

00-21-CD
SANDRA ARRINGTON -vs- DALE EUGENE SHAW

61
SANDRA ARRINGTON, : IN THE COURT OF COMMON PLEAS
Plaintiff : OF CLEARFIELD COUNTY,
: PENNSYLVANIA
:
v. :
: CIVIL ACTION - LAW
240 DALE EUGENE SHAW, :
Defendant : No. 00-21-CJ

NOTICE TO DEFEND

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 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 OR KNOW A LAWYER, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

LAWYER REFERRAL SERVICE - Court Administrator's Office
1 North Second Street
Clearfield, PA 16830

Telephone (814) 765-2641, Ext: 50

FILED

JAN 06 2001

William A. Sh:
Prothonotary

SANDRA ARRINGTON,	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	OF CLEARFIELD COUNTY,
	:	PENNSYLVANIA
	:	
v.	:	
	:	CIVIL ACTION - LAW
	:	
DALE EUGENE SHAW,	:	
Defendant	:	No. -

COMPLAINT

AND NOW, comes the Plaintiff, Sandra Arrington, by and through her attorneys Edgar Snyder and Associates, LLC, and Kevin C. Jennings, Esquire, and files this Complaint and states the following in support thereof:

1. The Plaintiff, Sandra Arrington, is an adult individual currently residing at 632 West 17th Street, Erie, Pennsylvania 16502.
2. The Defendant, Dale Eugene Shaw, is an adult individual with a last known address of RR#1, Box 685, Osceola Mills, Pennsylvania 16666.
3. On or about May 24, 1998, the Plaintiff, Sandra Arrington, was operating a 1995 Geo Tracker in a northerly direction on State Route 153, in Clearfield County, Pennsylvania. The Plaintiff, Sandra Arrington, slowed her vehicle in response to traffic conditions at or about the intersection of State Route 153 and Township Road 318.
4. On the same date time and location the Defendant, Dale Eugene Shaw, was operating a 1990 Chevrolet Blazer in a northerly direction on State Route 153. For unknown reasons Defendant, Dale Eugene Shaw, did not stop and\or slow his vehicle in response to traffic conditions and collided with the rear end of the Plaintiff's vehicle. The force of the impact of this collision was such as to force the Plaintiff's vehicle into

the vehicle in front of her.

5. The injuries and damages hereinafter set forth were caused by and were the direct and proximate result of the negligence and carelessness of the Defendant, Dale Eugene Shaw, as aforesaid and in the following particulars:

- a. In failing to maintain a vigilant and careful lookout for other vehicles on the road way;
- b. In failing to maintain the assured clear distance ahead;
- c. In failing to pay safe and careful attention to the roadway;
- d. In failing to stop, slow or turn said vehicle aside when the Defendant knew or should have known through the exercise of reasonable care that if the vehicle were permitted to proceed, a collision would result;
- e. In failing to yield the right-of-way to the Plaintiff who was entitled thereto under the circumstances;
- f. In failing to keep a safe, careful and adequate lookout for others on the roadway, including the Plaintiff's vehicle;
- g. In failing to inspect, repair, service and /or otherwise maintain the vehicle he was operating , including the braking thereof, in a safe and proper working condition such that the failure to do so was an unsafe operation of the vehicle;
- h. In failing to keep the Defendant's vehicle under control;
- i. In operating said Defendant's vehicle into a collision with the automobile of the Plaintiff;

6. As a direct and proximate result of the negligence, carelessness and

recklessness of the Defendant, Dale Eugene Shaw, as aforesaid, the Plaintiff, Sandra Arrington, sustained the following sever and serious injuries, all of which may be permanent in nature:

- a. Multiple contusions and abrasions upon her body;
- b. Loss of health, strength, vigor and vitality;
- c. Cervical and lumbar sprain and strain;
- d. Headaches;
- e. Aggravation of pre-existing cervical conditions;
- f. Chronic low back pain;

7. As a further direct and proximate result of the aforesaid accident, the Plaintiff, Sandra Arrington, has been and will be obliged to receive and undergo medical attention and care and to expend various sums of money and to incur various expenses, which expenses have or may exceed the sum recoverable under the limits in 75 Pa. C.S.A. §1711, and may be obliged to expend such sums or incur such expenditures for an indefinite time in the future.

8. As a further result of this accident, the Plaintiff, Sandra Arrington, has suffered severe physical pain, mental anguish, humiliation, embarrassment, emotional distress, loss of enjoyment of life, loss of vitality, vigor, health, range of motion and strength and may continue to suffer the same for an indefinite time in the future.

9. At all times relevant to this Complaint, the Plaintiff, Sandra Arrington, suffered a serious bodily injury and is entitled to recover non-economic benefits under the Pennsylvania Motor Vehicle Financial Responsibility Law.

10. As a further direct and proximate result of the aforesaid accident, the Plaintiff, Sandra Arrington, has sustained a severe loss of earnings and/or an

impairment of her earning capacity and power, which such loss of income and/or impairment of earning capacity has or may exceed the sums recoverable under the limits in 75 Pa. C.S.A. §1711.

WHEREFORE, the Plaintiff, Sandra Arrington, demands judgment in her favor and against the Defendant, Dale Eugene Shaw, in an amount in excess of arbitration limits in Clearfield County, Pennsylvania, plus costs of this proceeding.

A JURY TRIAL OF 12 IS HEREBY DEMANDED.

Respectfully submitted,

EDGAR SNYDER & ASSOCIATES, LLC

By 
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

SANDRA ARRINGTON, : IN THE COURT OF COMMON PLEAS
Plaintiff : OF CLEARFIELD COUNTY,
: PENNSYLVANIA
: :
v. : CIVIL ACTION - LAW
: :
DALE EUGENE SHAW, : :
Defendant : NO.

VERIFICATION

I, Sandra Arrington, Plaintiff herein, hereby verify that the averments of fact contained in the foregoing Complaint are true and correct and based upon my personal knowledge, information or belief. I understand that these averments of fact are made subject to the penalties of 18 Purdons Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.

Sandra M Arrington
Plaintiff, Sandra Arrington

Date: 12-7-99

FILED

RECD
JAN 06 2000
M 11:44 A.M. C.C. Shuf.
William A. Shaw
Prothonotary Atty. Pay \$80.00

7

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
Plaintiff, :
v. : TYPE OF PLEADING:
DALE EUGENE SHAW, : **PRAECIPE FOR ENTRY OF**
Defendant. : **APPEARANCE**
: :
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**
: :
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

JAN 14 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,	:	No. 00-21-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
DALE EUGENE SHAW,	:	
	:	
Defendant.	:	

PRAECIPE FOR ENTRY OF APPEARANCE

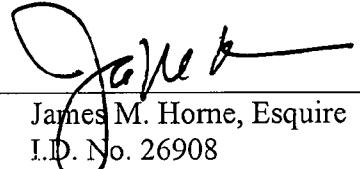
TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, Dale Eugene Shaw, in the above-captioned matter.

We are authorized to accept service on behalf of Dale Eugene Shaw.

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: January 13, 2000

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
: Plaintiff, :
: v. :
DALE EUGENE SHAW, :
: Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praeclipe for Entry of Appearance on behalf the Defendant, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 13th day of January, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
100 State Street, Suite 205
Erie, PA 16507-1454
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

(3)

SANDRA ARRINGTON,
Plaintiff,
DALE EUGENE SHAW,
Defendant.

No. 00-21-C.D.

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

(AN 18 2000)

William A. Shaw
Notary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

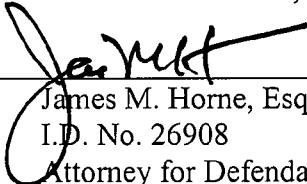
SANDRA ARRINGTON, : No. 00-21-C.D.
: Plaintiff, :
: v. :
DALE EUGENE SHAW, :
: Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Interrogatories Propounded by Defendant Shaw for Answer By Plaintiff (Set One) and Request for Production (Set One) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 19 1 day of January, 2000, to the attorneys/parties of record:

Kevin C. Jennings, Esquire
Edgar Snyder & Associates, LLC
100 State Street, Suite 205
Erie, PA 16507-1454
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

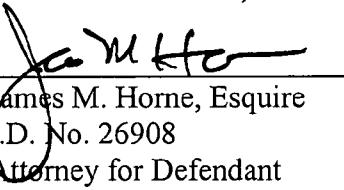
SANDRA ARRINGTON, : No. 00-21-C.D.
: :
Plaintiff, : :
: :
v. : :
: :
DALE EUGENE SHAW, : :
: :
Defendant. : :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Shaw's Second Request For Production of Documents and Tangible Things By Defendant Directed to Plaintiff in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 14th day of January, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
100 State Street, Suite 205
Erie, PA 16507-1454

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

:
: TYPE OF PLEADING:
: **Answer with New Matter,**
: **with Certificate of Service**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

JULY 10 2001

WILLIAM A. SHAW
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,	:	No. 00-21-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
DALE EUGENE SHAW,	:	
	:	
Defendant.	:	

DEFENDANT'S ANSWER WITH NEW MATTER

AND NOW, comes Defendant, by and through his undersigned counsel, McQuaide, Blasko, Schwartz, Fleming & Faulkner, Inc., and files the within Answer with New Matter to Plaintiff's Complaint, and in support thereof, avers as follows:

1. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1. The same are therefore denied and strict proof thereof demanded.
2. Admitted.
3. Admitted that on or about May 24, 1998, the Plaintiff Sandra Arrington was operating a 1995 Geo Tracker in a northerly direction on State Route 153, in Clearfield County, Pennsylvania. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations of paragraph 3. The same are therefore denied and strict proof thereof demanded.
4. Admitted in part and denied in part. It is admitted that on the same date, time and location, the Defendant Dale Eugene Shaw was operating a 1990 Chevrolet Blazer in a northerly direction on State Route 153. It is further admitted that the front of the vehicle operated by

Defendant Shaw came into contact with the rear of the vehicle operated by Plaintiff. It is further admitted that the front of the vehicle operated by Plaintiff also came into contact with the rear of another vehicle in front of Plaintiff. The balance of the allegations of paragraph 4 are denied as stated. To the contrary, upon observing traffic in front of him suddenly slow and/or stop, Defendant Shaw made all reasonable efforts to bring his vehicle to a stop and avoid any impact. Despite his best efforts, as set forth herein the front of Defendant's vehicle did make contact with the rear of Plaintiff's vehicle.

5. a. – i. The allegations of paragraphs 5 a through i are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

6. – 10. After reasonable investigation, Defendant is without knowledge of information sufficient to form a belief as to the truth of the allegations of paragraphs 6 through 10, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Dale Eugene Shaw requests that the Complaint filed by the Plaintiff Sandra Arrington be dismissed, with prejudice and costs of suit.

NEW MATTER

11. Defendant hereby raises and asserts all those defenses and/or limitations on damages available to him by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

12. To the extent Plaintiff was insured under a policy of insurance bearing the limited tort option, Plaintiff is barred from the recovery of non-economic damages.

13. Plaintiff did not sustain a serious bodily injury sufficient to overcome the selection, if any, of the limited tort option.

14. To the extent Plaintiff's medical expenses and lost wages, if any, have been paid

or are payable under a policy of insurance, the same may not be plead, proven or recovered in the instant action.

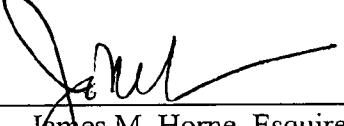
15. Plaintiff's injuries and damages, if any, are in whole or in part the result of pre-existing and/or other medical conditions unrelated to the accident at issue.

WHEREFORE, Defendant Dale Eugene Shaw requests that the Complaint filed by the Plaintiff Sandra Arrington be dismissed, with prejudice and costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: 1/14/00

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
:
Plaintiff, :
:
v. :
:
DALE EUGENE SHAW, :
:
Defendant. :
:

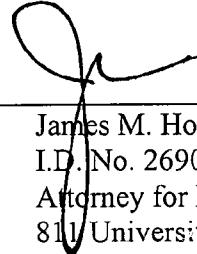
NOTICE TO PLEAD

TO: Sandra Arrington
% Kevin C. Jennings, Esquire

YOU ARE HEREBY notified to plead to the within New Matter within twenty (20) days
from the date of service hereof or a default judgment may be entered against you.

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: 1/12/00

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

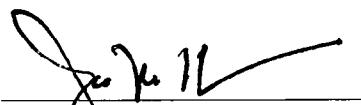
SANDRA ARRINGTON, : No. 00-21-C.D.
: :
Plaintiff, : :
: :
v. : :
: :
DALE EUGENE SHAW, : :
: :
Defendant. : :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answer with New Matter, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 14th day of January, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
100 State Street, Suite 205
Erie, PA 16507-1454
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

5
KEVIN C. JENNING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARRINGTON, SANDRA
VS
SHAW, DALE EUGENE

00-21-CD

FILED

COMPLAINT

SHERIFF RETURNS

JAN 20 2000

013181pm.

William A. Shaw
Prothonotary

NOW JANUARY 10, 2000 AT 1:05 PM EST SERVED THE WITHIN
COMPLAINT ON DALE EUGENE SHAW, DEFENDANT AT RESIDENCE RR 1
BOX 685, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA BY
HANDING TO LEANN SHAW, WIFE A TRUE AND ATTESTED COPY OF THE
ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS
THEREOF.

SERVED BY: NEVLING

28.73 SHFF. HAWKINS PAID BY: ATTY
10.00 SURCHARGE PAID BY: ATTY

SWORN TO BEFORE ME THIS

20th DAY OF January 2000
William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co., Clearfield, PA.

SO ANSWERS,

Chester A. Hawkins
My Marilyn Hanner

CHESTER A. HAWKINS
SHERIFF

6
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

JAN 27 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
Plaintiff, :
v. :
DALE EUGENE SHAW, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things Directed to: Clearfield Hospital, Dr. Amato B. Lague, Presquile Family Medicine, Metro Health Center, Dr. John A. Fabre, Tri-state Pain Institute, Team Physicians of Ohio, Industrial and Sports Medicine Center, Pennsylvania State Department of Corrections/State Correctional Institution at Houtzdale, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 26th day of January, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I. D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

(7)

SANDRA ARRINGTON, : IN THE COURT OF COMMON PLEAS
Plaintiff : OF CLEARFIELD COUNTY,
: PENNSYLVANIA
: :
: v. :
: :
: : CIVIL ACTION - LAW
: :
DALE EUGENE SHAW, :
Defendant : No. 00-12-C.D.
: 21

FILED

JAN 31 2000

William A. Shaw
Prothonotary

REPLY TO NEW MATTER

AND NOW, comes the Plaintiff, SANDRA ARRINGTON, by and through her counsel, EDGAR SNYDER & ASSOCIATES, LLC, and Kevin C. Jennings, Esquire, and files the within Reply To New Matter and states the following in support thereof:

11. The averments of Paragraph #11 of the Defendant's New Matter state conclusions of law to which no responsive pleading is required and the same is therefore deemed to be denied.
12. The averments of Paragraph #12 of the Defendant's New Matter state conclusions of law to which no responsive pleading is required. To the extent an answer is required the same are deemed to be denied. And further Answer hereto at all times relevant to this Complaint the Plaintiff had a full tort policy in effect. Attached hereto is Exhibit A, a photocopy of the insurance declaration sheet indicating the Plaintiffs full tort selection.
13. The averments of Paragraph #13 of the Defendant's New Matter state conclusions of law to which no responsive pleading is required. To the extent an answer is required these averments are hereby deemed to be denied. And further Answer hereto Paragraph #12 of this Reply To New Matter is incorporated herein and is

set forth in its entirety.

14. The averments of Paragraph #14 of the Defendant's New Matter state conclusions of law to which no responsive pleading is required. To the extent an answer is required the same are deemed to be denied.
15. The averments of Paragraph #15 of the Defendant's New Matter state conclusions of law to which no responsive pleading is required. To the extent an answer is required the same are deemed to be denied.

Respectfully submitted,

EDGAR SNYDER & ASSOCIATES, LLC



Kevin C. Jennings, Esquire
PA I.D. #55838
Attorney for Plaintiff, Sandra Arrington
1600 Peninsula Drive, Suite F
Erie, Pennsylvania 16505

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served upon all Counsel appearing of record by First-Class United States Mail on January 28, 2000.



Kevin C. Jennings, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

: No. 00-21-C.D.

Plaintiff,

: TYPE OF PLEADING:

: **Prerequisite to Service of Subpoenas**

v.

DALE EUGENE SHAW,

: TYPE OF CASE: CIVIL

Defendant.

: FILED ON BEHALF OF:

: **DEFENDANT**

:

: COUNSEL OF RECORD FOR

: FOR THIS PARTY:

: JAMES M. HORNE, ESQ.

: I.D. NO. 26908

: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.

: 811 University Drive

: State College, PA 16801

: PH# (814) 238-4926

: FAX#(814) 238-9624

FILED

FEB 04 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
: :
Plaintiff, : :
: :
v. : :
: :
DALE EUGENE SHAW, : :
: :
Defendant. : :

PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22., Defendant certifies that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas were sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: 2-3-00

By: _____

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,	:	No. 00-21-C.D.
	:	
Plaintiff,	:	
	:	
V.	:	
	:	
DALE EUGENE SHAW,	:	
	:	
Defendant.	:	

**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY**

Defendant intends to serve ten (10) subpoenas identical to the subpoenas that are attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: January 26, 2000

By: _____

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: CLEARFIELD HOSPITAL, P.O. BOX 992, CLEARFIELD, PA 16830

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: DR. AMATO B. LUGUE, 500 TURNPIKE AVENUE, CLEARFIELD, PA 16830
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON, SS#177-52-9210 D/O/B 3/3/65.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: PRESQUISLE FAMILY MEDICINE, 2556 WEST 12TH STREET, ERIE PA 16505
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: METRO HEALTH CENTER, 252 WEST 11TH STREET, ERIE PA 16501

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: DR. JOHN A. FABRE, 529 SUNFLOWER DRIVE, DUBOIS PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON. SS#177-52-9210 D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: DR. JOHN A. FABRE, 807 TURNPIKE AVENUE, CLEARFIELD, PA 16830
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING TO
SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE

STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: TRI-STATE PAIN INSTITUTE, P.O. BOX 239 ERIE, PA 16512-0239 (2558 W. 12TH STREET)
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING TO
SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: TEAM PHYSICIANS OF OHIO. 5148 PEACH STREET. #250. ERIE PA 16509
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON. SS#177-52-9210. D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: INDUSTRIAL & SPORTS MEDICINE CENTER 21 NORTH 2ND STREET CLEARFIELD PA 16830
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238 4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: PENNSYLVANIA STATE DEPARTMENT OF CORRECTIONS, STATE CORRECTIONAL INSTITUTE AT HOUTZDALE
PO BOX 1000, HOUTZDALE, PA (Name of Person or Entity)
16698-1000

Within twenty (20) days after service of this subpoena, you are
ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL EMPLOYMENT/PERSONNEL RECORDS IN YOUR POSSESSION
PERTAINING TO SANDRA NEIL ARRINGTON, SS#177-52-9210 D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce
things requested by this subpoena, together with the certificate of
compliance, to the party making this request at the address listed
above. You have the right to seek in advance the reasonable cost of
preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this
subpoena within twenty (20) days after its service, the party serving
this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE
STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
: :
: Plaintiff, :
: :
: v. :
: :
DALE EUGENE SHAW, :
: :
: Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Prerequisite to Service of Subpoenas for Production of Documents and Things Directed to: Clearfield Hospital, Dr. Amato B. Lugue, Presquile Family Medicine, Metro Health Center, Dr. John A. Fabre, Tri-state Pain Institute, Team Physicians of Ohio, Industrial and Sports Medicine Center, Pennsylvania State Department of Corrections/State Correctional Institution at Houtzdale, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 3rd day of February, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I. D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

(9)

SANDRA ARRINGTON, : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. :
: CIVIL ACTION - LAW
DALE EUGENE SHAW, :
Defendant : No. 00-21-C.D.

NOTICE OF SERVICE OF INTERROGATORIES
DIRECTED TO DEFENDANT

I hereby certify that on this 9th day of March, 2000, the original INTERROGATORIES DIRECTED TO DEFENDANT and one (1) copy, and one (1) copy of NOTICE OF SERVICE OF INTERROGATORIES were mailed by First Class Mail, postage prepaid, to counsel for Defendant at the following address:

McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC.
Attn: James M. Horne, Esquire
811 University Drive
State College, Pennsylvania 16801

EDGAR SNYDER & ASSOCIATES, LLC

By 
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

FILED

MAR 13 2000
11:25pm
William A. Shaw
Prothonotary
EKG

SANDRA ARRINGTON, : IN THE COURT OF COMMON PLEAS
Plaintiff : OF CLEARFIELD COUNTY,
: PENNSYLVANIA
: :
v. : :
: CIVIL ACTION - LAW
: :
DALE EUGENE SHAW, : :
Defendant : No. 00-21-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Answers To Defendant's Interrogatories (Set One), were served on all Counsel of Record listed below, by First Class Mail, postage paid, on this 5th day of April, 2000:

James M. Horne, Esquire
McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC.
811 University Drive
State College, Pennsylvania 16801

EDGAR SNYDER & ASSOCIATES, LLC

By: Kevin C. Jennings
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

FILED

APR 07 2000

William A. Shaw
Prothonotary

SANDRA ARRINGTON,
Plaintiff : IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
v.
DALE EUGENE SHAW,
Defendant : CIVIL ACTION - LAW
No. 00-21-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Responses To Request For Production Of Documents (Set One), were served on all Counsel of Record listed below, by First Class Mail, postage paid, on this 5th day of April, 2000:

James M. Horne, Esquire
McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC.
811 University Drive
State College, Pennsylvania 16801

EDGAR SNYDER & ASSOCIATES, LLC

By: Kevin C. Jennings
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

FILED

APR 07 2000

William A. Shaw
Prothonotary

SANDRA ARRINGTON,
Plaintiff
v.
DALE EUGENE SHAW,
Defendant : IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION - LAW
No. 00-21-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Responses To Request For Production Of Documents And Tangible Things by Defendant Directed To Plaintiff (Set Two), were served on all Counsel of Record listed below, by First Class Mail, postage paid, on this 5th day of April, 2000:

James M. Horne, Esquire
McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC.
811 University Drive
State College, Pennsylvania 16801

EDGAR SNYDER & ASSOCIATES, LLC

By: Kevin C. Jennings
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

FILED

APR 07 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

: No. 00-21-C.D.

Plaintiff,

: TYPE OF PLEADING:
CERTIFICATE OF SERVICE

v.

DALE EUGENE SHAW,

: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
DEFENDANT

Defendant.

: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: CHENA L. GLENN-HART, ESQ.
: I.D. NO. 82750
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

APR 10 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
: Plaintiff, :
: v. :
DALE EUGENE SHAW, :
: Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answers to Plaintiff's Interrogatories (first set), in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 7th day of April, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 452-0549

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: Chena L. Glenn-Hart
James M. Horne, Esquire
I. D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

APR 10 2000
M 8:44 AM
William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

:
:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:
:
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: CHENA L. GLENN-HART, ESQ.
: I.D. NO. 82750
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

APR 19 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
:
Plaintiff, :
:
v. :
:
DALE EUGENE SHAW, :
:
Defendant. :
:

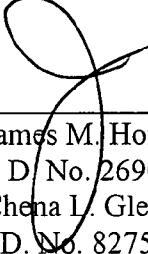
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Deposition of Plaintiff, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 17~~18~~ day of April, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 836-9575

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I. D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

NOTICE OF DEPOSITION

To: Dale Eugene Shaw
c/o James M. Horne, Esquire
McQUAIDE BLASKO
811 University Drive
Harrisburg, Pennsylvania 17110

PLEASE TAKE NOTICE that the Plaintiff, Sandra Arrington, by her Attorneys, EDGAR SNYDER & ASSOCIATES, LLC, and Kevin C. Jennings, Esquire, will take the deposition of Dale Eugene Shaw, pursuant to Rule 4007, et seq., of the Pennsylvania Rules of Civil Procedure, as amended, before a court reporter duly authorized to administer oaths, on Wednesday, June 7, 2000, at 10:00 a.m., at the offices of Sargent's Court Reporting, 106 North 2nd Street, First Floor, First Suite, Clearfield, Pennsylvania 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

EDGAR SNYDER & ASSOCIATES, LLC

By Kevin C. Jennings
Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served upon all Counsel appearing of record by First-Class, United States Mail, on April 19, 2000.

Kevin C. Jennings, Esquire

FILED

APR 24 2000

William A. Shaw
Prothonotary

c: Sargent's Court Reporting

John
FILED NO
APR 11 105 AM
2000 cc
John A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

: TYPE OF PLEADING:
CERTIFICATE OF SERVICE

: TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

: COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
CHENA L. GLENN-HART, ESQ.
I.D. NO. 82750
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

JUL 25 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :

v. :

DALE EUGENE SHAW, :

Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Documents/Things directed to Hamot Family Medical Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 24th day of July, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 836-9575

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I. D. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

: TYPE OF PLEADING:

: **Prerequisite to Service of Subpoena**

: TYPE OF CASE: CIVIL

: FILED ON BEHALF OF:

: **DEFENDANT**

: COUNSEL OF RECORD FOR

: FOR THIS PARTY:

: JAMES M. HORNE, ESQ.

: I.D. NO. 26908

: CHENA L. GLENN-HART, ESQ.

: I.D. NO. 82750

: McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

: 811 University Drive

: State College, PA 16801

: PH# (814) 238-4926

: FAX#(814) 238-9624

FILED

JUL 31 2000

**William A. Shaw
Prothonotary**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :
:

v. :
:

DALE EUGENE SHAW, :
:

Defendant. :
:

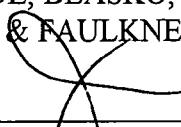
PREREQUISITE TO SERVICE OF SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for documents and things pursuant to Rule 4009.22., Defendant certifies that:

- 1) a notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena was sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- 3) the subpoena which will be served are identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: 7-28-00

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :
:

v. :
:

DALE EUGENE SHAW, :
:

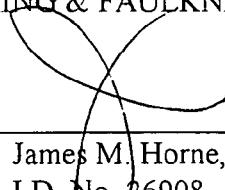
Defendant. :
:

**NOTICE OF INTENT TO SERVE SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY**

Defendant intends to serve a subpoena identical to the subpoena that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: July 24, 2000 By: _____


James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: HAMOT FAMILY MEDICAL CENTER

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING
TO SANDRA NEIL ARRINGTON, SS#177-52-9210, D/O/B 3/3/65

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE

STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:



William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.
:
Plaintiff, :
:
v. :
:
DALE EUGENE SHAW, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Prerequisite to Service of Subpoena for Documents/Things directed to Hamot Family Medical Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 28th day of July, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 836-9575

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I. D. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

: No. 00-21-C.D.

Plaintiff,

: TYPE OF PLEADING:
Certificate of Service

v.

DALE EUGENE SHAW,

: TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

Defendant.

: COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
CHENA L. GLENN-HART, ESQ.
I.D. NO. 82750
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

AUG 16 2000
M 1 10:30 AM
William A. Shaw
Prothonotary

No. 91
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HES

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

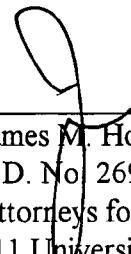
SANDRA ARRINGTON, : No. 00-21-C.D.
:
Plaintiff, :
:
v. :
:
DALE EUGENE SHAW, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Documents/Things directed to Hamot Medical Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 15th day of August, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 836-9575

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I. D. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON,

Plaintiff,

v.

DALE EUGENE SHAW,

Defendant.

: No. 00-21-C.D.

: TYPE OF PLEADING:

: **Certificate Prerequisite to Service
of Subpoena**

: TYPE OF CASE: CIVIL

: FILED ON BEHALF OF:

: **DEFENDANT**

: COUNSEL OF RECORD FOR
FOR THIS PARTY:

: JAMES M. HORNE, ESQ.

: I.D. NO. 26908

: CHENA L. GLENN-HART, ESQ.

: I.D. NO. 82750

: McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

: 811 University Drive

: State College, PA 16801

: PH# (814) 238-4926

: FAX#(814) 238-9624

FILED

SEP 07 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :

v. :

DALE EUGENE SHAW, :

Defendant. :

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- 3) no objection to the subpoena has been received, and
- 4) the subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 9/6/00

MCQUAID, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :

v. :

DALE EUGENE SHAW, :

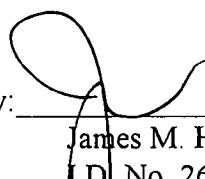
Defendant. :

**NOTICE OF INTENT TO SERVE SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY**

Defendant intends to serve a subpoena identical to the subpoena that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: August 15, 2000

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SANDRA ARRINGTON

Plaintiff(s)

vs.

No. 00-21-CD

DALE EUGENE SHAW

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22

TO: HAMOT MEDICAL CENTER

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

A TRUE AND CORRECT COPY OF ANY AND ALL MEDICAL RECORDS IN YOUR POSSESSION PERTAINING TO
SANDRA NEIL ARRINGTON, SS#177-52-9210. D/O/B 3/3/65 TO JAMES M. HORNE, ESQUIRE, MCQUAIDE
BLASKO LAW OFFICES, 811 UNIVER_(Address)SITY DRIVE, STATE COLLEGE, PA 16801

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: JAMES M. HORNE

ADDRESS: 811 UNIVERSITY DRIVE

STATE COLLEGE PA 16801

TELEPHONE: (814) 238-4926

SUPREME COURT ID # 26908

ATTORNEY FOR: DEFENDANT

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: January 24, 2000

Seal of the Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

SANDRA ARRINGTON, : No. 00-21-C.D.

Plaintiff, :

v. :

DALE EUGENE SHAW, :

Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoena for documents/things directed to Hamot Medical Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 6th day of September, 2000, to the attorney of record:

Kevin C. Jennings, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
1600 Peninsula Drive, Suite F
Erie, PA 16505-4261
(814) 836-9575

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____

James M. Horne, Esquire
I.D. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

814
SANDRA ARRINGTON,
Plaintiff

26
v.
DALE EUGENE SHAW,
Defendant

: IN THE COURT OF COMMON PLEAS
: OF CLEARFIELD COUNTY,
: PENNSYLVANIA
:
: CIVIL ACTION - LAW
:
: No. 00-21-C.D.

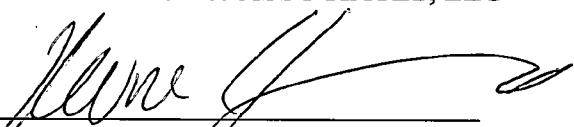
PRAECIPE TO SETTLE AND DISCONTINUE

To: Clearfield County, Prothonotary

Please satisfy, settle and discontinue the within matter.

EDGAR SNYDER & ASSOCIATES, LLC

By


Kevin C. Jennings, Esquire
Attorney for Plaintiff, Sandra Arrington

FILED

DEC 21 2000

William A. Shaw
Prothonotary

8 13

FILED NO
13-5624
DEC 21 2000 Cert. of Disc.
William A. Shaw to Atty
Prothonotary
Copy to CL
KHD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

COPY

Sandra Arrington
Plaintiff(s)

Vs.

No. 00-21-CD

Dale Eugene Shaw
Defendant(s)

CERTIFICATE OF DISCONTINUATION

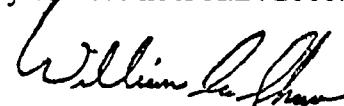
Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was this day, the 21st of December A.D. 2000, marked:

Satisfy, settle and discontinue

Record costs in the sum of \$118.73 have been paid in full by Attorney.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 21st day of December A.D. 2000.



Prothonotary