

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet

Centre

County

For Prothonotary Use Only:

Docket No:

2025-CV-0662-CI

FILED FOR RECORD
2025 MAR 13 PM 2:45
JEREMY S. BREON
PROTHONOTARY
CENTRE COUNTY, PA

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Sherry Cramer

Lead Defendant's Name:

Singer Kader Neff Funeral Home and Cremation Service

Are money damages requested? ☒ Yes ☐ No

Dollar Amount Requested: ☐ within arbitration limits
(check one) ☒ outside arbitration limits

Is this a *Class Action Suit*? ☐ Yes ☒ No

Is this an *MDJ Appeal*? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: Louis T. Glantz, Esquire

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the **ONE** case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☒ Other: Negligence

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other

☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

- ☐ Zoning Board
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PA
CIVIL ACTION - LAW

SHERRY CRAMER,

Plaintiff,

v.

SINGER KADER NEFF FUNERAL HOME
AND CREMATION SERVICES, INC., and
GARRETT A. SINGER, Funeral Director,

Defendants.

Case No. 2025-CV-0662-CI

JURY TRIAL DEMANDED

Type of Pleading:
COMPLAINT

Filed on Behalf of:
Plaintiff

Counsel of Record for This Party:
Louis T. Glantz, Esquire
Pa I.D. No. 31657
Glantz, Johnson & Associates
1901 East College Avenue
State College, PA 16801
(814) 308-0904
(814) 238-8016 fax

**IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PA
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SHERRY CRAMER,

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AND CREMATION SERVICES, INC., and
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NOTICE

To: Singer Kader Neff Funeral Home and Cremation Services, Inc.

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator's Office
Centre County Courthouse
102 South Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-6727

Dated: February 27, 2025

/s/ Louis T. Glantz
Louis T. Glantz, Esquire
Pa I.D. No. 31657
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(814) 308-0904
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**IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PA
CIVIL ACTION - LAW**

SHERRY CRAMER,

Plaintiff,

v.

SINGER KADER NEFF FUNERAL HOME
AND CREMATION SERVICES, INC., and
GARRETT A. SINGER, Funeral Director,

Defendants.

Case No. 2025-CV-0062-CI

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Sherry Cramer ("Plaintiff") brings this action against Defendant Singer Kader Neff Funeral Home and Cremation Services, Inc. and Garrett A. Singer (collectively "Defendants") by and through her attorneys and alleges the following based on personal knowledge as to her own facts, and upon information and belief and the extensive investigation of counsel as to all other matters.

PARTIES

1. Plaintiff Sherry Cramer is an adult individual who resides in Pennsylvania Furnace, Pennsylvania, and is the decedent's daughter whose remains are at issue in this case.
2. Defendant Singer Kader Neff Funeral Home and Cremation Services, Inc. is a Pennsylvania corporation located at 135 W. Main Street, Howard, Pennsylvania, 16841.

3. Defendant Garrett A. Singer is the owner and funeral director of Singer Kader Neff Funeral Home and Cremation Services, Inc. He is an individual who resides in Tyrone, Pennsylvania.

4. At all relevant times, Defendants owned, operated, maintained, serviced, managed, supervised, possessed, and/or controlled all grounds, buildings, and premises located in Howard, Pennsylvania.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this matter pursuant to 42 Pa.C.S.A. § 931(a) and has personal jurisdiction pursuant to 42 Pa.C.S.A. § 5301 because Defendant Singer Kader Neff Funeral Home and Cremation Services, Inc., through its member Defendant Garrett A. Singer, is incorporated in the Commonwealth of Pennsylvania and conducts a continuous and systematic part of its business in the Commonwealth of Pennsylvania.

6. Venue is proper in the Court of Common Pleas of Centre County under Rule 2179 of the Pennsylvania Rules of Civil Procedure as Defendants' funeral home is located in Centre County and Defendants regularly conduct business in Centre County.

FACTUAL ALLEGATIONS

7. Joan Elizabeth Donley, born on May 26, 1932, passed away peacefully at her residence in Pennsylvania Furnace, Pennsylvania, on November 11, 2024.

8. Following her passing, Plaintiff, as the next of kin, engaged the services of Singer Kader Neff Funeral Home and Cremation Services, Inc. and Garrett A. Singer ("Defendants"), located in Howard, Pennsylvania, for the transportation, cremation, and procurement of a death certificate, for which the Defendants agreed to charge \$3,175.

9. The Singer Kader Neff Funeral Home was previously known as Kader Neff Funeral Home until a change in ownership occurred in July 2023, when Defendant Garrett A. Singer acquired the business and took over operations, renaming it Singer Kader Neff Funeral Home and Cremation Services, Inc.

10. Upon acquisition, Defendant Garrett A. Singer became responsible for the funeral home's operations, including compliance with legal, ethical, and professional standards governing the handling of human remains.

11. Additionally, Defendant Garrett A. Singer became responsible for complying with the legal requirements for maintaining a license under the State Board of Funeral Directors in the Commonwealth of Pennsylvania.

12. Following Ms. Donley's passing, the funeral home retrieved the body immediately after Plaintiff's initial contact, but did not require Plaintiff to sign any paperwork and did not collect payment at that time.

13. Plaintiff repeatedly contacted Defendants inquiring about the cremation, death certificates, and retrieval of her mother's ashes but received no clear response and never received the remains.

14. On one occasion, the funeral home informed Plaintiff that the coroner had her mother's body.

15. On another occasion, the funeral home informed Plaintiff that the funeral home had the ashes.

16. Defendants informed Plaintiff that there was an issue with the death certificate, but the funeral home gave no indication that there were any problems with the remains themselves.

17. On December 19, 2024, Plaintiff learned that the State Police and the coroner's office had arrived at the Defendants' funeral home in response to numerous complaints regarding missing death certificates.

18. Upon further inquiry, Plaintiff discovered that her mother's remains had not been cremated and had, in fact, had been left in the funeral home for six (6) weeks without refrigeration or proper storage.

19. Ms. Donley's body was found on a table, unembalmed, and in an advanced state of decomposition.

20. Initially, Plaintiff was told that the remains could not be identified. However, subsequent investigation revealed that identification was possible due to a hip replacement tag/ID number and dental records.

21. Investigators have indicated that they discovered additional bodies in the funeral home that may have been improperly handled as well.

22. Plaintiff, through counsel, previously filed a writ on December 20, 2024.

23. As a direct and proximate result of Defendants' actions, inactions, policies, and/or procedures, Plaintiff has endured significant and severe emotional distress, which has caused ongoing symptoms including but not limited to:

- a. Depression;
- b. Anxiety;
- c. Sleeplessness;
- d. Tearfulness;
- e. Distress;
- f. Anger;

- g. Shame;
- h. Guilt;
- i. Severe stress; and
- j. Physical manifestations of stress.

CAUSES OF ACTION

COUNT I **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

24. Plaintiff incorporates by reference each preceding and succeeding paragraph as though fully set forth at length herein.

25. Defendants owed a duty to Plaintiff to treat the decedent's body with dignity and respect.

26. Defendants breached their duty by, *inter alia*, failing to properly store the decedent's body, failing to prepare the decedent's body for cremation, failing to perform cremation services, allowing the decedent's body to decompose in Defendants' funeral home for six (6) weeks, failing to provide the cremains of the decedent's body to the authorized next of kin.

27. Defendants' conduct was extreme and outrageous and went beyond all possible bounds of decency.

28. As a direct and proximate result of Defendants' outrageous actions, Plaintiff has and continues to suffer severe emotional distress.

29. Plaintiff suffered damages as a result of Defendants' extreme and outrageous conduct.

COUNT II
NEGLIGENCE

30. Plaintiff incorporates by reference each preceding and succeeding paragraph as though fully set forth at length herein.

31. Defendants are in the business of performing cremation services.

32. Defendants, as a funeral home and cremation service provider, have duties imposed on them to comply with legal, ethical, and professional standards governing the handling of human remains.

33. Additionally, Defendants had a duty to Plaintiff to treat the remains of her loved one in accordance with Plaintiff's expectations and wishes and her direction and had a duty to ensure the dignified disposal of the decedent's remains.

34. Defendants breached this duty by failing to take reasonable steps to ensure that the remains of her loved one were properly handled and/or maintained for its intended purpose, and otherwise dignified disposal. As detailed herein, Defendants breached this duty through multiple, sustained negligent practices including:

- a. Failing to properly store the decedent's body;
- b. Failing to prepare the decedent's body for cremation;
- c. Failing to perform cremation services;
- d. Allowing the decedent's body to decompose in Defendants' funeral home for six (6) weeks;
- e. Failing to provide the cremains of the decedent's body to the authorized next of kin;
- f. Failing to note the advanced decomposition of human remains;
- g. Failing to maintain accurate records;

- h. Failing to abide by industry standards;
- i. Failing to otherwise use reasonable care in the operation of their business after being charged with the sacred duty to care for the deceased; and
- j. Other acts of negligence detailed herein.

35. Defendants' breach of this duty caused, both directly and proximately, severe emotional distress to Plaintiff.

COUNT III
GROSS NEGLIGENCE

36. Plaintiff incorporates by reference each preceding and succeeding paragraph as though fully set forth at length herein.

37. By contracting with Plaintiff, and accepting the care, custody and control over the remains of her loved one, Defendants assumed a duty of care to Plaintiff. Defendants' duties included, among other things:

- a. To maintain accurate and lawful records;
- b. To handle human remains with utmost dignity and respect;
- c. To employ policies and practices for mortuary services that avoid mishandling bodies;
- d. To operate in accordance with accepted industry standards; and
- e. To otherwise use reasonable care in the operation of their business.

38. Defendants breached their duties to Plaintiff as set forth herein, and failed to act with reasonable care in the operation of their business.

39. Defendants' breaches include, but are not limited to:

- a. Failing to properly store the decedent's body;
- b. Failing to prepare the decedent's body for cremation;

- c. Failing to perform cremation services;
 - d. Allowing the decedent's body to decompose in Defendants' funeral home for six (6) weeks;
 - e. Failing to provide the cremains of the decedent's body to the authorized next of kin;
 - f. Failing to note the advanced decomposition of human remains;
 - g. Failing to maintain accurate records;
 - h. Failing to abide by industry standards;
 - i. Failing to otherwise use reasonable care in the operation of its business after being charged with the sacred duty to care for the deceased; and
 - j. Other acts of negligence detailed here.
40. Defendants' breaches of their duties to Plaintiff were careless and/or reckless.
41. As a direct and proximate and foreseeable result of Defendants' breaches, Plaintiff suffered economic and non-economic damages, including physical injury due to the severe emotional distress described above.
42. Defendants knew that their careless and/or reckless actions would cause damages to Plaintiff.

COUNT IV
INTERFERENCE WITH A CORPSE

43. Plaintiff incorporates by reference each preceding and succeeding paragraph as though fully set forth at length herein.
44. While Plaintiff's loved one was taken to Defendants, her authorization was premised on the purpose of cremation services.

45. The authorization for cremation services was clearly not for the purpose of allowing the decedent's body to decompose in an unrefrigerated facility.

46. As described herein, Defendants' gross negligence and bad faith conduct enabled the decedent's body to remain unrefrigerated and improperly stored for six (6) weeks.

47. Accordingly, Defendants did not possess an absolute right to the disposition of Plaintiff's loved one's remains—Defendants had only the right to dispose of the remains in accordance with proper cremation services protocols.

48. Defendants' failure to do so resulted in harm to Plaintiff's possessory interest in her loved one's remains.

49. Defendants' wrongful and unauthorized interference with remains had a detrimental effect on the psychological well-being of Plaintiff.

50. As a direct and proximate result of Defendants' conduct, Plaintiff suffered the harm described herein.

COUNT V
BREACH OF CONTRACT

51. Plaintiff incorporates by reference each preceding and succeeding paragraph as though fully set forth at length herein.

52. Plaintiff contracted with Defendants for the transportation, cremation, and procurement of a death certificate, for \$3,175.

53. By the acts alleged herein, Defendants has breached this contract.

54. Moreover, every contract contains within it an implied covenant of good faith and fair dealing.

55. By the acts alleged herein, Defendants has breached that covenant of good faith and fair dealing in the most outrageous way imaginable.

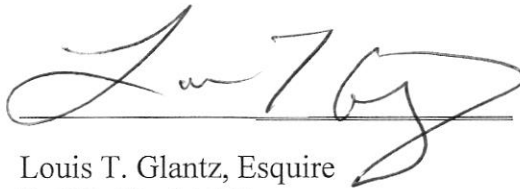
56. As a result of that breach, Plaintiff has suffered significant harm.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

- A. An award of compensatory damages in an amount deemed appropriate by the trier of fact, along with prejudgment and post-judgment interest;
- B. An award of punitive damages;
- C. An award of attorneys' fees and costs as permitted by law; and
- D. Any other relief which this Court deems just and proper or to which Plaintiff may be entitled as a matter of law.

Dated: March 12, 2025



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Pa I.D. No. 31657
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State College, PA 16801
(814) 308-0904
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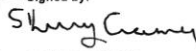
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jgs@sstriallawyers.com
jbk@sstriallawyers.com
jtm@sstriallawyers.com

Counsel for Plaintiff

VERIFICATION

I, Sherry Cramer, hereby state that the facts contained in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief. I make this Verification pursuant to 18 Pa. C.S. § 4904 pertaining to unsworn falsification to authorities.

Dated: 2/27/2025

Signed by:

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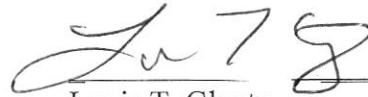
Sherry Cramer

CERTIFICATE OF SERVICE

I, Louis T. Glantz, hereby certify that I have on this date caused a true and correct copy of the foregoing document to be served by First Class U.S. Mail, postage prepaid, and electronic mail addressed to the following:

James J. Kutz, Esquire
17 North Second Street, 12th Floor
Harrisburg, PA 17101

Dated: March 12, 2025



Louis T. Glantz

CERTIFICATE OF COMPLIANCE

I, Louis T. Glantz, hereby certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Dated: March 12, 2025



Louis T. Glantz