Lancaster County Prothonotary E-Filed - 18 Nov 2026 06:26:41 PM
Case Number: CI-24-08152

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Attorney for Defendant

JASON GARMAN and	:	
NOEL J. GARMAN	:	COURT OF COMMON PLEAS
	:	OF LANCASTER COUNTY,
Plaintiffs,	:	PENNSYLVANIA
vs.	:	
	:	CIVIL ACTION
IVAN REIFF,	:	
	:	No.: CI-24-08152
Defendant.	:	

DEFENDANT'S PETITION TO OPEN DEFAULT JUDGMENT

Defendant, respectfully petitions this Honorable Court to open the Default Judgment. In support thereof, Defendant avers as follows:

1. Defendant, Ivan Reiff, retained undersigned counsel on or about September 14, 2026.

2. As a courtesy, defense counsel entered an appearance on September 15, 2026, in order to notify the Court of the retention of defense counsel, subject to Defendant saving the funds necessary to pay a retainer. Previously, Defendant appeared *pro se*.

3. There are several explanations for the entry of the Default Judgment.

4. Unfortunately, Defendant has an alcohol problem, which he attributes in large part to the trauma caused by the relationship between Jason Garman and his young daughter, Peyton Reiff.

5. Defendant did not retain, or was otherwise unable to find, copies of the prior legal documents.

6. Further, Defendant is legally illiterate and did not even comprehend that a Default Judgment had been entered against him. To the contrary, Defendant relayed to undersigned counsel that the Court was very nice to him when he appeared at Hearings *pro se*.

7. Defendant has little or no money at this time. He could not find a local attorney willing to handle a case against Jason Garman, and he had substantial difficulty saving the funds necessary to pay a retainer for defense counsel.

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8. Defendant continued to believe that he would have his day in Court to explain what Plaintiff had done to his daughter, without knowledge or comprehension of the prior entry of a Default Judgment.

9. Pennsylvania law recognizes that a Petition to Open Default Judgment is addressed to the equitable powers of the Court. *Schultz v. Erie Insurance Exchange*, 477 A.2d 471, 472 (Pa. 1984). In exercising that discretion, the Court considers the promptness of the Petition, the explanation for the default, and the existence of a meritorious defense.

10. Defendant respectfully submits that the foregoing circumstances constitute a reasonable explanation for the default and warrant the exercise of the Court's equitable discretion.

11. Although belated, the Petition to Open is timely under the particular circumstances of this case.

12. Newly retained defense counsel met with Defendant on or about September 14, 2026, and awaited payment of the retainer before commencing the requisite legal services.

13. During the same period, undersigned counsel, Thomas F. Crawford, Esquire, age 70, was in and out of the office for medical reasons, and he is currently predominantly out of the office for approximately sixty (60) days for medical reasons, excepting monitoring only.

14. The timeliness of a Petition to Open is not governed by an inflexible number of days. Rather, the Court considers the circumstances surrounding the delay, including when the Defendant learned of the default judgment and the reasons for the delay. *Flynn v. America West Airlines*, 742 A.2d 695, 698 (Pa. Super. 1999).

15. Most importantly, if the Petition to Open is granted, the Civil Action will remain at the pleading stage.

16. In fact, the bulk of Plaintiffs' efforts have been directed toward a third party, Reddit, and there are remaining Motions by Plaintiffs against Reddit which have yet to be ruled upon by the Court.

17. Simply stated, there is no substantive prejudice to Plaintiffs if the Petition to Open is granted.

18. Defendant respectfully submits that the equities favor opening the Default Judgment and permitting a determination on the merits. See *Scalla v. KWS, Inc.*, 240 A.3d 131, 135–36 (Pa. Super. 2020) (recognizing the equitable considerations involved in determining whether a Default Judgment should be opened).

19. Further, there is an interplay between liability and the assessment of damages in this case. If the alleged statements by Defendant are substantially true and well known by other members of the community, then there is little or no reputational harm attributable to Defendant's alleged statements.

20. Defendant's daughter, Peyton Reiff, initially began providing babysitting services for the Garman children when she was a teenager.

21. In Plaintiffs' Brief in Support of the Motion for Hearing, Plaintiffs admit that, in or around 2020, Defendant Ivan Reiff's 19-year-old daughter was working for Mr. and Mrs. Garman as a childcare provider and that, around that time, Mr. Garman and Defendant's daughter had a romantic relationship.

22. That is only part of the story.

23. Defendant avers that the relationship commenced at an earlier date known only to Jason Garman and Peyton Reiff.

24. Peyton Reiff has complained that Jason Garman traumatized and sexually abused her in many ways in an effort to manipulate and coerce her into a sexual “relationship”.

25. Based upon information and belief, it is averred that Jason Garman has had sexual “relationships” with other much younger females.

26. Undersigned counsel has discovered another woman who has complained that she was raped as a minor by Jason Garman.

27. Upon information and belief, it is averred that Jason Gorman has had sexual “relationships” with other much younger females.

28. In Plaintiffs’ Brief, it is further admitted that the relationship ended and that Peyton moved out of state. Again, that is only part of the story.

29. The reason Peyton moved out of state was to get away from Jason Garman, who continued to contact and stalk her thereafter.

30. Currently, Peyton Reiff suffers from substantial mental health problems as a result of the trauma of her coerced “relationship” with Jason Garman.

31. Defendant has a meritorious defense to the Civil Action for defamation, namely, **truth**.

32. Under Pennsylvania law, truth is a complete defense to defamation. See 42 Pa.C.S. § 8343(b)(1). Moreover, substantial truth, rather than literal accuracy in every detail, is the governing principle. See *Tucker v. Philadelphia Daily News*, 848 A.2d 113 (Pa. 2004).

33. Here, the Court has only heard a small part of the underlying facts, all of which are one-sided as contained within Plaintiffs' Complaint.

34. Plaintiff admits that he had a sexual “relationship” with Peyton, who is much younger, despite the fact that he was married.

35. Defendant further avers, upon information and belief, that Peyton is not the only substantially younger female with whom Jason Garman has entered into a sexual “relationship.”[1]

36. There is a highly compelling reason to open the Default Judgment and permit discovery and the depositions of Plaintiffs for a full and fair Hearing on the merits.

37. Notably, patterns of such conduct are generally not isolated, as exemplified by belated revelations concerning Bill Cosby, Harvey Weinstein, and R. Kelly. However, the point is not to label anyone prematurely, but to provide a proper avenue for discovery and a full revelation of the facts.

38. As stated, there is an interplay between the underlying facts and the alleged damages.

39. Plaintiffs can hardly be heard to complain that their reputations were damaged by Peyton's father's statements when other members of the community already knew of the relationship between Jason Garman and Peyton Reiff and other younger females.

40. For financial reasons, Defendant does not seek endless discovery; however, Defendant respectfully requests the right to conduct the depositions of Plaintiffs, Jason Garman and Noel Garman, concerning the underlying conduct and the alleged damages, if any.

41. The standard for pleading a meritorious defense in a Petition to Open is liberal. Defendant is not required to prove his defense at this stage; rather, he must plead a defense which, if established at trial, would justify relief. *Seeger v. First Union National Bank*, 836 A.2d 163, 166 (Pa. Super. 2003); *Penn-Delco School District v. Bell Atlantic-Pennsylvania, Inc.*, 745 A.2d 14, 19 (Pa. Super. 1999).

42. Defendant's Proposed Answer to Plaintiffs' Complaint with New Matter, attached hereto as Exhibit “A”, sets forth meritorious defenses, including truth and justification.

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[1] Undersigned counsel is uncomfortable characterizing the circumstances involving Plaintiff, Jason Garman, and Defendant's daughter, Peyton Reiff, as a “relationship.” Based upon Peyton Reiff's statements, she was forced, manipulated, and coerced by Jason Garman into engaging in deviant sexual acts. Such conduct is a far cry from a consensual sexual relationship by any reasonable standard. To characterize the exploitation, coercion, and sexual exploitation of a young woman as merely a “romantic relationship” is not only misleading, but is self-serving to try to sanitize the very conduct at the heart of this litigation.

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43. Defendant respectfully submits that the Petition satisfies the equitable considerations governing the opening of a Default Judgment. Three (3) points should be emphasized:

a. The Petition is timely under the circumstances surrounding Defendant's retention and payment of newly retained defense counsel, his lack of comprehension of the Default Judgment, and counsel's medical unavailability.

b. There is no substantive prejudice to Plaintiffs if the Default Judgment is opened.

c. Defendant did not comprehend that a Default Judgment had been entered against him; and he believed that he was entitled to his day in Court, *pro se* or otherwise.

44. Pennsylvania Courts recognize the importance of considering all relevant circumstances and equities when determining whether a Default Judgment should be opened. See *Dumoff v. Spencer*, 754 A.2d 1280, 1282 (Pa. Super. 2000); *Scalla v. KWS, Inc.*, 240 A.3d 131, 135–36 (Pa. Super. 2020).

45. Defendant respectfully submits that this Civil Action should be determined upon its merits, with both Parties afforded the opportunity to present their respective evidence, rather than upon the procedural default of a legally unsophisticated Defendant who did not comprehend that a default judgment had been entered against him.

46. Defendant respectfully requests Oral Argument upon this Petition to Open Default Judgment.

WHEREFORE, Defendant, respectfully requests that this Honorable Court enter an Order opening the Default Judgment entered against Defendant, permitting Defendant to file the Proposed Answer to Plaintiffs' Complaint with New Matter, and allowing appropriate discovery, including the depositions of Plaintiffs.

Respectfully submitted,

THOMAS F. CRAWFORD, P.C.

Date: November 17, 2026

By: _____/S/_____
THOMAS F. CRAWFORD, ESQUIRE
Attorney for Defendant

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Plaintiffs,	:	PENNSYLVANIA
vs.	:	
	:	CIVIL ACTION
IVAN REIFF,	:	
	:	No.: CI-24-08152
Defendant.	:	

ORDER

AND NOW, this ___ day of _____, 2026, upon consideration of the Petition to Open Default Judgment by Defendant, it is hereby ORDERED, as follows:

1. The default judgment entered by Plaintiffs, Jason Garman and Noel J. Garman, is hereby STRICKEN.

2. The Petition to Open is GRANTED. The default judgment entered by Plaintiffs, Jason Garman and Noel J. Garman, is hereby OPENED.

3. Defendant shall file a responsive pleading to the Complaint within twenty (20) days of the date of this Order.

BY THE COURT:

_____
J.

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JASON GARMAN and	:	
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Plaintiffs,	:	PENNSYLVANIA
vs.	:	
	:	CIVIL ACTION
IVAN REIFF,	:	
	:	No.: CI-24-08152
Defendant.	:	

CERTIFICATE OF SERVICE

I, Cynthia Naula, certify that on this date, I served a certified true and correct copy of the foregoing Petition to Open upon the following by the Courts E-filing system and email:

Barley Snyder LLP
Lindsey M. Cook, Esquire
126 East King Street
Lancaster, PA 17602
(717) 399-2160
lcook@barley.com
Counsel for Plaintiffs

Stevens & Lee, P.C.
Nicholas H. Pennington, Esquire
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
(610)-205-6352
Nicholas.pennington@stevenslee.com
Counsel for Reddit, Inc

Date: November 17, 2026

By: _____
Cynthia Naula

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EXHIBIT “A”

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Attorney for Defendant

NOTICE TO PLEAD
TO PLAINTIFF: YOU ARE HEREBY NOTIFIED TO FILE A WRITTEN RESPONSE TO THE ENCLOSED NEW MATTER WITHIN TWENTY (20) DAYS FROM SERVICE HEREOF, OR A JUDGMENT MAY BE ENTERED AGAINST YOU.
/s/ Thomas F. Crawford
Attorney for Defendant

JASON GARMAN and	:	
NOEL J. GARMAN	:	COURT OF COMMON
	:	PLEAS OF LANCASTER COUNTY,
Plaintiffs,	:	PENNSYLVANIA
vs.	:	
	:	CIVIL ACTION
IVAN REIFF,	:	
	:	No.: CI-24-08152
Defendant.	:	

DEFENDANT'S ANSWER TO PLAINTIFFS' COMPLAINT WITH NEW MATTER

Defendant, answers Plaintiffs' Complaint, as follows:

1–4. Admitted.

5–7, 10–11. Denied, and strict proof demanded. The allegations contained in these paragraphs involve information within the exclusive knowledge of Plaintiffs.

8. It is admitted that Jason Garman is a part owner only of Garman Builders.

9. Admitted.

12. Denied. The allegations of this paragraph are expressly denied.

13. Denied as stated. It is acknowledged that Defendant, Ivan Reiff, has limited financial resources; however, that has nothing to do with the fact that Plaintiff, Jason Garman, hired Defendant's daughter, Peyton Reiff, as a babysitter for his children while she was a teenager, and that Jason Garman entered into a sexual relationship with Peyton commencing as of a date known only to Jason Garman and Peyton Reiff.

14–16. Denied as stated, and strict proof demanded. It is denied that the statements were false.

17. Denied, and strict proof demanded.

18–20**.** Denied, and strict proof demanded. It is denied that the statements were false.

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21. Denied. It is denied that the statements were false and fabricated for extortion purposes. The statements were made because Jason Garman was having a sexual relationship with Defendant's young daughter, Peyton Reiff.

22–23. Admitted in part and denied in part. It is admitted that persons in the community are afraid of Mr. Garman.

24. Denied, and strict proof demanded. Plaintiffs fail to attach a copy of the cease-and-desist notice.

25–26. Denied. Defendant incorporates by reference the answers to the preceding paragraphs.

27. Denied, and strict proof demanded. Plaintiffs fail to attach any supporting documents to the Complaint.

28. Denied. Defendant incorporates by reference his Answer to Paragraph 24 above.

29. Denied, and strict proof demanded.

30–31. Denied. Plaintiffs fail to attach copies of any supporting documents.

32. Denied, and strict proof demanded. This information is within the exclusive knowledge of Plaintiffs.

33–34. Denied. Defendant incorporates by reference the answers to the preceding paragraphs.

35. Denied, and strict proof demanded. Plaintiffs have issued Subpoenas to Reddit, which are pending. Plaintiffs fail to attach copies of any supporting documents memorializing any social media posts on Reddit.

36. Denied. Defendant incorporates by reference the answers to the preceding paragraphs.

37–38. Denied. Defendant incorporates by reference the Answer to Paragraph 22 above.

39–40. Denied, and strict proof demanded. Defendant incorporates by reference the answers to the preceding paragraphs.

41. Admitted in part and denied in part. Peyton Reiff began providing babysitting services for the Garman children while she was a teenager. Peyton Reiff has complained that Jason Garman traumatized and sexually abused her in many ways in an effort to manipulate and coerce her into a sexual “relationship”. Commencing as of a date known to Jason Garman and Peyton Reiff, Garman entered into a sexual “relationship” with Peyton. Likewise, based upon information and belief, it is averred that Jason Garman has had sexual relationships with other

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much younger females. Undersigned counsel has discovered another woman who has complained that she was raped as a minor by Jason Garman.

42. Denied. Defendant incorporates by reference the Answers to Paragraphs 12 and 31 above.

43. Denied as stated. Defendant incorporates by reference the answers to the preceding paragraphs. It is averred that the alleged statements were not false.

44. Denied, and strict proof demanded.

45–46. Denied, and strict proof demanded. The allegations contained in these paragraphs are within the exclusive knowledge of Plaintiffs.

47. Denied. Defendant incorporates by reference the answers to the preceding paragraphs.

COUNT I – DEFAMATION

48. Defendant incorporates by reference the answers to the preceding paragraphs.

49. Denied. It is denied that the alleged statements were malicious or false.

50. Denied. The statements were made by Defendant in an attempt to stop the harmful relationship between Jason Gorman and Peyton Reiff.

51. Denied. The allegations of this paragraph constitute conclusions of law to which no response is required. To the extent a response is required, same are denied, and strict proof demanded.

52–53. Denied, and strict proof demanded.

WHEREFORE, Defendant, respectfully requests the dismissal of Plaintiffs' Complaint.

NEW MATTER

Defendant, by and through undersigned counsel, avers the following New Matter:

54. In Plaintiffs' Brief in Support of Plaintiffs' Motion for Hearing, Plaintiffs admit that *"in or around 2020, Defendant Ivan Reiff's 20-year-old daughter was working for Mr. and Mrs. Garman as a child care provider. Around that time, Mr. Garman and Ivan Reiff's adult daughter had a romantic relationship."*

55. In fact, Peyton Reiff began providing babysitting services for the Garman children at a much younger age, while she was a minor.

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56. In the Brief, Plaintiffs further admit that the relationship *"ended two years later in 2020, and Mr. Reiff's daughter moved out of state shortly afterward."*

57. In fact, Peyton Reiff moved out of state to get away from Jason Garman, who continued to contact and stalk her.

58. Peyton Reiff has complained that Jason Garman, traumatized and sexually abused her in many ways, including but not limited to forcing her to engage in deviant sexual acts against her will.

59. Defendant's reaction was in response to Plaintiff Jason Garman's conduct, which Defendant perceived had traumatized his young daughter, Peyton Reiff, causing Peyton to suffer substantial mental health problems.

60. Defendant's reaction was his way of attempting to terminate the relationship between Jason Garman and his young daughter, Peyton Reiff, which Defendant perceived as harmful to his young daughter.

61. Defendant asserts the affirmative defense of truth.

62. Defendant asserts the affirmative defense of duress.

63. Defendant asserts the affirmative defense of estoppel.

64. Defendant asserts the affirmative defense of fair comment.

65. Defendant asserts the affirmative defense of justification.

66. Defendant asserts the affirmative defense of privilege.

67. Defendant asserts the affirmative defense of the statute of limitations, in whole or in part.

68. Plaintiffs' claims are barred by the doctrine of unclean hands.

69. Plaintiffs' claims are barred by Plaintiffs' own wrongful misconduct.

70. Defendant asserts the defense of improper service of process.

71. Plaintiffs fail to attach supporting documents to the Complaint.

72. Plaintiffs' Complaint abandons Garman Builders, Inc., as a named Plaintiff.

WHEREFORE, Defendant, Ivan Reiff, respectfully requests that this Honorable Court dismiss Plaintiffs' Complaint.

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Respectfully submitted,

THOMAS F. CRAWFORD, P.C.

Date: November 17, 2026

By: _____/S/_____
THOMAS F. CRAWFORD, ESQUIRE
Attorney for Defendant

PROTHONOTARY OF LANCASTER COUNTY

Andrew E. Spade
Prothonotary

GARMAN BUILDERS INC et al. VS IVAN REIFF	**CASE NUMBER** CI-24-08152

DEPOSIT RECEIPT

Printed: 11/19/2026 09:49 AM **Receipt No.: 219798**

Entry Date: 11/19/2026

Case Type: PETITION TO OPEN OR STRIKE

Paid By: Thomas Francis Thomas F. Crawford, P.C.

Order Number	*Order Date*	*Description*	*Deposit Amount*
O26024057	11/19/2026		$166.75

Mail To: **Thomas Francis Thomas F. Crawford, P.C.**
1361 taylor drive
langhorne, PA 19047

Received By: RM

