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OFFICE OF THE
PROTHONOTARY
CHESTER CO., PA.

2023 OCT 19 PM 2:19

FILED

DOREEN WOODWARD, Individually and :
as Administrator of the ESTATE OF :
JOHN DAVID WOODWARD, Jr :
Deceased, and as Parent and Natural :
Guardian of E W , a minor :
[REDACTED] :
vs. :

IN THE COURT OF COMMON PLEAS
CHESTER COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW
NO. 2023-08132-TT

CHRISTOPHER BASHORE, Individually. :
and in his capacity as :
West Goshen Township Manager :
1025 Paoli Pike :
West Chester, PA 19380 :

JURY TRIAL DEMANDED
(CONSISTING OF 12 MEMBERS)

And :

WEST GOSHEN TOWNSHIP and, :
WEST GOSHEN TOWNSHIP BOARD :
OF SUPERVISORS :
1025 Paoli Pike :
West Chester, PA 19380 :

COMPLAINT

1 Plaintiff, Doreen Woodward, is an adult individual, and surviving spouse, residing at [REDACTED], Chester County, Pennsylvania 19348.

2 On October 12, 2023, Doreen Woodward filed for Letters of Administration with the Chester County Register of Wills to be appointed Administrator of the Estate of John David Woodward, Jr

3. The decedent, John David Woodward, Jr , was fifty-three years old at the time of his death on, or about, July 28, 2023 (*"when his body was found"*)

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CV#081524717
Dkt: COMPLETE



4. Plaintiff, Doreen Woodward, is the parent and natural guardian of minor plaintiff, E W

5 Plaintiff, Doreen Woodward, is the spouse of Decedent.

6 The decedent, John David Woodward, Jr., is the father of minor plaintiff, E W

7 Minor plaintiff, E.W., was 17 years old at the time of her father's death.

8. Defendant, Christopher Bashore, (hereinafter "Bashore") is an adult individual and employed by West Goshen Township and appointed township manager on January 3, 2022

9 Defendant, West Goshen Township, and West Goshen Board of Supervisors (hereinafter "Township") is a Second-Class Township with the administrative offices located at 1025 Paoli Pike, West Chester, Pennsylvania 19380

10 John David Woodward, Jr. (hereinafter "Decedent") was employed by West Goshen Township as Director of Public Works. The Decedent also was responsible for the fleet of township public works vehicles and the township facilities.

11. Under the auspices of "Public Works" are the Roads Department, Sewer Department and Parks Department.

12. Dorine McClune is superintendent of the Parks Department, having served West Goshen Township for over 33 years.

13 Mark Bertolami is superintendent of the Roads Department, having served West Goshen Township for over 28 years.

14 Michael Moffa is superintendent of the Sewer Department, having served West Goshen Township for over 28 years.

15 Decedent worked for West Goshen Township for over 22 years, working his way up to Director of Public Works.

16. There are approximately thirty employees of the public works department.

17. On Thursday, July 20, 2023, at 3:00 p.m. Bashore emailed Decedent, McClune, Bertolami and Moffa instructing them not to leave at the end of the workday and that he wanted a meeting with the four individuals before they go home

18. At or about 4 15 p.m the meeting convened. Bashore told the four superintendents that they were being placed on immediate unpaid administrative leave, at the same time handing each individual written notice of said administrative leave.

19 The subject of the meeting regarded “snow time” or “squirrel time” for the public works employees

20 Bashore questioned the four superintendents about township employees receiving “snow time” or “squirrel time”

21. For over approximately 10 years the unwritten policy was that each public works employee who had to work while the township offices were closed would receive an hour of credit for each hour they worked while the township offices were closed due to inclement weather Example, if an employee worked four hours plowing snow while the township offices were closed, they would get four hours credit time off to use at a later date.

22 This credited time off from work that the employees benefited from was called “snow time” or “squirrel time”

23. The four superintendents would track the credit hours accumulated by the employee(s) and would give the employee(s) time off at a later date when requested.

24 The four superintendents told Bayshore that the policy of giving employee’s “snow time” or “squirrel time” was a policy and procedure initiated by the prior township manager, Casey LaLonde, and a prior member of the board of supervisors, Raymond Halvorsen

25 Mr. Raymond Halvorsen is now deceased

26 The four superintendents told Bashore that the purpose of the “snow time” or “squirrel time” was designed to fairly compensate the public works employees who were required to work, plow snow, when the administrative offices were closed by the township manager due to inclement weather.

27. All administrative employees of the township were paid for a full eight hours even if the township closed four hours early due to inclement weather.

28 All administrative employees were paid for eight hours of work even though the township administrative offices were closed for a full day due to inclement weather.

29 Suddenly, and without provocation, Bashore started screaming at the four superintendents that the policy of giving employees “snow time” or “squirrel time” despite the employees not actually working was a theft and that “*people go to jail for these things*” “*It’s payroll fraud and all previous state audits are now fraud*”. Bashore shouted this many times, basically threatening the superintendents with going to jail

30 Bashore told the four superintendents that a former Kennett Township Manager Lisa Moore went to jail for stealing from Kennett Township for the same conduct the four superintendents were now being accused of.

31 Prior to ANY investigation by Bashore or West Goshen Township Board of Supervisors, Bashore at the July 20, 2023, meeting handed each superintendent a letter advising them that they were immediately placed on unpaid administrative leave

32. Bashore and the Board of Supervisors levied sanctions against the four superintendents prior to ANY investigation and prior to the completion of the investigation

33 Bashore told the four superintendents, orally and in writing, that they are not allowed to speak with one another during the investigation

34. Bashore told the four superintendents that they must remain available during normal township business hours to answer any questions for the investigation.

35. West Goshen Township Board of Supervisors hired a law firm to conduct their investigation, led by Scott E Blissman, Esquire.

36. During the week of July 24, 2023, each of the four superintendents were called into the township building to be interviewed by the attorneys conducting the investigation

37. The four superintendents were not compensated for their time to come in for the interviews.

38. The four superintendents were told that the investigation would take one week.

39. As of Friday, July 28, 2023, the four superintendents had not heard from Bashore or the Board of Supervisors of the status of the investigation.

40. All four superintendents were under the belief that they would be terminated from West Goshen Township for conduct that was initiated by a previous township manager

41. All four superintendents believed they were just “*waiting around to be fired*”

42. All four superintendents endured emotional distress from July 20, 2023, to present.

43. On September 7, 2023, Bashore and the Board of Supervisors called each superintendent into the township office and handed them a letter which contained the results of the investigation.

44. In the September 7, 2023, letter, Bashore states

As you know, West Goshen Township completed an investigation into the use of accumulated, but unauthorized paid time-off, referred to as “snow time” or “squirrel time” This investigation revealed your participation in the awarding and/or accumulating of such time, which was not authorized by the Board of Supervisors, either past or present

45. Bashore and the West Goshen Township Board of Supervisors were made well aware by the four superintendents that the former township manager, Casey LaLonde, and a former member of the

Board of Supervisors, Raymond Halvorsen, were the ones who put the “snow time” or “squirrel time” policy in place

46. In fact, Raymond Halvorsen was a prior superintendent of the public works department while still an active member of the Board of Supervisors of West Goshen Township.

47. Bashore and the West Goshen Township Board of Supervisors were made aware that other departments within the township were also previously using “snow time” to fairly compensate civilian employees who had to work during the time periods when township administration employees were sent home with full pay when the township would close for inclement weather.

48. Of the thirty or so employees who received the benefit of “snow time” they were never asked to pay any money back to the township, nor were any of them sanctioned for receiving “snow time”.

49. On July 28, 2023, the body of John David Woodward, Jr. was found at his residence.

50. John David Woodward, Jr , died by suicide

51 John David Woodward, Jr , left a suicide note which stated in part *“I can’t take anymore of this waiting around to be fired from a job that was my life”*

52 On the evening July 30, 2023, the chairman of the Board of Supervisors, Shaun Walsh, called the three surviving superintendents to inform them of the death of John David Woodward, Jr., and instructed each superintendent to return to work the next morning, July 31, 2023.

53 Between July 31, 2023, and September 7, 2023, the three superintendents were not given any additional information relating to the “investigation”.

Count 1 -- Negligent Infliction of Emotional Distress
Doreen Woodward, Individually, and as Administrator of the Estate,
and as parent and natural guardian of E.W., a minor
vs. Christopher Bashore, Individually

54. Plaintiffs incorporate herein by reference all preceding paragraphs as though the same were more fully set forth at length herein.

55. On July 20, 2023. Bashore intentionally, willfully, and outrageously threatened the Decedent with going to jail for his actions as public works director

56. The conduct of Bashore was negligent, reckless, willful, wanton and/or intentional in that Bashore knew his actions would cause severe emotional distress to the Decedent.

57. As a direct and legal result of the aforementioned acts committed by Bashore, the Decedent took his own life

58. As a direct and proximate result of Bashore's action, plaintiff Doreen Woodward, the Decedent John David Woodward, Jr , and minor plaintiff, E.W.'s sensory and contemporaneous observations causing the death of their husband and father, Plaintiffs experienced severe emotional distress and extreme mental pain and suffering

59. Bashore knew, or should have known, that his actions caused emotional distress to the Decedent, leading Decedent to take his own life

60. The aforementioned conduct of Bashore caused damages to the Decedent, his Estate, his wife and daughter

WHEREFORE, Plaintiff, Doreen Woodward, individually and as Administrator of the Estate of John David Woodward, Jr., and as parent and natural guardian of E W., a minor, demands judgment

against defendant, Bashore, in an amount which exceeds the mandatory arbitration limit of the Court of Common Pleas of Chester County, plus damages for delay and costs.

Count II – Negligent Infliction of Emotional Distress
Doreen Woodward, Individually, and as Administrator of the Estate,
and as parent and natural guardian of E.W., a minor
vs. West Goshen Township Board of Supervisors and
Christopher Bayshore in his role as West Goshen Township Manager.

61 Plaintiffs incorporate herein by reference all preceding paragraphs as though the same were fully set forth at length herein.

62. On or before July 20, 2023, the West Goshen Township Board of Supervisors authorized Christopher Bashore, in his role as township manager, to place the four superintendents on unpaid administrative leave **PRIOR to ANY** investigation into the “snow time” or “squirrel time”.

63. The intentional act by West Goshen Township, the West Goshen Township Board of Supervisors authorizing Bashore to suddenly place the four superintendents on unpaid administrative leave **PRIOR to ANY** investigation knew, or should have known, that placing the four superintendents, who had a **combined 110 years of service to West Goshen Township**, would cause extreme emotional distress to the Decedent and his family

64. The conduct of the West Goshen Township Board of Supervisors was negligent, reckless, willful, wanton and/or intentional in that the Board of Supervisors knew, or should have known, their actions would cause extreme emotional distress to the Decedent and his family.

65. As a direct and legal result of the aforementioned acts committed by the Board of Supervisors and Bashore, the Decedent took his own life.

66 As a direct and proximate result of the actions of West Goshen Township, the West Goshen Board of Supervisors and Christopher Bashore, the plaintiff Doreen Woodward, Decedent John

David Woodward, Jr., and minor plaintiff, E.W.'s sensory and contemporaneous observations causing the death of their husband and father, Plaintiffs experienced severe emotional distress and extreme mental pain and suffering due to the severe emotional distress and extreme pain and mental suffering

67 The Board of Supervisors and Bashore knew that their actions caused emotional distress to the Decedent, leading Decedent to take his own life

68. The aforementioned conduct of the Board of Supervisors and Bashore caused damages to the Decedent, his Estate, his wife and daughter.

WHEREFORE, Plaintiff, Doreen Woodward, Individually and as Administrator of the Estate of John David Woodward, Jr., and as parent and natural guardian of E.W., a minor, demands judgment against the Defendant's in an amount which exceeds the mandatory arbitration limit of the Court of Common Pleas of Chester County, plus damages for delay and costs.

Count III – Intentional Infliction of Emotional Distress
Doreen Woodward, Individually, and as Administrator of the Estate,
and as parent and natural guardian of E.W., a minor
vs. Christopher Bashore, Individually

69. Plaintiffs incorporate herein by reference all preceding paragraphs as though the same were fully set forth at length herein.

70. The above referenced actions of Defendant Bashore were extreme, outrageous, intentional, and reckless.

71. The above referenced actions of Bashore caused the Decedent severe emotional distress, humiliation, and embarrassment.

72 Because of said conduct by Bashore, the Plaintiff, and as Administrator of the Estate and as parent and natural guardian of E W., are entitled to punitive damages

WHEREFORE, Plaintiff, Doreen Woodward, Individually and as Administrator of the Estate of John David Woodward, Jr., and as parent and natural guardian of E.W., a minor, demands judgment against Christopher Bashore in an amount that exceeds mandatory arbitration limit of the Court of Common Pleas, plus damages for delay and costs, and punitive damages.

Count IV – Intentional Infliction of Emotional Distress
Doreen Woodward, Individually, and as Administrator of the Estate,
and as parent and natural guardian of E.W., a minor
vs. West Goshen Township and the Board of Supervisors,
and Christopher Bashore as Township Manager

73. Plaintiffs incorporate herein by reference all preceding paragraphs as though the same were fully set forth at length herein.

74. The actions of Defendant's West Goshen Township and the Board of Supervisors, and township manager Christopher Bashore were extreme, outrageous, intentional, and reckless.

75. The above referenced actions of West Goshen Township and the Board of Supervisors and township manager, Christopher Bashore, caused the Decedent intentionally caused severe emotional distress, humiliation, and embarrassment

76. Because of said conduct by West Goshen Township and the Board of Supervisors, and township manager Christopher Bashore, the Plaintiff, and as Administrator of the Estate and as parent and natural guardian of E W., are entitled to punitive damages.

WHEREFORE, Plaintiff, Doreen Woodward, Individually and as Administrator of the Estate of John David Woodward, Jr., and as parent and natural guardian of E.W., a minor, demands judgment against West Goshen Township and the Board of Supervisors along with Christopher Bashore in an

amount that exceeds mandatory arbitration limit of the Court of Common Pleas, plus damages for delay and costs, and punitive damages.

MILLER LAW OFFICES

A handwritten signature in black ink, appearing to read 'F. C. Miller', is written over a horizontal line. The signature is stylized and cursive.

FRANCIS C. MILLER, ESQUIRE
Attorney for Plaintiff

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CHRISTOPHER BASHORE, Individually,
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West Goshen Township Manager
1025 Paoli Pike
West Chester, PA 19380

JURY TRIAL DEMANDED
(CONSISTING OF 12 MEMBERS)

And

WEST GOSHEN TOWNSHIP and,
WEST GOSHEN TOWNSHIP BOARD :
OF SUPERVISORS :
1025 Paoli Pike :
West Chester, PA 19380 :

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 OFFICE SET FORTH BELOW

LAWYER REFERRAL SERVICE
Chester County Bar Association
15 West Gay Street
West Chester, PA 19380
(610) 429-1500

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AND/OR AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A
REDUCED FEE OR NO FEE