

172  
DOCKET NO. \_\_\_\_\_

NUMBER	TERM	YEAR
22	November	1960

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Wheelock Buick, Inc.

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VERSUS  
Willard S. Robbins, Jr.

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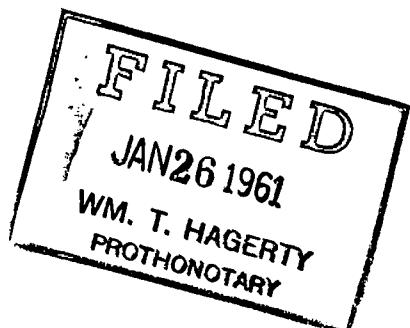
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WHEELOCK BUICK, INC., :  
Plaintiff :  
: :  
-vs- : No. 22 NOVEMBER TERM, 1960  
: :  
WILLARD S. ROBBINS, JR., : IN TRESPASS  
Defendant :  
:

TO WILLIAM T. HAGERTY, PROTHONOTARY:

SIR, mark the above case settled and discontinued on payment of costs.

GLEASON, CHERRY & CHERRY  
By Anthony J. Guido  
Attorneys for Plaintiff



WHEELOCK BUICK, INC., Plaintiff

VERSUS

WILLARD S. ROBBINS, JR., Defendant

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PA.

No. 22 Term November 19 60

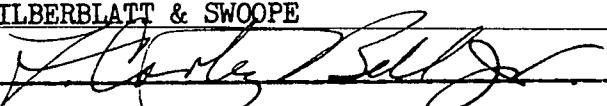
IN TRESPASS

To William T. Hagerty,  
Prothonotary.

Sir: Enter our appearance for Willard S. Robbins, Jr.,  
Defendant,

in above case.

BELL, SILBERBLATT & SWOPE

By: 

Attorney for Defendant

No. 22 Term November 1960

WHEELOCK-BUICK, INC., Plaintiff

vs.

WILLARD S. ROBBINS, Jr., Defendant

APPEARANCE

For Defendant



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Wheelock Buick, Inc. :: No. 22 November Term, 1960

vs :

Willard S. Robbins, Jr. : Complaint In Trespass

NOW, November 18, 1960 deputized the Sheriff of Luzerne County to serve the within Complaint In Trespass upon Willard S. Robbins, Jr.

NOW, November 22, 1960 served the within Complaint In Trespass upon Willard S. Robbins, Jr. by deputizing the Sheriff of Luzerne County. The return of service of Joseph Mock, Sheriff of Luzerne County, is hereto attached and made part of this return of service.

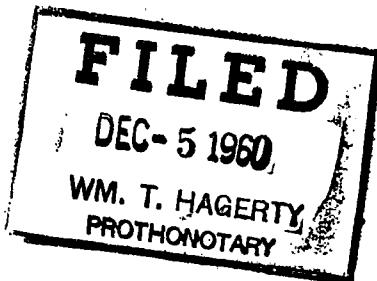
COSTS: Sheriff Ammerman \$6.00  
Sheriff of Luzerne County \$11.20  
(Paid by Attys G, C & C)

So answers,

CHARLES G. AMMERMAN  
Sheriff

Sworn to before me this 5th  
day of December A. D. 1960.

John T. Dugerty  
Prothonotary



LUZERNE COUNTY, SS:

TO THE HONORABLE THE JUDGE WITHIN NAMED:

I hereby certify and return that on Tuesday the 22nd day of November, 1960, at 11:00 A.M., I served the within Complaint In Trespass, upon the within named defendant, Willard S. Robbins, Jr., by handing to, Mrs. Hazle Robbins, his mother, an adult member of his family, at his place of residence, 176 Wyoming Avenue, Wyoming, Luzerne County, Pennsylvania, a certified copy of the within Complaint In Trespass, and making known to her the contents thereof.

Sworn to and subscribed  
before me this 2 day  
of December, 1960.

Allen W. Neiman  
Prothonotary

By H. Cerone

So answers,

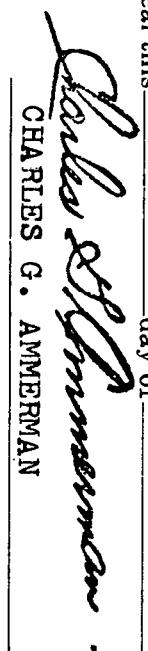
Joseph Mock  
Sheriff  
By J. T. Welker  
Deputy

7 - 4

Know all men by these Presents, That I, Charles G. Ammerman,  
High Sheriff of Clearfield County, State of Pennsylvania, do hereby depuitize Sheriff of  
Luzerne County to execute this writ; this deputation being made at the  
request and risk of the Plaintiff.

Given under my hand and seal this 18th day of November

A. D. 1960.

  
CHARLES G. AMMERMAN

Sheriff.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WHEELOCK BUICK, INC., Plaintiff : No. 22, 2nd Term,  
1960.  
-vs-  
WILLARD S. ROBBINS, JR., Defendant. : IN TRESPASS

COMPLAINT

AND NOW, comes the above entitled Plaintiff and files action in Trespass of which the following is a statement:

1. That WHEELOCK BUICK, INC., is a business corporation organized under the laws of the Commonwealth of Pennsylvania, with principal offices and place of business at No. 119 South Brady Street, in the City of DuBois, Clearfield County, Pennsylvania.
2. That WILLARD S. ROBBINS, JR., the above entitled Defendant, is a resident of No. 176 Wyoming Avenue, Wyoming, Pennsylvania.
3. That on January 12th, 1960, at about 5:30 P.M., E.S.T., a certain 1960 Buick Four Door Sedan, owned by the Plaintiff, was being operated by one of the Plaintiff's employees, J. SHERMAN OSBURN, in a Northerly direction on Railroad Avenue in the City of DuBois, Clearfield County, Pennsylvania, and had traversed two-thirds of the intersection of said Avenue with First Street and West DuBois Avenue in said City.

4. That at said time and place, said Defendant was the owner and operator of a certain 1954 Chevrolet Tudor Sedan, and was operating his vehicle in an easterly direction on said

West DuBois Avenue.

5. That at said time and place the vehicle operated by said Defendant, without any warning whatsoever, crossed into Plaintiff's lane of traffic, directly in front of said vehicle of the Plaintiff, causing the said vehicles to collide; as a result of which the said vehicle of the Plaintiff was damaged to the extent hereinafter set forth.

6. That at said time and place the said Defendant was reckless, careless and negligent in that he:

- (a) failed to yield the right of way to the vehicle of the Plaintiff;
- (b) caused his vehicle to collide with the vehicle of the Plaintiff;
- (c) was proceeding at an excessive rate of speed for traffic conditions;
- (d) failed to have his vehicle under proper and adequate control at said time and place; and
- (e) failed to have the said vehicle under such control as to be able to stop within the assured clear distance ahead.

7. That as a result of said collision the vehicle of the Plaintiff was damaged to the extent of Seven Hundred Seventy-Seven Dollars and Thirty-Six Cents (\$777.36).

WHEREFORE, for the sum of Seven Hundred Seventy-Seven Dollars and Thirty-Six Cents (\$777.36) together with costs of suit Plaintiff brings this Complaint.

GLEASON, CHERRY & CHERRY  
Attorneys for Plaintiff

By Anthony J. Guido

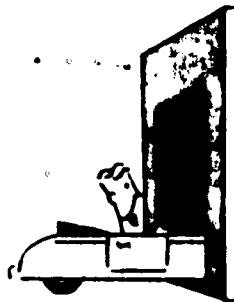
COMMONWEALTH OF PENNSYLVANIA : : SS.  
COUNTY OF CLEARFIELD : :

Personally appeared before me a Notary Public, in and for the County and State aforesaid, J. SHERMAN OSBURN, who, being duly sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.

J. Sherman Osburn

November, 1960. Sworn to and subscribed before me this 9<sup>th</sup> day of

Josephine O'Malley  
Notary Public  
My Com. expires Jan. 7, 1963.



## WHEELOCK BUICK INC.

DuBois, Pa.

Phone 630

NAME Wheelock Buck Inc

**NAME**

**ADDRESS** \_\_\_\_\_  
\_\_\_\_\_

DATE 1-13-60

**PHONE** \_\_\_\_\_

**DATE  
WANTED** \_\_\_\_\_

YEAR-MODEL	MAKE OF CAR	BODY TYPE	LICENSE NO.	SERIAL NO.	MOTOR NO.	MILEAGE
REPAIR	REPLACE					
				PARTS AND MATERIALS	LABOR	REFINISHING
		<u>Head.</u>		56.00	4.05	1125
		<u>Head bracket - front.</u>		1.50	1.35	
"	"	<u>Front.</u>		1.50		
"	"	<u>Front.</u>		.60		
		<u>Front Letters V-1-C-K.</u>		.80		
"	"	<u>Clips.</u>		.45		
		<u>Front Latch - Upper.</u>		2.25	1.35	
		<u>Front Strap - Side Fender.</u>		30.00	15.75	
		<u>Rod.</u>		108.15	4.05	
		<u>Front Blades.</u>		3.75	.45	
"		<u>Bolt.</u>		2.75		
		<u>Front Tie Strap.</u>		2.75	1.35	
		<u>Front Catch Beam (full)</u>		3.30	1.35	
		<u>Front Head Light (Door + Roof).</u>		4.50		
"		<u>Grille.</u>		32.50	4.50	
"		<u>Front.</u>		4.35		
N		<u>Parking Light Bar.</u>		9.00		
		<u>Front / Bumper.</u>		99.50	4.95	
"	"	<u>Front Bars.</u>		11.00		
		<u>Front Cross member (Bumper bar).</u>		6.00	15.30	
"		<u>Front "Front Bumper."</u>		5.25		
		<u>Front Bumper Rods.</u>		2.50		
		<u>Front Grill Chrome.</u>		2.50		
1		<u>Front Pencil.</u>		43.00	10.80	315
				TOTALS	-	
						14441

#### WE RECOMMEND

**DUCO-DULUX  
LUCITE  
AUTOMOBILE  
PAINTING**

THIS ESTIMATE IS BASED ON OUR INSPECTION AND DOES NOT COVER ADDITIONAL PARTS OR LABOR WHICH MAY BE REQUIRED AFTER THE WORK HAS BEEN STARTED. AFTER THE WORK HAS STARTED, WORK ON DAMAGED PARTS WHICH ARE NOT EVIDENT ON FIRST INSPECTION MAY BE DISCOVERED. NATURALLY, THIS ESTIMATE CANNOT COVER SUCH CONTINGENCIES. THIS ESTIMATE IS FOR IMMEDIATE ACCEPTANCE.

THIS WORK AUTHORIZED BY

**SALES TAX**

## GRAND TOTAL

## **ESTIMATE SHEET AND REPAIR ORDER**



**WHEELOCK BUICK INC.**

DuBois, Pa.

Phone 630

NAME \_\_\_\_\_

DATE \_\_\_\_\_

**ADDRESS**

**PHONE** 415-553-1111

DATE  
WANTED

**DUCO-DULUX  
LUCITE  
AUTOMOBILE  
PAINTING**

THIS ESTIMATE IS BASED ON OUR INSPECTION AND DOES NOT COVER ADDITIONAL PARTS OR LABOR WHICH MAY BE REQUIRED AFTER THE WORK HAS BEEN STARTED. AFTER THE WORK HAS STARTED, WORK ON DAMAGED PARTS WHICH ARE NOT EVIDENT ON FIRST INSPECTION MAY BE DISCOVERED. NATURALLY THIS ESTIMATE CANNOT COVER SUCH CONTINGENCIES. THIS ESTIMATE IS FOR IMMEDIATE ACCEPTANCE.

THIS WORK AUTHORIZED BY —

**ESTIMATE SHEET AND REPAIR ORDER**

**SALES TAX**

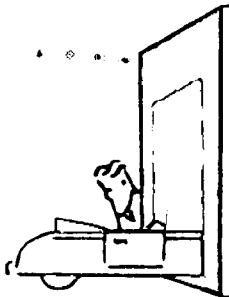
GRAND

## GRAND TOTAL

55664

2227

528189



**WHEELOCK BUICK INC.**

DuBois, Pa.

## Phono 630

NAME Ulysses S. Grant

DATE 1/15/63

ADDRESS \_\_\_\_\_

**PHONE** \_\_\_\_\_

**DATE  
WANTED**

**WORK SUB-LET**

## TOWING

**TOTALS**

161 85 25.20

**SALES TAX**

763

19649

197

THIS ESTIMATE IS BASED ON OUR INSPECTION AND DOES NOT COVER ADDITIONAL PARTS OR LABOR WHICH MAY BE REQUIRED AFTER THE WORK HAS BEEN STARTED. AFTER THE WORK HAS STARTED, WORK OR DAMAGED PARTS WHICH ARE NOT EVIDENT ON FIRST INSPECTION MAY BE DISCOVERED. NATURALLY THIS ESTIMATE CANNOT COVER SUCH CONTINGENCIES. THIS ESTIMATE IS FOR IMMEDIATE ACCEPTANCE.

THIS WORK AUTHORIZED BY

## ESTIMATE SHEET AND REPAIR ORDER

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA, No. 22, Term,  
1960. IN TRESPASS

WHEELOCK BUICK, INC.  
Plaintiff

-vs-

WILLARD S. ROBBINS, JR.,  
Defendant.

COMPLAINT

TO WITHIN NAMED DEFENDANT:

You are hereby notified to plead to the enclosed Complaint within Twenty (20) days from the service hereof.

GLEASON, CHERRY & CHERRY  
Attorneys for Plaintiff

589  
FILED  
NOV 10 1960  
WM. HAGEN, LAW OFFICES  
GLEASON, CHERRY & CHERRY  
7-1500 BROAD ST.  
DU BOIS, PENNSYLVANIA

109 N. BRADY STREET

4/8/60  
4/8/60