FILED

09 MAY 2025 01:17 pm Civil Administration

M. RIVERA

Jauregui Law Firm Raul Jauregui, Esq., and Daniel Boye,	: FIRST JUDICIAL DISTRICT : Court of Common Pleas for : Philadelphia County
Plainti	: : June TERM, 2024
VS.	:
Inside Higher Education Johanna Alonso,	: NO. 240500990 :
Dyller Solomon Law Firm, and Barry Dyller, Esq Defend	: Jury Demanded : dants : :
	<u>ORDER</u>
AND NOW, this	day of, 2025 upon consideration of
the plaintiffs' motion for reconsid	eration and any response to the same, it is hereby
ORDERED and DECREED that:	
1. The Order of April 11, 2025	as clarified on May 6, 2025 is reversed.
	BY THE COURT:
	The Hon. Lyris Younge

Jauregui Law Firm

BY: RAUL JAUREGUI, ESQUIRE ATTORNEY I.D. NO. 92366 720 Arch Street PO Box 861 Philadelphia, PA 19105 (215) 559-9285, RJ@RaulJauregui.com

Attorney for Plaintiffs, and plaintiff in pro se.

Jauregui Law Firm Raul Jauregui, Esq., and Daniel Boye,

FIRST JUDICIAL DISTRICT **Court of Common Pleas for Philadelphia County**

Plaintiffs

June TERM, 2024

VS.

NO. 240500990

Inside Higher Education Johanna Alonso,

Dvller Solomon Law Firm, and Barry Dyller, Esq

Jury Demanded

Defendants

Plaintiffs' Motion for Reconsideration

All plaintiffs respectfully move Judge Lyris Younge of this Honorable Court to reconsider her decision of April 11, 2025 as clarified on May 6, 2025 and to reverse the same. (These orders are **Exhibit A**). Judge Younge has inherent power to reverse this decision and the ability to grant reconsideration is up to Judge Younge only. In Pennsylvania, a proper motion for reconsideration "is addressed to the sound discretion of the trial court[.]" Moore v. Moore, 634 A.2d 163, 166 (Pa. 1993). In support whereof all the plaintiffs aver as follows:

The Plaintiffs seek reversal of the May 6, 2025 order because it sends the wrong 1. message to the Philadelphia public. That wrong message is that they cannot come to this Honorable Court to clear their names when large and nameless corporations like the IHE defendants destroy any member of the public's reputation online. The

Pennsylvania legislature has guaranteed that right for all of the Philadelphia public. See, e.g., 42 Pa. C.S. §§ 8341-8345.

- 2. The other wrong message is that people of color (all the plaintiffs are Latino) do not have a chance to get their day in this Honorable Court.
- 3. Unless Judge Younge grants this reconsideration the plaintiffs will incur great expense and delay in obtaining justice. That delay and expense includes:
 - A. Paying and filing an appeal to the Superior Court.
 - B. Paying and filing for a second trial against only the IHE defendants in the event that the Superior Court grants the plaintiffs' appeal.
 - C. Trying their case against co-defendants Dyller Solomon, LLC and Barry Dyller, Esq., without the benefit of having the IHE defendants participation as defendants.
 - D. Continuing to suffer from the IHE defendants' horrid defamation of the plaintiffs' names which remains on line to this day in the IHE defendants' web platform which they claim receives 2.2 million visitors per month.
- 4. Likewise, unless Judge Younge grants this reconsideration, the court itself will face significant tasks that will unnecessarily increase its workload, including:
 - A. Write a first opinion justifying the dismissal of the IHE plaintiffs addressing the complex topic of why the IHE defendants did not abuse the Fair Report Privilege which is what the Complaint alleges they did.
 - B. Direct the plaintiffs to file a concise statement of matters complained on appeal pursuant to PaRAP 1925.
 - C. Write a second opinion responding to the PaRAP 1925 statement.

- D. Write a third opinion certifying the plaintiffs' May 7, 2025 motion for interlocutory appeal.
- 5. Reconsideration is proper because it is likely that this situation resulted because of clerical error:
 - A. During the May 2, 2025 status conference for this case with Judge Cohen he personally reviewed Judge Younge's Order of April 11, 2025.
 - B. Judge Cohen then stated that it appeared to Judge Cohen and to his chambers' staff that Judge Younge had denied the IHE defendants motion to be dismissed from this case.
 - C. This made sense because on the April 11, 2025 order Judge Younge hand wrote "denied" which seemed to refer to the IHE defendants' order seeking their dismissal as defendants.
 - D. Simply put, because the April 11, 2025 docketed order says "denied" in what appears to be Judge Younge's own handwriting, that order read as saying that the IHE defendants motion had been "denied".
 - E. The April 11, 2025 Order has no accompanying memorandum opinion as would be the case had Judge Younge actually dismissed the IHE defendants.
 - F. Thus, it may be that there was an original clerical mistake from the Office of Judicial Records who described the April 11, 2025 order on the docket as if Judge Younge had granted it.
 - G. And this mistake may explain why Judge Younge later clarified her April 11, 2025 order in a second order docketed May 6, 2025 this time clearly granting the IHE defendants' dismissal.

6. Reconsideration is proper because it is manifestly unjust to let the IHE defendants get out of this litigation, so that they can harm other members of the public, just as they have harmed the plaintiffs.

7. If Judge Younge has the grace to grant this reconsideration the IHE defendants have plenty of opportunity to show in their summary judgment motion that they did not destroy the plainiffs' reputation in complete violation of the Fair Report Privilege.

WHEREFORE all plaintiffs respectfully request that Judge Younge restore their right to have their day in Court in order to clear their name from the horrid lies that the IHE defendants continue to publish online against the plaintiffs.

Respectfully submitted,

Janey un

Raul Jauregui

May 9, 2025.

Jauregui Law Firm

BY: RAUL JAUREGUI, ESQUIRE ATTORNEY I.D. NO. 92366 720 Arch Street PO Box 861 Philadelphia, PA 19105 (215) 559-9285, RJ@RaulJauregui.com

Attorney for Plaintiffs, and plaintiff in pro se.

Jauregui Law Firm : Raul Jauregui, Esq., and : Daniel Boye, :

FIRST JUDICIAL DISTRICT Court of Common Pleas for Philadelphia County

Plaintiffs VS.

June TERM, 2024

Inside Higher Education

NO. 240500990

Johanna Alonso, Dyller Solomon Law Firm, and

Dyller Solomon Law Firm, and Barry Dyller, Esq

D C 1

Jury Demanded

Defendants :

Certificate of Compliance

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania, Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Certificate of Service

I certify that I served this response on the defendants via this Court's electronic filing presented to the Office of Judicial Records on May 9, 2025.

Respectfully submitted,

Raul Jauregui

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EXHIBIT A

FILED

05 MAY 2025 10:32 am Civil Administration

T. BARRETT

JAUREGUI LAW FIRM, RAUL JAUREGUI, ESQ., and DANIEL BOYE,

Plaintiffs,

v.

INSIDE HIGHER ED, JOHANNA ALONSO, DYLLER SOLOMON LAW FIRM and BARRY DYLLER, ESQ.,

Defendants.

PHILADELPHIA COUNTY COURT OF COMMON PLEAS

CIVIL DIVISION NO. 240500990

ORD!

AND NOW, this 6 day of

, 2024, upon consideration of the

Motion for Clarification and Reconsideration filed by Defendants Inside Higher Ed and Johanna Alonso, and any response thereto, it is hereby ordered that the Motion is GRANTED and JUDGMENT IS ENTERED in favor of Defendants Inside Higher Ed and Johanna Alonso and against Plaintiffs.

SO ORDERED:

ORDER-Jauregui Law Firm Etal Vs Inside Higher Education [CMF]

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Carpol #2505/035

Case ID: 240500990

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01 OCT 2024 04:21 pm

Civil Administration

A. MALONIS

JAUREGUI LAW FIRM, RAUL JAUREGUI, ESQ., and DANIEL BOYE,

v.

Æ,

PHILADELPHIA COUNTY COURT OF COMMON PLEAS

Plaintiffs,

CIVIL DIVISION NO. 240500990

INSIDE HIGHER ED, JOHANNA ALONSO, DYLLER SOLOMON LAW FIRM and BARRY DYLLER, ESQ.,

Defendants.

ORDER

AND NOW, this 24 day of

, 2024, upon consideration of the

Motion for Judgment on the Pleadings filed by Defendants Inside Higher Ed and Johanna Alonso, and any response thereto, it is hereby ordered that the Motion is GRANTED and JUDGMENT IS ENTERED in favor of Defendants Inside Higher Ed and Johanna Alonso and against Plaintiffs.

Denied.

SO ORDERED:

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[APR 1.1 2025

N. ERICKSON
AJOR JURY

ORDER-Jauregui Law Firm Etal Vs Inside Higher Education [FJB]

