IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMY L. PELAIA,

Plaintiff,

v.

MATTHEW RUNK; CARNEGIE AUTO PARTS, INC. t/d/b/a NAPA AUTO PARTS also t/d/b/a NAPA AUTO PARTS OF CARNEGIE; and NATIONAL AUTOMOTIVE PARTS ASSOCIATION – NAPA AUTO PARTS t/d/b/a NAPA,

Defendant.

CIVIL DIVISION
GD 25-008338

ORDER OF COURT

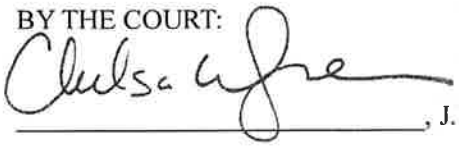
AND NOW, to wit, on this 15th day of October 2025, following considerations of the various submissions and legal memoranda submitted by the parties and after Oral Argument, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. All the Preliminary Objections filed by Matthew Runk and NAPA Auto Parts with respect to striking or demurring to the punitive damages sought in the Complaint are hereby OVERRULED, without prejudice to these Defendants to raise the issue of the dismissal of the punitive damages at a later juncture consistent with the Superior Court's *en banc* Opinion in the *Monroe* case. These defendants shall file their respective Answers within twenty (20) calendar days.

2. Plaintiff's Motion for Sanctions is DENIED. While *Monroe* stands for the proposition that punitive damages are not amenable to challenge at the pleadings stage provided a plaintiff has plead a prima facie claim of negligence and made averments of reckless conduct, this Court does not find these particular Preliminary Objections to have been an exercise in bad faith or done with dilatory purpose, since it strikes this Court as reasonable for Defendants to have tested the holding of *Monroe* against the facts of this case, which are more general and boilerplate in nature than those at issue in the *Cardillo* lawsuit relied upon by Plaintiffs' counsel. The punitive damages brought herein could be seen to represent the "outer limits" of the *Monroe* holding. Having analyzed *Monroe* as well as the cases from trial courts around the Commonwealth applying it, this Court is of the opinion that *Monroe* prevents punitive damages from being stricken at the

pleadings stage in almost all instances. In other words, *Monroe* has no "outer limits." If a plaintiff pleads correctly, punitive damages are available to them at the pleadings stage – and it is not for a trial court to try to look behind those averments. This Court questions the practical implications of such a bright-line rule. But nonetheless that is the law. Subsequent preliminary objections on the same grounds by defense counsel could possibly be worthy of sanctions in the future now that this ruling has been entered; since similar objections, absent a case specifically overruling *Monroe*, would prove to be quixotic, at best.

BY THE COURT:



_____, J.