

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION**

No. 600NP of 2025

IN RE: GRAND BOULE OF SIGMA PI, NON PROFIT CORPORATION

PETITIONER'S REPLY TO RESPONDENT'S NEW MATTER

1. Admitted in part. Denied in part. It is admitted that there was an investigation. Because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.
2. Denied. It is denied that Petitioner violated the the Grand Boulé's governance documents, policies, and his fiduciary responsibilities to the Fraternity. Moreover, because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.
3. Denied as stated. Petitioner was not given timely reasonable notice and therefore said allegations are denied. Moreover, because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.
4. Denied. It is denied that the actions taken by the Grand Boulé were supported and all actions taken by the Board were unjustified, violated Petitioner's due process rights, and violated the Fraternity's Constitution and Bylaws.

5. Denied. Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

6. Denied. Each statement set forth herein is denied as untrue and contrary to the law of the case.

7. Denied. Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

8. Denied. Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

9. Admitted in part. Denied in part. The vote taken on April 9, 2025, concerning Petitioner's removal resulted in eight (8) affirmative votes for removal. The Bylaw section required at least 10 affirmative votes and therefore the vote to remove is null and void. Moreover, said allegations are contrary to the law of the case.

10. Denied. As Petitioner was never informed of the alleged meeting, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

11. Denied. As Petitioner was never informed of the alleged meeting, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

12. Denied. As Petitioner was never informed of the alleged meeting, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

13. Denied. All allegations contained in this paragraph are denied.
14. Denied. Moreover, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.
15. Denied. All allegations contained in this paragraph are denied.
16. Denied. All allegations contained in this paragraph are denied.
17. Denied. All allegations contained in this paragraph are denied.
18. Denied. All allegations contained in this paragraph are denied.
19. Denied. All allegations contained in this paragraph are denied.
20. Denied. All allegations contained in this paragraph are denied.
21. Denied as stated.
22. Denied as stated.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE (Justification and For Cause Removal)

23. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.
24. Denied. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite

number of votes as dictated by the applicable Bylaw. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

25. Denied as stated. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Moreover, because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

26. Denied. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Moreover, because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

27. Denied. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Moreover, because the investigation and scope of the investigations was concealed from Petitioner, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

28. Denied. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

29. Denied. All allegations contained in this paragraph are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

30. Denied. These allegations are denied. Moreover, justification is an improper legal defense because the removal was procedurally defective as it lacked the requisite number of votes as dictated by the applicable Bylaw. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

SECOND AFFIRMATIVE DEFENSE

(Compliance with Governing Documents, Lawful Interpretation, and Judicial Deference)

31. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

32. Denied. These allegations are denied. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the Grand Board exceeded its authority.

33. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this

paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

34. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

35. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

36. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

37. Denied. The allegations are denied. The Bylaw section required at least 10 affirmative votes and therefore the vote to remove is null and void. Moreover, said allegations are contrary to the law of the case.

38. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

39. Denied. Each and every allegation is denied. Further, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

40. Denied. Each and every allegation is denied. Further, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

THIRD AFFIRMATIVE DEFENSE (Ratification)

41. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

42. Denied. Each and every allegation is denied. Further, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

43. Denied. Each and every allegation is denied. Further, the Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

44. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this

paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the Board exceeded its authority. The ratification, as found by the Court, was unlawful.

45. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful.

46. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

47. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

FOURTH AFFIRMATIVE DEFENSE (Unclean Hands)

48. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

49. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

50. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

51. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

52. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board

exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

53. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

54. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority. The removal and ratification, as found by the Court, was unlawful. Thus, the defense of unclean hands is improper.

FIFTH AFFIRMATIVE DEFENSE
(Due Process Afforded and Waiver)

55. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

56. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

57. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

58. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

59. Denied. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

60. Denied. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

**SIXTH AFFIRMATIVE DEFENSE
(Estoppel and Lack of Retaliation)**

61. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

62. Denied. The Respondents' actions were retaliatory, including, but not limited to, filing a suit in Georgia and suspending Petitioner in violation of the Fraternity's Constitution and

Bylaws. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

63. Denied. The Respondents' actions were retaliatory, including, but not limited to, filing a suit in Georgia and suspending Petitioner in violation of the Fraternity's Constitution and Bylaws. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

64. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

65. Denied. These allegations are all specifically denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

66. Denied. The actions taken by the Respondent were unlawful and unjustified. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

67. Denied. The actions taken by the Respondent were unlawful and unjustified. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

SEVENTH AFFIRMATIVE DEFENSE

(Truth)

68. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

69. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, all members the Board exceeded its authority.

70. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

71. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

EIGHTH AFFIRMATIVE DEFENSE

(Estoppel as to Defamation Claim Arising from Petitioner's Prior Public Disclosure)

72. Petitioner incorporates by reference its responses to the preceding paragraphs as if fully set forth at length.

73. Denied. These allegations are a mischaracterization of the pleadings and the evidence that was obtained at the hearing; therefore, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

74. Denied. The Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

75. Denied. These allegations are a mischaracterization of the events, and therefore, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

76. Denied. These allegations are a mischaracterization of the events, and therefore, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

77. Denied. The Petitioner is without is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis.

Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure. By way of further answer, the removal and ratification, as found by the Court, was unlawful.

78. Denied. These allegations are a mischaracterization of the events, and therefore, Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

79. Denied. This paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

80. Denied. Petitioner is without sufficient knowledge or information to determine the veracity of the averments in this paragraph, and they are denied on that basis. Further, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

81. Denied. By way of further answer, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

82. Denied. By way of further answer, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

83. Denied. By way of further answer, this paragraph contains conclusions of law to which no response is required under the Rules of Civil Procedure.

WHEREFORE, Petitioner demands judgment against Defendant in an as yet unliquidated sum in excess of \$100,000, and such other relief, including attorney's fees and costs.

Date: February 5, 2026

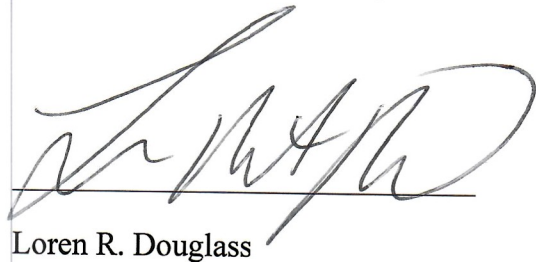


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VERIFICATION

I, Loren R. Douglass verify that facts contained in this Pleading are true and correct to the best of my knowledge, information, and belief. I understand that the statements made therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: February 5, 2026

A handwritten signature in black ink, appearing to read 'Loren R. Douglass', is written over a horizontal line. The signature is stylized with a large initial 'L' and a prominent 'D'.

Loren R. Douglass