSTOCK" which is "PERFECT FOR INVITATIONS, POSTERS, ARTS & CRAFTS" in white over a red background section. Beneath these sections in both Samples is a white strip extending the width of the packaging design which indicates the dimensions, weight, and number of cardstocks in the package. Each Sample also has a bottom section, Sample 1 in green and Sample 2 in red. Both of these sections have a green circle, a red circle, and a white circle in the lower left corner and an American flag and barcode on the lower right corner.

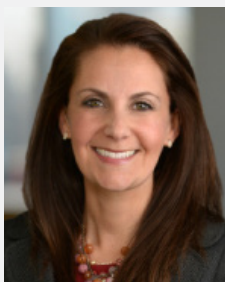
Please study the two Samples closely, considering the differences and similarities. Based on the criteria discussed above, is this a case of copyright infringement? What do you think?

Email [sgoldstein@rtjglaw.com](mailto:sgoldstein@rtjglaw.com) to give me your opinion and, if you are so inclined, the reason for that opinion. The results of your input will be printed in a future edition of our Firm's newsletter.



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### IN THE COMMUNITY: (SEPTEMBER 2021 NEWSLETTER)



"In the Community" is edited by **Ricci Tyrrell Member Tracie Bock Medeiros.**

On August 21, 2021, **Team RTJG** participated in the 2021 **Eagles Autism Challenge (EAC)**. EAC is dedicated to raising funds for innovative research and programs to help unlock the mystery of autism. EAC is an event consisting of participant bike rides, runs or walks, each beginning and ending at **Lincoln Financial Field**.



Ricci Tyrrell was a proud sponsor of the 2021 Corporate Leadership Award (CLA) dinner presented by the **International Institute for Conflict Prevention and Resolution**. The 2021 dinner honored **CVS Health** and **Thomas Moriarty**, executive VP, Chief Policy and External Affairs Officer and General Counsel. The 2021 dinner was attended by RTJG Managing Member **John Tyrrell** with his wife **Kathleen**, and founding Member **Fran Grey** and his wife **Patti**.

On August 26, 2021, RTJG Administrative Assistant **Lisa Tiffany** and other members of the **Springfield Lions Club** volunteered at the annual **Vision Bowl** held at **Sproul Lanes**, a fundraising event for **Center for the Blind and Visually Impaired**. Volunteers assisted blind bowlers with their dinner, when bowling and participating in a raffle. RTJG sponsored a lane for the event. The **Springfield Lions Club** is a group of men & women in the Springfield community who volunteer their time for humanitarian causes in Springfield, PA, regional and world-wide communities.



On September 14, 2021, RTJG Associate **Kelly Woy** and RTJG Billing Manager **Patti Grey** participated in **The Perlman Cup**,

a golf outing for women to benefit **Special Olympics New Jersey** which was held at **Forsgate Country Club**. RTJG sponsored a hole for the event. 34 foursomes competed and team RTJG took second place (up from third place last year) with a score of 8 under par!

RTJG Member **Jason Avellino** and his wife Samantha represented the firm at the annual **Boys & Girls Clubs of Philadelphia** fundraising event, the **Coach's Private Reserve Dinner** at **The Union League of Philadelphia**. Boys & Girls Clubs of Philadelphia's mission is to "enable all young people, especially those who need us the most, to reach their full potential as productive, caring, responsible citizens." Ricci Tyrrell has been a supporter of the Boys & Girls Clubs of Philadelphia for several years.

