

DOCKET NO. 172

NUMBER	TERM	YEAR
22	November	1960

Wheelock Buick, Inc.

VERSUS

Willard S. Robbins, Jr.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WHEELOCK BUICK, INC.,  
Plaintiff

-vs-

WILLARD S. ROBBINS, JR.,  
Defendant

:  
:  
:  
:  
:  
:  
:

No. 22 NOVEMBER TERM, 1960

IN TRESPASS

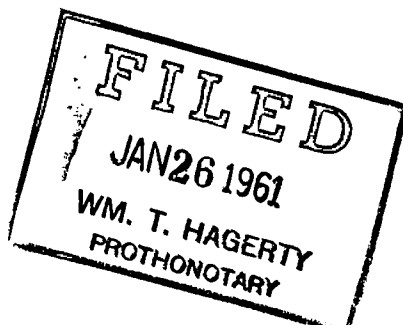
TO WILLIAM T. HAGERTY, PROTHONOTARY:

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

GLEASON, CHERRY & CHERRY

By

*Anthony S. Girds*  
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 & SWOOPE

By: 

Attorney for Defendant

No. 22 Term November 19 60

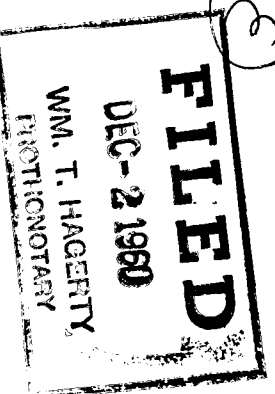
WHELOCK BUICK, INC., Plaintiff

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

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(SHERIFF'S RETURN)

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

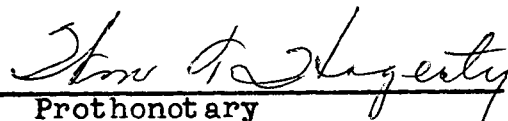
NOW, November 22, 1960 served the within Complaint In Trespass upon Willard S. Robbins, Jr. by deputizing the Sheriff of Luzerne County. The return of service of Joseph Mock, Sheriff of Luzerne County, is hereto attached and made part of this return of service.

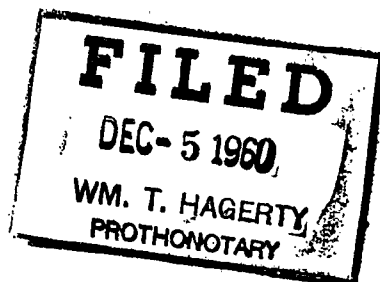
COSTS: Sheriff Ammerman \$6.00  
Sheriff of Luzerne County \$11.20  
(Paid by Attys G, C & C)

So answers,

  
CHARLES G. AMMERMAN  
Sheriff

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

  
Prothonotary



17  
LUTZERNE 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. Holman  
Prothonotary

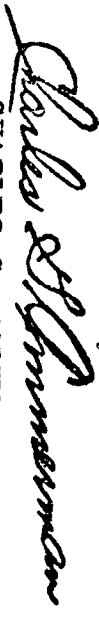
By A. C. Cramer

So answers,

Joseph Duob  
Sheriff  
By L. J. Walker  
Deputy

Know all men by these presents, That I, Charles G. Ammerman  
High Sheriff of Clearfield County, State of Pennsylvania, do hereby deputize 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  
60  
A. D. 19        .

  
CHARLES G. AMMERMAN          Sheriff.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WHEELOCK BUICK, INC.,  
Plaintiff

-vs-

WILLARD S. ROBBINS, JR.,  
Defendant.

:  
: No. 22, Nov Term,  
: 1960.  
:

: 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

Sworn to and subscribed before me this 9<sup>th</sup> day of

November, 1960.

Josephine M. Cherry  
Notary Public  
My Com. expires Jan. 7, 1963.



# WHELOCK BUICK INC.

SALES

SERVICE

DuBois, Pa.

Phone 630



NAME Wheelock Buick Inc

DATE 1-13-60

ADDRESS \_\_\_\_\_

PHONE \_\_\_\_\_

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

YEAR-MODEL		MAKE OF CAR	BODY TYPE	LICENSE NO.	SERIAL NO.	MOTOR NO.	MILEAGE	
1960		Buick	4419		461024225		00010	
REPAIR	REPLACE					PARTS AND MATERIALS	LABOR	REFINISHING
		Hood.				56 00	4 05	1125
		Hood bracket - Left				1 50	1 35	
		" " " "				1 50		
		" " " "				60		
		Hood Latch U-1 - C.H.				80		
		" " " " Clips				45		
		Hood Latch - Upper				2 25	1 35	
		Rad. Strap - Short Fender				30 00	15 75	
		Rad.				10 8 15	4 05	
		Fron Blades				3 75	45	
		" " Bolt				2 75		
		Fron Tie Strap				2 75	1 35	
		Hood Catch Bar "Grille"				3 35	1 35	
		Left Head Light Door & Bezel				4 50		
		" Grille				32 50	4 50	
		" " Emb.				4 35		
		N Parking Light Body				9 00		
		Front Bumper				99 50	4 95	
		" " " " Back Bar				11 00		
		Front Cross member "Bumper"				6 00	15 30	
		" " " " " " " "				5 25		
		Front "Hind" Bar Rods				2 50		
		WORK SHIP "Grille Chrome"				2 50		
1		TUNING 6. Front Fender				43 00	10 80	3 15
TOTALS						-	-	1440



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.

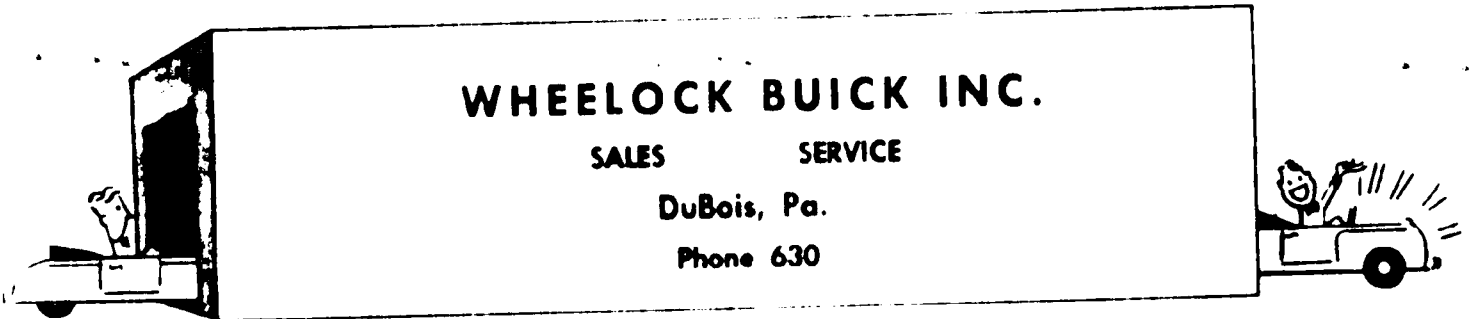
THIS WORK AUTHORIZED BY \_\_\_\_\_

SALES TAX

GRAND TOTAL

ESTIMATE SHEET AND REPAIR ORDER

A-2121 REV. 4-58



# WHEELOCK BUICK INC.

SALES

SERVICE

DuBois, Pa.

Phone 630

NAME \_\_\_\_\_

DATE \_\_\_\_\_

ADDRESS \_\_\_\_\_

PHONE \_\_\_\_\_

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

YEAR-MODEL		MAKE OF CAR	BODY TYPE	LICENSE NO	SERIAL NO	MOTOR NO	MILEAGE	
1960		Buick	4419				00010	
REPAIR	REPLACE					PARTS AND MATERIALS	LABOR	REFINISHING
<del>REDACTED</del> 1. R. Front End 1. Frame Align Front End.							6.00	
							13.00	
							7.50	
Paint & material						14.00		
WORK SUB-LET								
TOWING								
TOTALS						447.95	94.25	542.20



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 TOTAL

536.60  
22.27  
558.87

**WHEELÖCK BUICK INC.**

**SALES**

## SERVICE

**DuBois, Pa.**

**Phono 630**

NAME \_\_\_\_\_

DATE \_\_\_\_\_

**ADDRESS****PHONE**

DATE \_\_\_\_\_

**DATE  
WANTED**

YEAR-MODEL 60	MAKE OF CAR Ford	BODY TYPE -120	LICENSE No	SERIAL No 45122423	MOTOR No	MILEAGE 20025
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[illegible]

**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, WORN 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

**SALES TAX**

**GRAND  
TOTAL**

## ESTIMATE SHEET AND REPAIR ORDER

A-3272 REV. 4-63

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

WHEELLOCK BUICK, INC.,  
Plaintiff

-VS-

WILLARD S. ROBBINS, JR.,  
Defendant.

COMPLAINT

TO WITHIN NAMED DEFENDANT:

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

GLEASON, CHERRY & CHERRY  
Attorneys for Plaintiff

589  
By Willard S. Robbins

**FILED**  
NOV 10 1960

LAW OFFICES  
WM. J. HAGERTY  
GLEASON, CHERRY & CHERRY  
7-189 DANKUS BUILDING  
DU BOIS, PENNSYLVANIA

109 N. BRADY STREET

4:58 PM