

IN THE SUPERIOR COURT OF PENNSYLVANIA

IN RE:

Pa Super Docket No. 1875 EDA 2009

APPEAL OF D.Y.

RELATED AND CONSOLIDATED

Appeal from the Order entered June 15, 2009  
Court of Common Pleas, Philadelphia County  
Family Division at No. 0906V7858

Pa Super Docket 2697 EDA 2009

Pa Super Docket 2699 EDA 2009

APPELLANT’S MOTION FOR SUMMARY JUDGMENT DUE TO  
APPELLEE IS NON RESPONSIVE AND NON COMPLIANT  
AND  
APPELLANT’S ALTERNATIVE MOTION FOR CONSOLIDATION OF  
PA SUPER 1875 EDA 2009 WITH RELATED PA SUPER 2697 and 2699 EDA 2009

[PROPOSED] O R D E R

AND NOW on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_, Appellant’s Motion for Summary Judgment due to Appellee’s Non Response and Non Compliance is hereby GRANTED.

\_\_\_\_\_  
J.

[PROPOSED ALTERNATIVE] ORDER

AND NOW on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_, Appellant’s Alternative Motion to Consolidate Pennsylvania Superior Court Docket 1875 EDA 2009 with related consolidated Pennsylvania Superior Court Dockets 2697 EDA 2009 and Pa 2699 EDA 2009 wherein November 25<sup>th</sup> and December 7, 2009 Orders state “Review of these matters indicates that these appeals involve related parties and issues” and “Dispositions of the motion to quash these appeals is hereby deferred to the panel that will decide the merits of these appeals” is GRANTED such that Pa Super 1875, 2697 and 2699 EDA 2009 are CONSOLIDATED and dispositions of appeals, responses, motions and answers involving related parties in all three CONSOLIDATED matters is DEFERRED TO THE PANEL THAT WILL DECIDE THE MERITS OF THESE APPEALS.

\_\_\_\_\_  
J.

IN THE SUPERIOR COURT OF PENNSYLVANIA

DEBORAH YOUNG

Appellant Pro Se

v.

VINCENT LANG

Appellee

Pa Super Docket No. 1875 EDA 2009

Related Open Dockets:

Pa Super Docket 2697 EDA 2009

Pa Super Docket 2699 EDA 2009

U.S.D.C. Pa Eastern 209cv05015-MSG

APPELLANT’S MOTION FOR SUMMARY JUDGMENT DUE TO  
APPELLEE IS NON RESPONSIVE AND NON COMPLIANT  
AND  
APPELLANT’S ALTERNATIVE MOTION FOR CONSOLIDATION OF  
PA SUPER 1875 EDA 2009 WITH RELATED PA SUPER 2697 EDA 2009 and  
RELATED PA SUPER 2699 EDA 2009

Appeal from the Order entered June 15, 2009  
Court of Common Pleas, Philadelphia County  
Family Division at No. 0906V7858, Honorable Ida K. Chen

COMES NOW, Deborah Young (“Appellant Pro Se”), with legal basis, Article I, Section 1 and Section 20, Constitution of the Commonwealth of Pennsylvania<sup>1</sup> and undisputed Appellant Pro Se Brief filed November 10, 2009 with thirty-eight (38) undisputed proof exhibits and states that there is no genuine dispute as to the existence of the fact that Order entered June 15, 2009 Court of Common Pleas Philadelphia County Family Division at No. 0906V7858 of Judge Ida K. Chen should be summarily abrogated for uncontroverted facts set forth herein.

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<sup>1</sup> Constitution of the Commonwealth of Pennsylvania, Article I Declaration of Rights Section 1 Inherent Rights of Mankind. All men are born equally free and independent, and have certain inherent and inalienable rights, among which are those of enjoying and defending life and liberty, of acquiring, possessing and protecting property and reputation, and of pursuing their own happiness. Constitution of the Commonwealth of Pennsylvania Article I Declaration of Rights Section 20 Right Of Petition. The citizens have a right in a peaceable manner to assemble together for their common good, and to apply to those invested with the powers of government for redress of grievances or other proper purposes, by petition, address or remonstrance.

**MOTION FOR SUMMARY JUDGMENT DUE TO  
APPELLEE NON RESPONSIVE NON COMPLIANT**

1. On December 16, 2009, Appellee Vincent Lang has failed to comply with Pennsylvania Superior Court Clerk's Docket 1875 EDA 2009 "Next Event Type: Appellee Brief Filed, Next Event Due Date: December 4, 2009".

2. On December 16, 2009, Appellee Vincent Lang's attorney representative of record, Arnold F. Laikin, Esquire has failed to comply with Pennsylvania Superior Court Clerk's Docket 1875 EDA 2009 "Next Event Type: Appellee Brief Filed, Next Event Due Date: December 4, 2009".

3. On December 16, 2009, Appellee Vincent Lang has not filed "Application for Extension of Time to File Brief" with Pennsylvania Superior Court Clerk in Pa Super Docket 1875 EDA 2009.

4. On December 16, 2009, Appellee's attorney representative of record, Arnold F. Laikin Esquire has not filed "Application for Extension of Time to File Brief" with Pennsylvania Superior Court Clerk in Pa Super Docket 1875 EDA 2009 on behalf of Appellee Vincent Lang.

5. On December 16, 2009, no other attorney representative has filed Entry of Appearance nor Application of Time to File Brief on behalf of Appellee Vincent Lang.

6. On December 16, 2009, Vincent Lang Appeal Brief due December 4, 2009 is twelve days delinquent indicating Appellee Vincent Lang does not respect the grave and serious nature of these Pennsylvania Superior Court Appeal proceedings in 1875 EDA 2009.

7. On December 16, 2009, there is no Pennsylvania Superior Court Clerk Docket event entry into Pa Super Docket 1875 EDA 2009 which indicates Appellee intends to respond or defend the grave and serious statements with thirty-eight (38) proof exhibits made known to

Pennsylvania Superior Court in Appellant Pro Se's Deborah Young's undisputed November 10, 2009 Appeal Brief.

### STATEMENT OF UNCONTROVERTED FACTS<sup>2</sup>

8. Appellant Deborah Young is a CPS Corruption in Government Victim Pro Se Appellant who has suffered repeated denials of due process as a result of counter intuitive legal procedures which are the subject of grievances which result in Appeal from the Order entered June 15, 2009, Court of Common Pleas, Philadelphia County, Family Division at No. 0906V7858, Honorable Ida K. Chen.

9. On December 2, 2009, Appellant sought relief from the counter intuitive legal procedures which discriminate against Appellant Pro Se and intensify the suffering and victimization of Deborah Young and Deborah Young's Children and made known to Pennsylvania Superior Court in Appellant's December 2, 2009 Answer to Application to Quash Mother's Appeal in Consolidated Dockets 2697 and 2699 EDA 2009.

10. On December 2, 2009, Appellant Deborah Young filed in Pennsylvania Superior Court Consolidated Dockets 2697 and 2699, on behalf of herself and her children Cameron Detwiler and Briana Detwiler as **"Joined Appellants Pro Se"**, a Corruption in Government Victim Family Disclosure Statement as follows: "Self Presenting Appellants Pro Se are victims of corruption in government whose Constitution of the Commonwealth of Pennsylvania Inherent

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<sup>2</sup> On December 2, 2009 Appellant filed Corruption in Government Victim Disclosure Statement within the context of Deborah Young Cameron Detwiler and Briana Detwiler Appellants Pro Se Timely Answers and Protest to Carlin Tablib Saafir's Motion to Quash Mother's Appeal Egregiously Claiming Motion is on "Behalf of B.D." and Appellants Pro Se Timely Answers and Protests to City of Philadelphia Law Department Shelley R. Smith, City Solicitor by Michael Angelotti Assistant City Solicitor The Department of Human Services Motion to Join Appellee Child Advocate's Motion Quash Appeal in related already consolidated unconstitutionally 'Fast Tracked' Pa Super 2697 and 2699 EDA 2009. Pennsylvania Superior Court Orders November 25, 2009 and December 7, 2009 state "Review of these matters indicates that these appeals involve related parties and issues. Accordingly, the appeals at Nos. 2697 and 2699 EDA are hereby CONSOLIDATED" and "Disposition of the motions to quash these appeals is hereby deferred to the panel that will decide the merits of these appeals."

rights of Mankind have been repeatedly violated to cause the destruction of an American Family. Victim Family Appellants Pro Se herein have reasonable hope that the Wisdom and Integrity of this Court will recognize that Victim Family Appellants Pro Se were not required to know rules of procedures and cite case law when Court of Common Pleas Family Court; City of Philadelphia Department of Human Services as managed by Anne Marie Ambrose and Willful Complicit Accessory to Prolonged Child Abuse Attorney Child Advocate perpetrated repeated crimes of conspiracy, denial of due process, professional negligence, employee misconduct and civil rights violations which resulted in the kidnap for the profit, judicial negligence, aggravated assaults, prolonged child abuse, lost earnings and personal injuries being suffered by Deborah Young, Cameron Detwiler and Briana Detwiler. Therefore, Corruption in Government Victim Family Appellants Pro Se have reasonable expectation and respectful request that This Court is committed to truth finding forsaking and rejecting all attempts of Philadelphia Family Court and DHS as managed by Anne Marie Ambrose Appellee and Child Advocate Accomplice who are eager to cover up the true and accurate nature of the litigation which is Official Corruption, Fraud, Kidnap For Profit, Judicial Negligence, Willful Judicial Failure to Protect, Aggravated Assaults, Prolonged Child Abuse, Personal Injury and more. Respectfully, Deborah Young on behalf of her children Cameron Detwiler and Briana Detwiler.”

11. By way of emphasizing Uncontroverted Facts, Appellant Deborah Young restates November 4, 2009 Appeal Brief and thirty-eight (38) proof exhibits filed in and made known to Pennsylvania Superior Court on November 4, 2009, and on December 16, 2009 remain undisputed by any party in Pa Superior Court Dockets 1875, 2697 and 2699 EDA 2009.

12. Appellant Pro Se Deborah Young submits substantial proofs to Superior Court of Pennsylvania that Appealed June 15, 2009 Order of Court of Common Pleas Family Court Judge

Ida K. Chen is evidence of judicial misconduct in violation of Canon 1 of Pennsylvania Judicial Conduct Board Code of Judicial Conduct.<sup>3</sup> See Appellant Pro Se Deborah Young Summation of Proof Exhibits Index attached hereto and incorporated by reference as if fully set forth throughout Appeal from the Order June 15, 2009. All Exhibit Proofs submitted to Superior Court of Pennsylvania were also known to Court of Common Pleas Family Court Judge Ida K. Chen and Court of Common Pleas Philadelphia County Family Court Division.

13. Appellant Pro Se Deborah Young submits substantial proofs to Superior Court of Pennsylvania that Family Court of Common Pleas Philadelphia Family Court Judge Ida K. Chen's Appealed Order entered June 15, 2009 and Judge Ida K. Chen's August 21, 2009 Opinion in 1875 EDA 2009 Case No. 906V7858<sup>4</sup>; and Judge Ida K. Chen's June 29, 2007 Orders denying protection from abuse for Deborah Young, Cameron Detwiler and Briana Detwiler; and Judge Ida K. Chen's June 8, 2008 "Final Order of The Court" giving protection to Vincent Lang, are evidence of Judicial Misconduct egregious for exacerbating and prolonging Vincent Lang's aggravated assaults, stalking, terror, verbal violence, physical mental abuse upon Deborah Young and her children Cameron and Briana Detwiler.

14. Appealed June 15, 2009 Order of Family Court Judge Ida K. Chen denies protection; denies due process, fails to protect, censors and ignores evidence, and egregiously

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<sup>3</sup> Pennsylvania Judicial Conduct Board Code of Judicial Conduct. Canon 1: Judges should uphold the integrity and independence of the Judiciary. An independent and honorable judiciary is indispensable to justice in our society. Judges should participate in establishing, maintaining, and enforcing, and should themselves observe, high standards of conduct so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective. Adopted November 21, 1973, effective January 1, 1974; Amended November 21, 2005.

<sup>4</sup> "Petitioner Failed To Prove Her Case. By a Preponderance of the Evidence" and "Based upon the testimony offered, as well as the credibility determinations of the court regarding the witnesses, the trial court was not able to find that the petitioner established a case of abuse within the meaning of the law." Opinion of Judge Ida K. Chen, Deborah Young, Petitioner, v. Vincent Lang, Respondent, Stamp Filed August 21, 2009 4:13 PM. See Appellant Pro Se Deborah Young Exhibit Proof Index.

exacerbates and prolongs the physical mental abuse, assault, terror, verbal violence and threat of loss of life, inflicted by Vincent Lang, Appellee, upon Appellant Pro Se Deborah Young and her children Cameron and Briana Detwiler, which Court of Common Pleas Philadelphia County Family Court Division, as a court, has known about and failed to protect Appellant Pro Se and her children Cameron Detwiler and Briana Detwiler from 1997 to present and which Family Court Judge Ida K. Chen is complicit accessory for causing intensified and prolonged victimization of Appellant Pro Se Deborah Young and Deborah Young's children, Cameron Detwiler and Briana Detwiler.

15. Appellant Pro Se Deborah Young submits substantial proofs to Superior Court of Pennsylvania that Vincent Lang Appellee has been permitted to inflict prolonged abuse, assault, stalking, terror, verbal violence, physical mental abuse upon Deborah Young and her children, Cameron Detwiler and Briana Detwiler, which was made possible by the Court of Common Pleas Family Court's administrative negligence of the Domestic Relations matters concerning Appellant Deborah Young, her children, Cameron and Briana Detwiler, and Vincent Lang, Appellee.

16. Appellant Pro Se submits substantial proofs to Superior Court of Pennsylvania that Vincent Lang Appellee has been permitted to inflict prolonged abuse, assault, stalking, terror, verbal violence, physical mental abuse upon Deborah Young and her children, Cameron Detwiler and Briana Detwiler because Judge Ida K. Chen has unfairly denied protection from abuse for Appellant Pro Se Deborah Young and Deborah Young's children, Cameron Detwiler.

17. Appellant Pro Se provides herein substantial proofs spanning 1997 to present of Court of Common Pleas, Philadelphia Family Court Division's failure to protect Deborah Young, Cameron Detwiler and Briana Detwiler, from the repeated assaults, stalking, terror

threats, verbal violence, physical mental abuse inflicted by Vincent Lang, Appellee such that Appealed Order entered June 15, 2009 is, in fact, the result of Court of Common Pleas Philadelphia County Family Court's denial of due process, censorship of Deborah Young Appellant Pro Se evidence, and flagrant case management errors which conspicuously favor Vincent Lang, Appellant.

18. Deborah Young, Appellant Pro Se did not have ethical counsel during the Court of Common Pleas Philadelphia County Family Court proceedings which resulted in the Appealed Order of June 15, 2009, and is at a disadvantaged for citing case law within this Appeal to Superior Court of Pennsylvania brief. See Appellant Pro Se Deborah Young Summation of Proof Exhibits Index attached hereto and incorporated by reference as if fully set forth throughout Appeal from the Order June 15, 2009. All Exhibit Proofs submitted to Superior Court of Pennsylvania were also known to Court of Common Pleas Family Court Judge Ida K. Chen and Court of Common Pleas Philadelphia County Family Court Division.

19. Appellant Pro Se remains committed to these Superior Court Appeal of Order of June 15, 2009 proceedings, hopeful Superior Court of Pennsylvania could rescue Deborah Young and her children Cameron Detwiler and Briana Detwiler from the prolonged abuse, assault, stalking, terror, life threatening conducts, physical mental abuse inflicted by Vincent Lang, Appellee which Court of Common Pleas Philadelphia County Family Court Division as a court has known about and failed to protect Appellant Pro Se and her children Cameron Detwiler and Briana Detwiler from 1997 to present.

20. Deborah Young Appellant Pro Se respectfully asks Superior Court of Pennsylvania to scrutinize the voluminous proofs provided in this Appeal of Order entered June 15, 2009, which include proofs that Appellant Pro Se has been victimized by at least one

unethical attorney representative (Linda Walters, Esquire) but remains hopeful Superior Court of Pennsylvania could rescue Deborah Young and her children Cameron Detwiler and Briana Detwiler from the prolonged abuse, assault, stalking, terror, life threatening conducts, physical mental abuse inflicted by Vincent Lang, Appellee which Court of Common Pleas Philadelphia County Family Court Division as a court has known about and failed to protect Appellant Pro Se and her children Cameron Detwiler and Briana Detwiler from 1997 to present. See Commonwealth of Pennsylvania Judicial Conduct Board Pennsylvania Judicial Conduct Board completed, signed form, Confidential Request For Investigation of Philadelphia Family Court Judge Ida K. Chen, which names Linda Walters, Esquire.

21. Appellant Pro Se believes Linda Walters, Esquire acted in conflict of interest when Linda Walters instructed Deborah Young to transfer \$4,000.00 to Linda Walters' bank account without disclosing her prior friendship relationship with Vincent Lang and Vincent Lang's mother, Mary Ann Taylor, a defendant in US District Court for the Eastern District of Pennsylvania 2:09-cv-0515-MSG.

22. Deborah Young Appellant Pro See provides voluminous proof exhibits that Court of Common Pleas Family Court Judge Ida K. Chen's Appealed June 15, 2009 Order is indicative of Judicial Negligence, Judicial Misconduct, Denies Due Process, Censors Evidence and prolongs the physical mental abuse, assault, terror, verbal violence and threat of loss of life, inflicted by Vincent Lang, Appellee, upon Deborah Young, Cameron Detwiler and Briana Detwiler, which Court of Common Pleas Philadelphia County Family Court Division as a court has known about and failed to protect Appellant Pro Se and her children Cameron Detwiler and Briana Detwiler from 1997 to present, and Family Court Judge Ida K. Chen has known about and is culpable for exacerbating the prolonged child abuse, assault, stalking, terror threats, verbal

violence, physical mental abuse of Appellant Pro Se Deborah Young and her children Cameron Detwiler and Briana Detwiler 2006 through Appealed Order of June 15, 2006. See Appellant Pro Se Deborah Young Summation of Proof Exhibits Index attached hereto and incorporated by reference as if fully set forth throughout Appeal from the Order June 15, 2009. All Exhibit Proofs submitted to Superior Court of Pennsylvania were also known to Court of Common Pleas Family Court Judge Ida K. Chen and Court of Common Pleas Philadelphia County Family Court Division.

**Appellant Pro Se Deborah Young  
Summation of Proof Exhibits Index  
IN THE SUPERIOR COURT OF PENNSYLVANIA  
Appeal from the Order entered June 15, 2009  
Court of Common Pleas, Philadelphia County  
Family Division at No. 0906V7858**

1. Appellant Pro Se Exhibit 1. First Page Pennsylvania Judicial Conduct Board Confidential Request For Investigation Form.
2. Appellant Pro Se Exhibit 2. Signature Page Pennsylvania Judicial Conduct Board Confidential Request For Investigation Form.
3. Appellant Pro Se Exhibit 3. Philadelphia Police All Incidents 911 Call Log. Page 1 of 7. There are more than 70 911 calls to two different addresses, where Vincent Lang repeatedly inflicts domestic violence, assaults and life threatening conducts against Appellant Pro Se Deborah Young and her children, Cameron and Briana Detwiler.
4. Appellant Pro Se Exhibit 4. Philadelphia Police All Incidents 911 Call Log. Page 2 of 7.
5. Appellant Pro Se Exhibit 5. Philadelphia Police All Incidents 911 Call Log. Page 3 of 7.

6. Appellant Pro Se Exhibit 6. Philadelphia Police All Incidents 911 Call Log. Page 4 of 7.

7. Appellant Pro Se Exhibit 7. Philadelphia Police All Incidents 911 Call Log. Page 5 of 7. There are more than 70 911 calls to two different addresses, where Vincent Lang repeatedly inflicts domestic violence, assaults and life threatening conducts against Appellant Pro Se Deborah Young and her children, Cameron and Briana Detwiler.

8. Appellant Pro Se Exhibit 8. Philadelphia Police All Incidents 911 Call Log. Page 6 of 7.

9. Appellant Pro Se Exhibit 9. Philadelphia Police All Incidents 911 Call Log. Page 7 of 7. There are more than 70 911 calls to two different addresses, where Vincent Lang repeatedly inflicts domestic violence, assaults and life threatening conducts against Appellant Pro Se Deborah Young and her children, Cameron and Briana Detwiler.

10. Appellant Pro Se Exhibit 10. 06/26/06 Philadelphia Police Department Complaint Incident Report, Assault of Appellant Pro Se Deborah Young's eight (8) year old daughter, Briana Detwiler by Vincent Lang perpetrator of repetitive and ongoing assaults, verbal violence, terror threats and prolonged child abuse.

11. Appellant Pro Se Exhibit 11. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's son, Cameron Detwiler despite grave and serious nature of Vincent Lang's crimes against Cameron Detwiler. Petition for Relief Under the Protection Act Cameron J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

12. Appellant Pro Se Exhibit 12. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's son, Cameron Detwiler despite grave and serious nature of Vincent Lang's crimes

against Cameron Detwiler. Petition for Relief Under the Protection Act Cameron J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

13. Appellant Pro Se Exhibit 13. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's son, Cameron Detwiler despite grave and serious nature of Vincent Lang's crimes against Cameron Detwiler. Petition for Relief Under the Protection Act Cameron J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

14. Appellant Pro Se Exhibit 14. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's son, Cameron Detwiler despite grave and serious nature of Vincent Lang's crimes against Cameron Detwiler. Petition for Relief Under the Protection Act Cameron J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

15. Appellant Pro Se Exhibit 15. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant Deborah Young and her children Cameron and Briana Detwiler, Petition for Relief Under the Protection Act Deborah Young on behalf of Cameron J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

16. Appellant Pro Se Exhibit 16. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's daughter, Briana Detwiler despite grave and serious nature of Vincent Lang's crimes against Briana Detwiler. Petition for Relief Under the Protection Act Deborah Young on behalf of Briana J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

17. Appellant Pro Se Exhibit 17. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's daughter, Briana Detwiler despite grave and serious nature of Vincent Lang's crimes against Briana Detwiler. Petition for Relief Under the Protection Act Deborah Young on behalf of Briana J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

18. Appellant Pro Se Exhibit 18. 06/29/07 Judge Ida K. Chen Denies Protection for Appellant's daughter, Briana Detwiler despite grave and serious nature of Vincent Lang's crimes against Briana Detwiler. Petition for Relief Under the Protection Act Deborah Young on behalf of Briana J. Detwiler vs. Vincent Lang, Family Court Division No. 0611V7063.

19. Appellant Pro Se Exhibit 19. 02/03/07 handwritten note of Appellant's daughter, Briana Detwiler written believing Philadelphia Family Court Judge would protect child from described abuse of Vincent Lang, Appellee.

20. Appellant Pro Se Exhibit 20. Commonwealth of Pennsylvania County of Philadelphia, Detective Michael Weleski 794 Arrest Warrant No. 24283 for Vincent Lang "Violation of Protection Order. Vincent Lang Appellee criminal dockets. Multiple arrests for Terrorist Threats, Threat with Knife, Assault, Drunk Driving, Possession of Controlled Substance, Contempt of Court, Domestic Violence, Stalking, etc. and finally Vincent Lang's Municipal Court Cost Account is referred to collection agency while Victims Appellant Deborah Young and her children continue to be assaulted terrorized and abused. MC51CR811091-2006; MC51CR1252031-1999, MC51CR1226331-1995, MC51CR0431711-1995.

21. Appellant Pro Se Exhibit 21. 12/31/1999 Philadelphia Police Department Arrest Record of Vincent Lang arrested on Affidavit of Probable Cause. Vincent Lang Appellee criminal dockets. Multiple arrests for Terrorist Threats, Threat with Knife, Assault, Drunk Driving, Possession of Controlled Substance, Contempt of Court, Domestic Violence, Stalking, etc. and finally Vincent Lang's Municipal Court Cost Account is referred to collection agency while Victims Appellant Deborah Young and her children continue to be assaulted terrorized and abused. MC51CR811091-2006; MC51CR1252031-1999, MC51CR1226331-1995, MC51CR0431711-1995.

22. Appellant Pro Se Exhibit 22. 12/13/08 Clinical Care Specialist reported need to investigate Vincent Lang's abuse of Cameron and Briana Detwiler, Appellant Pro Se Deborah Young's children to DHS and CBH Health Philadelphia. Censored and ignored by Appealed Order of June 15, 2009, Family Court Judge Ida K. Chen.

23. Appellant Pro Se Exhibit 23. 03/22/07 Cameron Detwiler Clinical Formulation Report: "Client is a 9 year old boy who is intelligent and cooperative. He is anxious and occasionally has nightmares. He gets easily irritated and has a conflicted relationship with his Father whom he says he fears and wishes to avoid." Diagnosis: Adjustment Disorder with mixed anxiety and depressed mood.

24. Appellant Pro Se Exhibit 24. 03/22/07 Briana Detwiler Clinical Formulation Report: "Client is an 8 year old girl who is intelligent, open and cooperative....She states that she is bullied by her father and alleges physical and emotional abuse and wants to avoid him because she gets nervous in his company...." Diagnosis: Adjustment Disorder with mixed anxiety and depressed mood.

25. Appellant Pro Se Exhibit 25. One of four letter written by and between former counsel, alerting Philadelphia Family Court, Judge Ida K. Chen that Appellant Deborah Young's children, Cameron and Briana Detwiler are abused regularly and in great danger posed by aggravated assaults and life threatening conducts of Vincent Lang, Appellee.

26. Appellant Pro Se Exhibit 26. 07/15/08 handwritten note of Appellant's victim children. Cameron Detwiler and Briana Detwiler wrote this note to Philadelphia Family Court Judge, pleading for help "to go home" and to see their mother Appellant Deborah Young. Censored and ignored by Judge Ida K. Chen.

27. Appellant Pro Se Exhibit 27. Vincent Lang Bail Report Criminal Docket Report. Simple Assault Recklessly Endangering Another Person, 4 Criminal Arrests. Appellee Vincent Lang simply pays \$5,000.00 bail and repeats assaults against Appellant Deborah Young and her children Cameron and Briana Detwiler.

28. Appellant Pro Se Exhibit 28. Vincent Lang Appellee Criminal Docket Report, Contempt of Court, Harassment, Terroristic Threats, simply dismissed for Vincent Lang, Appellee. Vincent Lang Appellee criminal dockets. Multiple arrests for Terrorist Threats, Threat with Knife, Assault, Drunk Driving, Possession of Controlled Substance, Contempt of Court, Domestic Violence, Stalking, etc. and finally Vincent Lang's Municipal Court Cost Account is referred to collection agency while Victims Appellant Deborah Young and her children continue to be assaulted terrorized and abused. MC51CR811091-2006; MC51CR1252031-1999, MC51CR1226331-1995, MC51CR0431711-1995.

29. Appellant Pro Se Exhibit 29. Vincent Lang Appellee Criminal Docket Report. Driving Under Influence Alcohol and Controlled Substance simply fined and closed for Vincent Lang Appellee. Vincent Lang Appellee criminal dockets.

30. Appellant Pro Se Exhibit 30. 07/15/09 Philadelphia Family Court Prothonotary stamped filed CONCISE ERRORS of Appellant Deborah Young. Timeline reports repeated and intensified victimization of Deborah Young and her children by Philadelphia Family Court's failure to protect by way of denial of due process, censorship of evidence and chronic mis-administration of the domestic relations matters affecting Appellant Deborah Young and her victimized children, Cameron and Briana Detwiler. CONCISE ERRORS Page 1 of 3.

31. Appellant Pro Se Exhibit 31. 07/15/09 Philadelphia Family Court Prothonotary stamped filed CONCISE ERRORS of Appellant Deborah Young. Timeline reports repeated and

intensified victimization of Deborah Young and her children by Philadelphia Family Court's failure to protect by way of denial of due process, censorship of evidence and chronic mis-administration of the domestic relations matters affecting Appellant Deborah Young and her victimized children, Cameron and Briana Detwiler. CONCISE ERRORS Page 2 of 3.

32. Appellant Pro Se Exhibit 32. 07/15/09 Philadelphia Family Court Prothonotary stamped filed CONCISE ERRORS of Appellant Deborah Young. Timeline reports repeated and intensified victimization of Deborah Young and her children by Philadelphia Family Court's failure to protect by way of denial of due process, censorship of evidence and chronic mis-administration of the domestic relations matters affecting Appellant Deborah Young and her victimized children, Cameron and Briana Detwiler. CONCISE ERRORS Page 3 of 3.

33. Appellant Pro Se Exhibit 33. 08/11/2006 Philadelphia Police Report DC No. 6-02-052883. Other Assaults, Domestic Abuse, Simple Assaults, Domestic Abuse, Simple Assault. Philadelphia Family Court egregiously forced Appellant Deborah Young to return Children Cameron and Brianna to their abuser, Vincent Lang, when Deborah Young tried to protect her children from further Vincent Lang inflicted Criminal Assaults including choking, punching and throwing of person, terrorist threats, threat with a knife, assault, drunk driving, possession of controlled substance, contempt of court, domestic violence, stalking, etc.

34. Appellant Pro Se Exhibit 34. Justice For Families United Petition. Appellant Deborah Young and her children's long term victimization inflicted by Vincent Lang, caused by Philadelphia Family Court's failure to protect this family has resulted in Justice For Families, a grassroots community service Petition which is Cameron and Briana's last waning hope of rescue from the ongoing assaults of Vincent Lang whereon Cameron and Brian Detwiler have

written, “I love mom so much. I want to go home. My mom never hurt me’ and “Let people go home; Let kids be happy; Let me go home...”

35. Appellant Pro Se Exhibit 35. Justice For Families United Petition. Appellant Deborah Young and her children’s long term victimization inflicted by Vincent Lang, caused by Philadelphia Family Court’s failure to protect this family has resulted in Justice For Families, a grassroots community service Petition which is Cameron and Briana’s last waning hope of rescue from the ongoing assaults of Vincent Lang whereon Cameron and Brian Detwiler have written, “I love mom so much. I want to go home. My mom never hurt me’ and “Let people go home; Let kids be happy; Let me go home...”

36. Appellant Pro Exhibit 36. 01/23/07 Witness Statement testifying to Vincent Lang’s verbal assault and terror threats inflicted upon Appellant and her children Cameron and Briana Detwiler in public at the children’s school, St. Matthews.

37. Appellant Pro Se Exhibit 37. Docket Summary of Federal Official Corruption Fraud Civil Rights Action wherein Appellant Pro Se Deborah Young has recorded voluminous Proofs of the long term and ongoing Philadelphia Family Court mis-administration of the domestic relations issues for Appellant’s family and which have been exacerbated, intensified and enabled the ongoing and prolonged assaults and abuses of Vincent Lang, Appellee.

38. Appellant Pro Se Exhibit 38. Signature Page including Wherefore Paragraphs of Federal Official Corruption Fraud Civil Rights Action wherein Appellant Pro Se Deborah Young recorded voluminous proofs of the long term and ongoing Philadelphia Family Court mis-administration of the domestic relations issues for her Family and which have exacerbated, intensified and enabled the ongoing and prolonged assaults and abuses of Vincent Lang, Appellee.

**APPELLANT RESPECTFULLY PRAYS ON DECEMBER 16, 2009**

WHEREFORE, Appellant Pro Se Deborah Young prays this Honorable Pennsylvania Superior Court GRANT Appellant's Proposed Order for Summary Judgment Due To Appellee's Non Responsiveness and Non Compliance, or in the alternative, GRANT Proposed Order to Consolidate Pa Super 1875 EDA 200 with already consolidated Pa Super 2697 and 2699 and defer to Pennsylvania Superior Court's panel that will decide the merits of these related appeal matters.

Respectfully submitted,

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DEBORAH YOUNG

IN THE SUPERIOR COURT OF PENNSYLVANIA

IN RE:

Pa Super Docket No. 1875 EDA 2009

APPEAL OF D.Y.

RELATED AND CONSOLIDATED

Appeal from the Order entered June 15, 2009  
Court of Common Pleas, Philadelphia County  
Family Division at No. 0906V7858

Pa Super Docket 2697 EDA 2009  
Pa Super Docket 2699 EDA 2009

CERTIFICATE OF SERVICE

I, Deborah Young, affirm that I served Appellant's Motion for Summary Judgment Due To Appellee is Non Responsive and Non Compliant and Appellant's Alternative Motion for Consolidation of Pa Super 1875 EDA 2009 with Related Pa Super 2697 and 2699 EDA 2009, on the following parties by first class United States mail, postage prepaid on the 16th day of December, which satisfies the requirements of Rule 121 of the Pa. Rules of Appellate Procedure:

Vincent Lang  
3154 Longshore Avenue  
Philadelphia PA 19149

Arnold Laiken, Esquire  
Attorney Vincent Lang  
21 S. 12<sup>th</sup> Street, 7<sup>th</sup> Floor  
Philadelphia PA 19107

Hon. Ida K. Chen  
Philadelphia CCP Family Court  
34 S 11<sup>th</sup> Street  
Philadelphia PA 19107

Hon. Alice Beck Dubow  
Philadelphia CCP  
Family Courtroom H  
1801 Vine Street  
Philadelphia PA 19103

Michael Angelotti, Esquire  
Assistant City Solicitor  
City of Philadelphia Law  
Department, DHS  
1515 Arch Street  
Philadelphia PA 19103

Carlin Talib Saafir, Esquire  
1218 Chestnut Street, Ste 500  
Philadelphia PA 19107  
12/04/09 Protested Terminated  
for Willfully Prolonging Abuse  
of Subject Children.

Linda G. Walters, Esquire  
Terminated For Conflict of  
Interest no longer attorney for  
Deborah Young  
201 Bethlehem Pike,  
PO Box 168  
Flourtown PA 19107

December 16, 2009

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DEBORAH YOUNG