

Exhibit O

BURTON WEISS, M.D.

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August 12, 2024

Max Dehon, Esq.
Saltz Mongeluzzi & Bendesky
One Liberty Place
1650 Market Street, 52nd Floor,
Philadelphia, PA 19103

Re: David Woodward

Dear Mr. Dehon:

David Woodward was Director of Public Works for West Goshen Township. A previous township manager started an informal policy to make snow days fair to employees who had to work when others had a paid day off. Hourly employees, such as workers in the Streets Department who would have to plow snow while other hourly workers were off, were allowed to take, on another day of their choice, time equivalent to the hours they spent working when others were off. When a new Township Manager took over, he informed Mr. Woodward and three other supervisors that what they did was fraudulent and illegal. He further said that they would be fired, arrested, and could be put in jail. This meeting was on July 20, 2023. Mr. Woodward was distraught after this meeting and killed himself by hanging himself behind a shed on his property on July 28, 2023. To understand Mr. Woodward's state of mind, I spoke with his wife Doreen Woodward on August 7, 2024, and reviewed the following documents:

1. Amended Complaint.
2. Death Certificate.
3. Deposition of Doreen Woodward.
4. Deposition of Emily Woodward.
5. Deposition of Christopher Bashore.
6. Kennett Square Police Incident Report.
7. David Woodward's suicide letter.

Ms. Woodward told me that her husband's baseline mood was happy and upbeat. He enjoyed spending time with his family and his daughter, going on family trips, going out to dinner, and enjoying other activities. He also took a great deal of pride in his career. Mr. Woodward worked his way up from a laborer to the Director of Public Works and was employed by the Township for over 22 years. He also attended educational programs on his own time to improve himself. Mr. Woodward was proud of his accomplishments.

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Mr. Woodward had no previous history of depression, mood swings, or any previous psychiatric or psychological treatment. He had a medical history of a torn interior cruciate ligament in his knee from a fall in 2018, which healed.

On July 20, 2023, Mr. Woodward and three other supervisors were told that they were committing fraud and could face jail time. Mr. Woodward himself never profited from the arrangement because he was a salaried employee. Only the hourly employees were paid for snow days or given compensatory time off.

Mr. Woodward and the three supervisors were placed on unpaid administrative leave on July 20, 2023. He was told that there would be an investigation that would last a week. Mr. Woodward expected to hear the results of the investigation and what would happen to him a week later, on July 27. During that week Mr. Woodward became increasingly more depressed and withdrawn. His wife noticed that he would sit in his chair in front of the television tuned to a Phillies game, as he often did, but that week he did not watch the program. He just stared at the television and was not himself. In the past he sometimes fell asleep in front of the television set, and occasionally spent the entire night in the chair. On July 27, the night before the suicide, Ms. Woodward thought that he fell asleep in his chair and didn't come to bed.

What Ms. Woodward told me is consistent with the information she provided in her deposition.

Mr. Woodward's suicide note explains that the sole reason for his decision to end his life was that he couldn't endure waiting to be fired from his job "that was my life." There was no other indication as to the reason for his suicide in the contained note. The note also gives us information about what Mr. Woodward was thinking and the kind of person he was.

Mr. Woodward thought about and felt sorry about how his suicide would affect his family and the lives of his coworkers (Mark, Mike, and Dorine). He thought about how his suicide would be a solution to his family's financial problems that would result from his firing and incarceration. He also thought that his suicide would spare his wife from suffering with him through his firing and subsequent legal problems, and having a husband who could no longer support his family. He declared his love for his wife and daughter. He gave instructions to his wife about closing his affairs with the Township and obtaining his insurance. He had specific comments for his daughter and father. Mr. Woodward went so far as protecting his wife from seeing his body by instructing her to call 911 and not go behind the shed where he took his life.

The suicide note also provides evidence of things that Mr. Woodward clearly was not: he was not impulsive, he was not distressed by problems other than with the Township, and he was not angry or being vindictive. His only concern was to protect and provide for his family. His only motivation was the intolerable pain of being fired from the job that defined his life.

Mr. Woodward's suicide was the direct result of the Township Manager telling him he that he committed fraud, would be fired, and would face serious legal consequences including jail time. This would not only end his career but also make it impossible for him to get another responsible job in the future. Mr. Bashore, the Township Manager, admitted in his testimony that he knew this had the potential to destroy Mr. Woodward's professional and personal lives, and that this would be

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very humiliating for Mr. Woodward since he had dedicated his professional life to serving the community. This situation would put a person like Mr. Woodward at high risk for self-harm and suicide.

My opinions are within a reasonable degree of medical certainty. I may modify my opinion if additional information becomes available.

Sincerely,

Burton Weiss, M.D.

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