

00-446-CD
JOANNE M. BRUBAKER et al -vs- AIMEE LEIGH SHAFFER

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No.

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER, Plaintiffs

-vs-

AIMEE LEIGH SHAFFER, Defendant

C O M P L A I N T

FILED

*Rec'd
Apr 14 2000
10:35 AM
P.M.
30-206*

*APR 14 2000
10:35 AM
P.M.
30-206*

William A. Shaw

Prothonotary

One D Case to file

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 846
CLEARFIELD, PA. 16830

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

⑥¹)
JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
Plaintiffs

vs.

⑥¹)
AIMEE LEIGH SHAFFER,
Defendant

: No. 00-446 -CD
: Type of Case: Civil
: Type of Pleading: Complaint

: Filed on behalf of:
: Plaintiffs

: Counsel of Record for this Party:
: Laurance B. Seaman, Esquire

: Supreme Court No.: 19620

: GATES & SEAMAN
: Attorneys at law
: Two North Front Street
: P. O. Box 846
: Clearfield, Pennsylvania 16830
: (814) 765-1766

FILED

APR 14 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00- -CD
: :
-vs- : :
: :
AIMEE LEIGH SHAFFER, Defendant : :

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 A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR
Clearfield County Court House
Clearfield, PA 16830
(814) 765-2641, Ext. 1303

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00- -CD
: :
: -vs- :
: :
AIMEE LEIGH SHAFFER, Defendant :
:

COMPLAINT

NOW COME, Plaintiffs, JOANNE M. BRUBAKER and LARRY W. BRUBAKER, by and through their attorneys, Gates & Seaman, and Laurance B. Seaman, Esquire, and set forth the following:

1. Plaintiffs, Joanne M. Brubaker and Larry W. Brubaker, are individuals, residing at Lincoln Street, Temple Heights, Curwensville, Clearfield County, Pennsylvania 16833, and at all times relevant hereto were husband and wife.

2. Defendant, Aimee Leigh Shaffer, is an individual, residing at or who, at the time of the accident described herein resided at, 621 Bigler Avenue, Clearfield, Clearfield County, Pennsylvania 16830.

3. On or about February 15, 1999, Plaintiffs were the owners of a 1998 Subaru Legacy which was involved in the accident described herein.

4. On the aforesaid date, Defendant was the operator of a 1995 Plymouth Neon owned by her parents, Debra J. and Emory Shaffer, which was involved in the accident described herein.

5. On the aforesaid date, at approximately 5:44 p.m., Plaintiff, Joanne M. Brubaker, was operating said 1998 Subaru in an easterly direction on Nichols Street in Clearfield Borough,

Clearfield County, Pennsylvania, when Defendant, while operating said 1995 Plymouth in a southerly direction on Williams Street, failed to stop for a lawfully posted stop sign controlling her direction of travel and proceed through the intersection with Nichols Street into the path of the vehicle operated by Plaintiff, Joanne M. Brubaker.

6. At the time of the accident herein described, Plaintiff, Joanne M. Brubaker, observed the vehicle being operated by Defendant and noticed that it was failing to stop at the stop sign and so Plaintiff, Joanne M. Brubaker, applied her brakes but was unable to avoid the collision with the vehicle operated by Defendant as it crossed in front of her.

7. At the time of the accident herein described, Plaintiff, Joanne M. Brubaker, was lawfully operating her vehicle.

8. The accident was directly and proximately caused by the negligence, recklessness and carelessness of Defendant, which consisted, among other things, of the following:

a. operating said motor vehicle in a careless, reckless and negligent manner;

b. operating said motor vehicle at an excessive rate of speed under the circumstances;

c. operating said motor vehicle with no warning of approach or intended direction;

d. not having said motor vehicle under the proper control

so as to be able to stop said vehicle within the assured clear distance ahead;

e. operating said motor vehicle without due regard to the rights, safety and position of the Plaintiff, Joanne M. Brubaker;

f. failing to have said motor vehicle under the proper control so as to be able to prevent said vehicle from running through said stop sign into the path of the vehicle operated by Plaintiff, Joanne M. Brubaker;

g. failing to keep a proper lookout;

h. failing to use due care under the circumstances;

i. failing to notice the motor vehicle of Plaintiff, Joanne M. Brubaker;

j. upon noticing the motor vehicle of the Plaintiff, Joanne M. Brubaker, failing to yield the right-of-way to the vehicle operated by Plaintiff, Joanne M. Brubaker;

k. failing to obey the posted stop sign and properly stop before proceeding into the intersection directly into the path of the vehicle operated by Plaintiff, Joanne M. Brubaker;

l. failing take evasive action in order to avoid the impact with the vehicle operated by Plaintiff, Joanne M. Brubaker;

m. failing to apply her brakes in sufficient time to avoid causing the collision with the vehicle operated by Plaintiff, Joanne M. Brubaker;

n. operating said motor vehicle in disregard of the rules of the road, the ordinances of Clearfield Borough and the laws of the Commonwealth of Pennsylvania.

9. At all times material hereto, Plaintiff, Joanne M. Brubaker, acted with due care and was not contributorily nor comparatively negligent.

COUNT I
PLAINTIFF, JOANNE M. BRUBAKER, v.
DEFENDANT, AIMEE LEIGH SHAFFER

10. Plaintiff, Joanne M. Brubaker, incorporates herein by reference Paragraphs 1 through 9 of this Complaint.

11. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, sustained severe injuries and aggravated pre-existing injuries, some or all of which may be permanent, including, but not limited to, injuries to her neck, back, left leg and left foot.

12. As a result of the Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, has suffered, and will continue to suffer, great bodily pain and suffering, as well as mental anxiety, depression and nervousness, to her great detriment and loss.

13. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, has sustained serious and permanent injury, for the treatment of which she has incurred medical bills and expenses in excess of \$2,700.00 and will probably incur additional medical bills and

expenses for treatment in the future.

14. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, has suffered a loss of earnings and/or earning capacity.

15. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

16. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Joanne M. Brubaker, has been unable to attend to her normal household work, some of which has been performed by family members and some of which has been done by persons she has had to pay to perform the same.

WHEREFORE, Plaintiff, Joanne M. Brubaker, demands judgment against Defendant, Aimee Leigh Shaffer, in an amount in excess of \$25,000.00, plus costs and interest.

COUNT II
PLAINTIFF, LARRY W. BRUBAKER, v.
DEFENDANT, AIMEE LEIGH SHAFFER

17. Plaintiff, Larry W. Brubaker, incorporates herein by reference Paragraphs 1 through 16 of this Complaint.

18. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Larry W. Brubaker, has been deprived of the society, companionship, contributions and consortium of his wife, Plaintiff, Joanne M. Brubaker, to his great detriment and loss.

19. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Larry W. Brubaker, has incurred and will in the future incur large medical bills and expenses to treat his wife's injuries.

20. As a result of Defendant's carelessness, recklessness and negligence, Plaintiff, Larry W. Brubaker, has suffered a disruption in his daily habits and pursuits and a loss of enjoyment of life.

WHEREFORE, Plaintiff, Larry W. Brubaker, demands judgment against Defendant, Aimee Leigh Shaffer, in an amount in excess of \$25,000.00, plus costs.

GATES & SEAMAN
By:

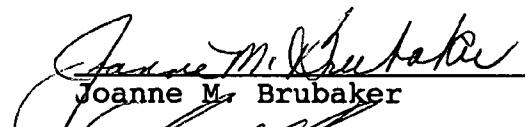
Laurance B. Seaman, Esquire
Attorney for Plaintiffs,
Joanne M. Brubaker and
Larry W. Brubaker

Two North Front Street
P. O. Box 846
Clearfield, PA 16830
(814) 765-1766

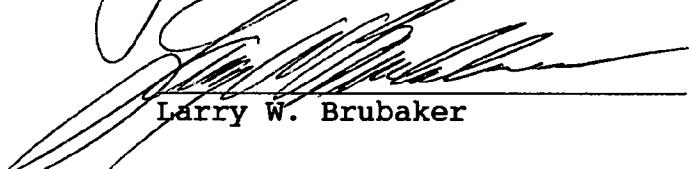
Dated: April 14, 2000

VERIFICATION

The undersigned verify that they are the Plaintiffs in the within action, and that the statements made in the foregoing Complaint are true and correct to the best of their knowledge, information and belief. The undersigned understand that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.



Joanne M. Brubaker



Larry W. Brubaker

DATE: April 14, 2000

LAURANCE B. SEAMAN

(2)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BRUBAKER, JOANN M. & LARRY W.
VS
SHAFFER, AIMEE LEIGH

00-446-CD

COMPLAINT

SHERIFF RETURNS

NOW MAY 4, 2000 AT 3:38 PM DST SERVED THE WITHIN COMPLAINT
ON AIMEE LEIGH SHAFFER, DEFENDANT AT RESIDENCE 621 BIGLER
AVE., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING
TO DEBRA SHAFFER, MOTHER A TRUE AND ATTESTED COPY OF THE
ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS
THEREOF.

SERVED BY: COUDRIET

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

SWORN TO BEFORE ME THIS

8th DAY OF May 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
by Marilyn Hamps

CHESTER A. HAWKINS
SHERIFF

FILED

MAY 08 2000
011:50
William A. Shaw
Prothonotary *WES*

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

JOANN M. BRUBAKER and LARRY W.
BRUBAKER,

Plaintiffs

vs.

No. 2000-446 CD

AIMEE LEIGH SHAFFER,

Defendant

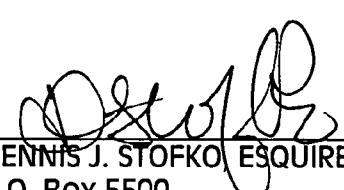
ENTRY OF APPEARANCE

Please enter my appearance for Defendant in the above matter. Papers
may be served at the address listed below.

DEMAND FOR JURY TRIAL

Pursuant to Rule 1007.1 of the Pennsylvania Rules of Civil Procedure, as
amended, a Jury Trial is demanded on all issues raised by the pleadings in this
action.

I certify this Entry of Appearance and Demand for Jury Trial shall be served
forthwith by ordinary mail upon all parties.


DENNIS J. STOKO, ESQUIRE
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID 27638

FILED

MAY 19 2000

William A. Shaw
Prothonotary

FILED

MAY 19 1979
WILLIAM A. SHAN
Prothonotary
FCC

(4)

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

JOANN M. BRUBAKER and LARRY W.
BRUBAKER,

Plaintiffs

vs.

No. 2000-446 CD

AIMEE LEIGH SHAFFER,

ANSWER AND NEW MATTER

Defendant

Counsel of record for this party:
Dennis J. Stofko, Esquire
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID 27638

TO THE PARTIES:

You are hereby notified to reply to the
enclosed New Matter within 20 days of
service hereof or a default judgment may
be entered against you.

FILED

MAY 26 2000

William A. Shaw
Prothonotary

ANSWER AND NEW MATTER

NOW COMES the Defendant by and through counsel, Dennis J. Stofko, and files the following Answer and New Matter.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.
6. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.
7. Denied. Paragraph 7 contains a conclusion of law to which no responsive pleading is required.
8. Denied. Paragraph 8 contains a conclusion of law to which no responsive pleading is required.
9. Denied. Paragraph 9 contains a conclusion of law to which no responsive pleading is required.
10. Denied. See previous Answers.
11. Denied. After reasonable investigation Defendant is without sufficient

knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

12. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

13. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

14. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

15. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

16. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

WHEREFORE, Defendant requests Plaintiffs' Complaint be dismissed.

17. Denied. See previous Answers.

18. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and

proof thereof is required at the time of trial.

19. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

20. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

WHEREFORE, Defendant requests Plaintiffs' Complaint be dismissed.

NEW MATTER

21. The Defendant is informed, believes and therefore avers that the Plaintiff is contributorily negligent and/or comparatively negligent and Plaintiff is thus barred from recovery of any damages under the terms of the Pennsylvania Comparative Negligence Act. Act No. July 9, 1976 Pl. 855 No. 152 and the Act of April 28, 1978, Pl. 202 No. 53 Section 10 (89), 42 Pa. CSA Section 7102A, effective as to the causes of action arising on or after February 15, 1999 as the Plaintiff's causal negligence is greater than the negligence, if any, of the Defendant.

22. In the alternative pursuant to the aforesaid provisions of the Pennsylvania Comparative Negligence Act, 42 Pa. CSA Section 7102A any damage which the Plaintiff may have legally suffered and can prove at trial and which are not otherwise barred by any of the defenses asserted in this Answer and New Matter should be diminished in proportion to the amount of negligence

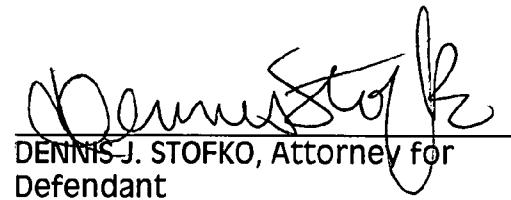
attributed to the Plaintiff.

23. The accident described in Plaintiff's complaint occurred on February 15, 1999 which date was subsequent to the effective date of the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. CSA Chapter 17.

24. The Defendant pleads the said Motor Vehicle Financial Responsibility Law as a defense to the extent that said law limits and controls Plaintiff's right to recover damages in this action.

25. The Defendants further raise the defense of sudden emergency as a complete defense to plaintiffs' claim.

WHEREFORE, Defendant requests judgment on her behalf.



DENNIS J. STOKO, Attorney for
Defendant

I, Aimee Leigh Shaffer do hereby swear or affirm that the facts set forth in the Answer and New Matter are correct to the best of my knowledge, information and belief.

I understand that these averments of fact are made subject to the penalties of 18 Pa. CSA 4904 relating to unsworn falsification to authorities.

Aimee L. Shaffer
Aimee Leigh Shaffer

Dated: 5-20-00

IN THE COURT OF COMMON
PLEAS OF CLEARFIELD COUNTY, PA
No. 00-446-CD
CIVIL ACTION - LAW
JURY TRIAL DEMANDED

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
Plaintiffs

-vs-

AIMEE LEIGH SHAFFER,
Defendant

PLAINTIFFS' REPLY TO
NEW MATTER OF
DEFENDANT

FILED

JUN 07 2000

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William A. Shaw
Prothonotary

REB

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 846
CLEARFIELD, PA. 16830

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

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
Plaintiffs

vs.

**AIMEE LEIGH SHAFFER,
Defendant**

No. 00-446-CD
JURY TRIAL DEMANDED
Type of Case: Civil

Type of Pleading: PLAINTIFFS'
REPLY TO NEW MATTER OF DEFENDANT

Filed on behalf of:
Plaintiffs

Counsel of Record for this Party:
Laurance B. Seaman, Esquire

Supreme Court No.: 19620

GATES & SEAMAN
Attorneys at law
Two North Front Street
P. O. Box 846
Clearfield, Pennsylvania 16830
(814) 765-1766

FILED

JUN 07 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
-vs- : JURY TRIAL DEMANDED
AIMEE LEIGH SHAFFER, Defendant :

PLAINTIFFS' REPLY TO NEW MATTER OF DEFENDANT

AND NOW, come JOANNE M. BRUBAKER and LARRY W. BRUBAKER, by and through their undersigned counsel, and hereby respond to the New Matter as follows:

21. Denied. Paragraph 21 constitutes a conclusion of law to which no responsive pleading is required.

22. Denied. Paragraph 22 constitutes a conclusion of law to which no responsive pleading is required.

23. Denied. Paragraph 23 constitutes a conclusion of law to which no responsive pleading is required.

24. Denied. Paragraph 24 constitutes a conclusion of law to which no responsive pleading is required.

25. Denied. Paragraph 25 constitutes a conclusion of law to which no responsive pleading is required.

WHEREFORE, Plaintiffs, Joanne M. Brubaker and Larry W. Brubaker, demand judgment against Defendant, Aimee Leigh Shaffer, each in an amount in excess of \$25,000.00, plus costs.

Respectfully submitted,

GATES & SEAMAN
By: 

Laurence B. Seaman, Esquire
Attorney for Plaintiffs,
Joanne M. Brubaker and
Larry W. Brubaker

Date: 6/7/00

Two North Front Street
Clearfield, PA 16830
(814) 765-1766

VERIFICATION

The undersigned verify that they are the Plaintiffs in the within action, and that the statements made in the foregoing Reply are true and correct to the best of their knowledge, information and belief. The undersigned understand that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Joanne M. Brubaker

Joanne M. Brubaker

Larry W. Brubaker

Larry W. Brubaker

DATE: June 06, 2000

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that service was made upon the
Defendant by mailing a true and correct copy of Plaintiffs'
Reply to New Matter of Defendant to counsel for Defendant on
June 7, 2000 by regular U. S. Mail, postage prepaid to:

Dennis J. Stofko, Esquire
R. THOMAS STRAYER LAW OFFICES
969 Eisenhower Boulevard, Suite E
P. O. Box 5500
Johnstown, PA 15904

GATES & SEAMAN

BY: _____
Laurance B. Seaman, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA
No. 00-446-CD

BRUBAKER ET AL VS.
SHAFFER

ANSWERS TO INTERROGATORIES
DIRECTED BY DEFENDANT

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 846
CLEARFIELD, PA. 16830

THE PLUNKENHORN CO., WILLIAMSPORT, PA.

FILED
JUL 21 2000
William A. Shaw
Prothonotary
NOCC

REG

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

: No. 00-446-CD
: Type of Case: Civil
: Type of Pleading: Answers to
: Interrogatories Directed to
: Plaintiffs
: Filed on behalf of:
: Plaintiffs
: Counsel of Record for this Party:
: Laurance B. Seaman, Esquire
: Supreme Court No.: 19620
: GATES & SEAMAN
: Attorneys at law
: Two North Front Street
: P. O. Box 846
: Clearfield, Pennsylvania 16830
: (814) 765-1766

AIMEE LEIGH SHAFFER,
Defendant

FILED

JUL 21 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

ANSWERS TO INTERROGATORIES

1. (a) Joanne Marie Brubaker
(b) 63
(c) Somerset County
(d) Lincoln Avenue, Curwensville, PA 16833
(e) Same
(f) None
(g) 200-28-7690
2. 28 years
3. Married to Larry Wayne Brubaker
Lincoln Avenue, Curwensville, PA 16833
Married at time of accident
Married September 2, 1956 - Somerset county
4. (a) Independent contractor
(b) Research information at County Courthouses
(c) Superior Information Services, Trenton, NJ
Stephanie Hoover, P. O. Box 4215, Harrisburg, PA 17111
(d) 4 years
(e) \$10.00 per hour plus \$.25 per mile. Also hourly wage
for travel time
(f) None
5. Independent Contractor
(a) Superior Information Services, Trenton, NJ
(b) Stephanie Hoover, P. O. Box 4215, Harrisburg, PA 17111
(c) Superior Information Services, Trenton, NJ
(d) N/A
6. High School Graduate
Trained for my work by Supervisor at the time, Jennifer

Hendricks

7. Filed jointly each year for past 5 years; Philadelphia, PA
 - (a) No claim will be pursued for wage loss as a result of this accident
8. Non-employee compensation for Joanne M. Brubaker only
 - 1998 \$2,695.90
 - 1999 \$2,433.01
 - 2000 \$2,230.18

No claim will be pursued for wage loss as a result of this accident
9. No claim will be pursued for wage loss as a result of this accident

Research information at County Courthouses since 1995

10. Yes
 - (a) (i) approximately 1979-81 - Curwensville, PA
(ii) 10/22/97 - DuBois, PA
(iii) 1/13/98 -
 - (b) (i) work-related injury
(ii) vehicular
(iii) vehicular
 - (c) (i) sprained back while lifting - fully recovered
(ii) whiplash, back, left leg, left foot
(iii) minor bumps to lower extremities - fully recovered
 - (d) back injured and aggravated prior injuries
11. (a) Initially unable to work until 1/16/98. Thereafter, worked sporadically as able.
- (b) No claim will be pursued for wage loss as a result of this accident
- (c) No
- (d) Initially unable to work until 1/16/98. Thereafter, worked sporadically as able
- (e) No other employment sought
- (f) No claim will be pursued for wage loss as a result of this accident

(g) No claim will be pursued for wage loss as a result of this accident

12. (a) aggravated the back, neck and leg injury that I already had from accident of 10-22-97
(b) None
(c) still suffering from all other injuries, which may be permanent and disabling
(d) still suffering from all other injuries, which may be permanent and disabling

13. No

14. (a) N/A
(b) see medical records

15. (a) No
(b) 10-22-97 to 1-16-98, thereafter worked sporadically as able
(c) N/A
(d) Rest and stay off feet as much as possible; unknown

16. (a) i. Dr. Richard Schamp, Agape Family Health Center, PC
216 Liberty Boulevard, DuBois, PA 15801
ii. Dr. Martin Schaeffer
145 Hospital Avenue, DuBois, PA 15801
iii. Dr. Anne Matthews
145 Hospital Avenue, DuBois, PA 15801
iv. Dr. Jagadeesha Shetty
145 Hospital Avenue, DuBois, PA 15801
v. Dr. Stanley Lang
Medical Arts Bldg, 145 Hospital Avenue
DuBois, PA 15801
vi. Dr. Mark Piasio
90 Beaver Drive, DuBois, PA 15801
vii. Dr. Jeffrey A. Baum
200 Delafield Road, Suite 1040, Pittsburgh, PA
15215-3205
(b) See medical records
(c) Dr. Stanley Lang and Dr. Martin Schaeffer
(d) Dr. Lang - high blood pressure, diabetes
Dr. Schaeffer - for the injuries from accidents
(e) See medical records
(f) Will be supplied upon receipt of the same
(g) See medical records
(h) Will be supplied upon receipt of the same

17. i. Cornerstone Physical Therapy
385 Maplevale Road, Brookville, PA 15825
Information will be supplied when received

ii. Clearfield Hospital Therapy Department
809 Turnpike Avenue, Clearfield, PA 16830
Information will be supplied when received

iii. Penn Central Physical Therapy, Inc.
504 Park Avenue, Clearfield, PA 16830
Information will be supplied when received

18. (i) Three (3) pair running shoes (prescribed by Dr. Lang)
approximately \$145.00; \$135.98; and approx. \$135.00
One (1) pair Lareal Flare outs - \$30.00
Travel to and from Bellefonte, PA to Campanis
Orthopedic (shoes)
109 miles round-trip - 4-6-98; 5-5-98; 6-9-98; 7-1-98

(ii) Cleaning through 6-28-00
Malia Uhrin, 909 Richard Street, Clearfield, PA 16830
- \$2,202.50

(iii) Cleaning -
Janet Walters, Clearfield, PA 16830 - \$210.00

(iv) Cleaning -
Brenda Wilt, R. D., Curwensville, PA 16833 - \$347.00

(v) Clearfield American Homepatient - Lumbar cushion -
\$17.20
23 N. Second Street, Clearfield, PA 16830

19. Yes

(a) Superior Products, Curwensville, PA 16833
Early 1980's - back sprain - 2-3 months

20. Police Accident Report

(a) Laurance B. Seaman, Esquire

(b) Copy provided

21. No

22. None

23. No

24. N/A

25. See Police Accident Report

26. No

27. (a) 2 - a 1998 Subaru Legacy - green;
and a 1995 Plymouth Neon

(b) Subaru - East on Nichols Street
Plymouth - South on Williams Street

(c) Joanne M. Brubaker - Lincoln St., Curwensville, PA
16833

Aimee Leigh Shaffer - 621 Bigler Ave. Clearfield, PA
16830

(d) Ms. Shaffer failed to stop at stop sign on Williams Street and failed to yield right of way. She proceeded across Nichols Street. I attempted to stop but was unable to avoid the collision. She proceeded moving south on Williams Street crossing through hedge and coming to a stop at end of lawn at 204 Nichols Street.

(f) Coming home from having yearly post mammogram check-up at Doctor Dotsey's office on Turnpike Avenue; was going to grocery store before returning home.

28. (a) level

(b) right lane - east

(c) Objection - what is meaning of "came upon"?

When I first saw the other vehicle, I was going 20-25 mph.

(d) unable to estimate

(e) unknown, I had applied my brakes and slowed from my previous speed

(f) I still had my foot on the brake pedal

(g) yes

(h) yes

29. In ambulance

30. No

31. Driving east on Nichols Street

32. Yes

33. See Police Accident Report

34. When I asked for her insurance info, she refused and said she had to call her mother.

35. Yes

(a) 09-029-059

(b) Since 1952

(c) Corrective lenses

(d) No

36. No

37. Will be supplied

- 38. One
- 39. Q11-1404214 N - Erie Insurance
- 40. Yes
- 41. 1998 Subaru Legacy - Larry and Joanne Brubaker
- 42. Full Tort
- 43. Full Tort
- 44. Copy provided

GATES & SEAMAN
By: 

Laurence B. Seaman, Esquire
Attorney for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA
POLICE ACCIDENT REPORT



(XX) REFER TO OVERLAY SHEETS

REPORTABLE NON-REPORTABLE

PENNDOT USE ONLY

POLICE INFORMATION				ACCIDENT LOCATION								
1. INCIDENT NUMBER	99-8			20. COUNTY	Clearfield CODE 17							
2. AGENCY NAME	Clearfield Borough Police Dept.			21. MUNICIPALITY	Clearfield Boro CODE 404							
3. STATION/ PRECINCT	14 S. Front St., Clearfield Borough			22. ROUTE NO. OR STREET NAME	Williams Street							
4. PATROL ZONE				23. SPEED LIMIT	25	(24) TYPE HIGHWAY	1					
5. INVESTIGATOR	Sgt. Jim Zelenky BADGE NUMBER 3			(25) ACCESS CONTROL	1							
6. APPROVED BY	JC Zelenky, Chief BADGE NUMBER 1			PRINCIPAL ROADWAY INFORMATION								
7. INVESTIGATION DATE	2-15-99	8. ARRIVAL TIME	1748 hrs.	INTERSECTING ROAD: 26. ROUTE NO. OR STREET NAME Nichols Street								
ACCIDENT INFORMATION				27. SPEED LIMIT	25	(28) TYPE HIGHWAY	0					
9. ACCIDENT DATE	2-15-99	10. DAY OF WEEK	Monday	(29) ACCESS CONTROL	1							
11. TIME OF DAY	1744 hrs.	12. NUMBER OF UNITS	2	IF NOT AT INTERSECTION:								
13. # KILLED	0	14. # INJURED	1	30. CROSS STREET OR SEGMENT MARKER								
16. DID VEHICLE HAVE TO BE REMOVED FROM THE SCENE? UNIT 1 <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> X UNIT 2 <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> X				31. DIRECTION FROM SITE	N S E W	32. DISTANCE FROM SITE	FT. MI.					
17. VEHICLE DAMAGE 0 - NONE UNIT 1 <input type="checkbox"/> 2 1 - LIGHT <input type="checkbox"/> 1 2 - MODERATE <input type="checkbox"/> 1 3 - SEVERE UNIT 2 <input type="checkbox"/> 1				33. DISTANCE WAS	MEASURED <input type="checkbox"/>	ESTIMATED <input type="checkbox"/>						
18. HAZARDOUS MATERIALS <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> X				34. CONSTRUCTION ZONE	<input type="checkbox"/> 0	35. TRAFFIC CONTROL DEVICE	PRINCIPAL INTERSECTING <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 0					
UNIT # 1				UNIT # 2								
36. LEGALLY PARKED? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	37. REG. PLATE	1Y6-531	38. STATE	Pa.	36. LEGALLY PARKED? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	37. REG. PLATE	ACN-2575	38. STATE	Pa.			
39. PA TITLE OR OUT-OF-STATE VIN 51392625602				39. PA TITLE OR OUT-OF-STATE VIN	51733877801							
40. OWNER Debra J. and Emory Shaffer				40. OWNER	Joanne M and Larry W. Brubaker							
41. OWNER ADDRESS 621 Bigler Ave.				41. OWNER ADDRESS	Lincoln St., P.O. Box 175							
42. CITY, STATE & ZIPCODE Clearfield, Pa. 16830				42. CITY, STATE & ZIPCODE	Curwensville, Pa. 16833							
43. YEAR	1995	44. MAKE	Plymouth	43. YEAR	1998	44. MAKE	Subary					
45. MODEL - (NOT BODY TYPE)	Neon	46. INS.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	45. MODEL - (NOT BODY TYPE)	Legacy	46. INS.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK					
47. BODY TYPE	04	48. SPECIAL USAGE	0	47. BODY TYPE	06	48. SPECIAL USAGE	0	49. VEHICLE OWNERSHIP 1				
50. INITIAL IMPACT POINT	4	51. VEHICLE STATUS	0	50. INITIAL IMPACT POINT	12	51. VEHICLE STATUS	0	52. TRAVEL SPEED 20-25				
53. VEHICLE GRADIENT	1	54. DRIVER PRESENCE	1	53. VEHICLE GRADIENT	1	54. DRIVER PRESENCE	1	55. DRIVER CONDITION 1				
56. DRIVER NUMBER	26068738	57. STATE	Pa.	56. DRIVER NUMBER	09029059	57. STATE	Pa.					
58. DRIVER NAME	Aimee Leigh Shaffer			58. DRIVER NAME	Jo Anne Brubaker							
59. DRIVER ADDRESS	621 Bigler Ave.			59. DRIVER ADDRESS	Lincoln St., P.O. Box 175							
60. CITY, STATE & ZIPCODE	Clearfield, Pa. 16830			60. CITY, STATE & ZIPCODE	Curwensville, Pa. 16833							
61. SEX	F	62. DATE OF BIRTH	07-19-81	63. PHONE		61. SEX	F	62. DATE OF BIRTH	09-09-36	63. PHONE	(814) 236-0760	
64. COMM. VEH. Y <input type="checkbox"/> N <input checked="" type="checkbox"/> X	65. DRIVER CLASS C	64. COMM. VEH. Y <input type="checkbox"/> N <input checked="" type="checkbox"/> X	65. DRIVER CLASS C	67. CARRIER		68. CARRIER ADDRESS		69. CITY, STATE & ZIPCODE		70. USDOT #	ICC #	PUC #
72. VEH. CONFIG.	73. CARGO BODY TYPE	74. GVWR	72. VEH. CONFIG.	73. CARGO BODY TYPE	74. GVWR	75. NO. OF AXLES	76. HAZARDOUS MATERIALS	77. RELEASE OF HAZMAT Y <input type="checkbox"/> N <input type="checkbox"/> UNK	75. NO. OF AXLES	76. HAZARDOUS MATERIALS	77. RELEASE OF HAZMAT Y <input type="checkbox"/> N <input type="checkbox"/> UNK	



ERIE INSURANCE EXCHANGE
PIONEER FAMILY AUTO POLICY

CONTINUATION NOTICE

AGENT	INSURANCE PERIOD	POLICY NUMBER
AA4234 BOYLES INSURANCE, INC.	11/14/98 TO 11/14/99	Q11 1404214 N
NAME OF INSURED AND ADDRESS	NAME OF OTHER INTEREST	
LARRY W BRUBAKER & JOANNE M BRUBAKER P O BOX 29 CURWENSVILLE PA 16833-0029		

AGENT - BOYLES INSURANCE, INC.

11 NICHOLS STREET

AGENT PHONE - (814) 765-8152

CLEARFIELD PA 16830 1501

* THE SURCHARGE FOR THE 01/13/98 ACCIDENT HAS BEEN FORGIVEN
* UNDER ERIE'S FIRST ACCIDENT FORGIVENESS PLAN.

ITEM 4. AUTOS COVERED

AUTO	YR	MAKE	VIN	ST	TER	SYM	RATING	CLASS	DDP
1	86	CHEV CAMARO Z28	1G1FP87F7G7GN5233	PA	2D	R	AIAS	MULTI	
2	98	SUBA LEGACY OUT	4S3BG6856W7600786	PA	2D	G	AIAS	MULTI	

ITEM 5. INSURANCE IS PROVIDED WHERE A PREMIUM, OR INCL, IS SHOWN FOR THE COVERAGE. COVERAGE, LIMITS AND ANNUAL PREMIUMS ARE AS FOLLOWS-

#1 #2

*** GOOD DRIVER-RATES APPLY ***

LIABILITY PROTECTION	
BODILY INJURY \$250M/PERSON \$500M/ACC	65 94
PROPERTY DAMAGE \$100M/ACC	33 50
FIRST PARTY BENEFITS	
MEDICAL EXPENSE \$100M	37 44
ACCIDENTAL DEATH \$5M	4 1
UNINSURED MOTORISTS COVERAGE	
BOD INJ \$250M/PERSON \$500M/ACC-STACKED	28 26
UNDERINSURED MOTORISTS COVERAGE	
BOD INJ \$250M/PERSON \$500M/ACC-STACKED	91 91
PHYSICAL DAMAGE COVERAGES	
COMPREHENSIVE - \$100 DED	109 169
COLLISION - \$250 DED	72 207
OPTIONAL COVERAGES	
TRANSP EXPENSES - COLL \$20/DAY, \$900/LOSS	12 12
TOTAL ANNUAL PREMIUM FOR EACH AUTO	446 694
TOTAL ANNUAL POLICY PREMIUM	\$ 1,140

ITEM 6. APPLICABLE POLICY, ENDORSEMENTS, EXCEPTIONS TO DECLARATIONS ITEMS
ALL AUTOS - FAP 04/97 UF-9033 04/98*, AFPN01 10/98*, AFPA03 10/98*.
AUTO 1 - AFPU01 06/98*.
AUTO 2 - AFPU01 06/98*.

5 298

(SEE REVERSE SIDE) RETURNED CHECK FEES WILL BE ADDED TO YOUR ACCOUNT YD WFS 10/10/98

DETACH **INVOICE** AGENT - Please return this portion with your Policyholder's remittance DETACH

AGENT
AA4234 BOYLES INSURANCE, INC. Q11 1404214 N
LARRY W BRUBAKER &
JOANNE M BRUBAKER
P O BOX 29
CURWENSVILLE PA 16833-0029

DATE DUE	PAYMENT DUE
11-14-98	285.00
02-14-99	287.00*
05-14-99	287.00*
08-14-99	287.00*

PAYMENT PLAN
DENTER ANY
PAY PLAN →
CHANGE HERE

* INCLUDES \$2 SERVICE CHARGE

ERIE INSURANCE GROUP

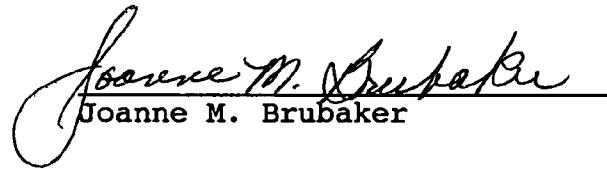
100 Erie Insurance Place • ERIE, PA 16530

PLEASE DO NOT WRITE BELOW THIS LINE ↓

-010142341114042141221400000009-002850000114600-

VERIFICATION

The undersigned verifies that she is the Plaintiff in the within action, and that the statements made in the foregoing Answers to Interrogatories are true and correct to the best of her knowledge, information and belief. The undersigned understands that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.


Joanne M. Brubaker

DATE: July 21, 2000

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

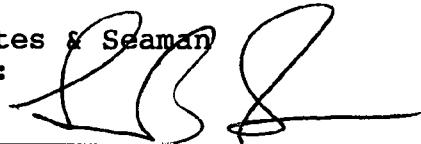
JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
: :
-vs- : :
: :
AIMEE LEIGH SHAFFER, Defendant : :

CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of July, 2000,
a true and correct copy of the Answers to Interrogatories
Addressed to Plaintiffs was sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By:



Laurance B. Seaman, Esquire
Attorney for Plaintiffs

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

No. 00-446-CD

BRUBAKER ET VIR VS.
SHAFFER

RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 846
CLEARFIELD, PA. 16830

141-103-124
JUL 21 2000

William A. Shaw
Prothonotary
DOCC

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

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
husband and wife,
Plaintiffs
vs.
AIMEE LEIGH SHAFFER,
Defendant

Plaintiff's
RESPONSE TO REQUEST FOR PRODUCTION
OF DOCUMENTS
Plaintiffs

Filed on behalf of:
Plaintiffs

Counsel of Record for this Party:
Laurance B. Seaman, Esquire

Supreme Court No.: 19620

GATES & SEAMAN
Attorneys at law
Two North Front Street
P. O. Box 846
Clearfield, Pennsylvania 16830
(814) 765-1766

FILED

JUL 21 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
: :
-vs- :
: :
AIMEE LEIGH SHAFFER, Defendant :
:

PLAINTIFFS' RESPONSE TO REQUEST FOR PRODUCTION
OF DOCUMENTS

1. Medical records furnished by Defendant to Plaintiff not included herewith. Following provided:
 - a. Prescription invoice - Curwensville Pharmacy - 10-22-97 to 4-6-98 - 3 pages;
 - b. prescription from DRMC Primary Care Associates - 4-25-00 (Shoes);
 - c. Receipt - Campanis Orthopedic - 7-1-98 - \$175.00;
 - d. Receipt - Road Runner Sports - 2-16-00 - \$135.98;
 - g. Estimate - 2-24-99 - Wilkinson Subaru - 1 page with Nationwide Insurance Co. estimate 2-22-99 - 2 pages;
 - h. Car Rental Agreement - Wilkinson Subaru - 12-27-99 - 1 page; and
 - i. Invoice - Clearfield American Homepatient - lumbar cushion - 2-18-99 - \$17.20.
2. None
3. None.

GATES & SEAMAN

By _____


Laurence B. Seaman, Esquire
Attorney for Plaintiffs

Date: 7/21/00

ME D I C A L E X P E N S E S BGN DTE: 10/26/97 END DTE: 07/31/98

FOR: BRUBAKER, JOANNE CURWENNSVILLE PHARMACY
CARE OF: KERIE INS 447 STATE STREET
P.O. BOX 29 CURWENNSVILLE, PA. 16833
BRUBJC CURWENNSVILLE, PA. 16833 PHARMACIST - JDELLANTONIC
10/30/97 06109463 NORFLEX 100MG TABL 20TAB SCHAMP 40.00 RX
NEW 00089-0221-10 10DAYS AS2279633 BRAND
11/17/97 06109463 NORFLEX 100MG TABL 20TAB SCHAMP 40.00 RX
REFILL 00089-0221-10 10DAYS AS2279633 BRAND
03/04/98 06113917 DAYPRO 600MG 30TAB M.PIASIO,MD. 38.58 RX
NEW 00025-1361-31 15DAYS EP1688962 BRAND
03/21/98 06113917 DAYPRO 600MG 30TAB M.PIASIO,MD. 38.58 RX
REFILL 00025-1361-31 15DAYS EP1688962 BRAND
04/06/98 06113917 DAYPRO 600MG 30TAB M.PIASIO,MD. 56.00 RX
REFILL 00025-1361-31 15DAYS EP1688962 BRAND

297.16 TOTAL

*Curwensville Pharmacy
447 State Street
Curwensville, PA 16833
(814) 236-1050*



M E D I C A L E X P E N S E S BGN DTE: 10/22/98 END DTE: 08/03/98

FOR: BRUBAKER, JOANNE
CARE OF:

CURWENSVILLE PHARMACY
447 STATE STREET

CURWENSVILLE, PA. 16833
PHARMACIST - JDELLANTONIO

BRUBJ BOX 29
CURWENSVILLE, PA 16833

10/27/97	06105423	Y RELAFEN 750MG	60TAB	JOHN KOVAL	14.31	COPAY
	REFILL	00029-4852-20	30DAYS	AC3125653		BRAND
10/27/97	06105425	NEURONTIN 400MG	120CAP	JOHN KOVAL	26.61	COPAY
	REFILL	00071-0806-24	30DAYS	AC3125653		BRAND
10/27/97	06103549	TENORETIC 50	60TAB	SCHAMP	12.21	COPAY
	REFILL	00310-0115-10	60DAYS	AS2279633		BRAND
12/22/97	02003937	OXYCODONE W/APAP	20TAB	SCHAMP	.93	COPAY
	NEW	60951-0602-85	10DAYS	AS2279633		GENERIC
12/22/97	06111268	O NORFLEX 100MG TABL	60TAB	SCHAMP	44.77	COPAY
	NEW	00089-0221-10	30DAYS	AS2279633		BRAND
12/22/97	06111269	TENORETIC 50	60TAB	SCHAMP	30.53	COPAY
	NEW	00310-0115-10	60DAYS	AS2279633		BRAND
01/03/98	06105423	Y RELAFEN 750MG	60TAB	JOHN KOVAL	49.62	COPAY
	REFILL	00029-4852-20	30DAYS	AC3125653		BRAND
01/03/98	06105425	NEURONTIN 400MG	120CAP	JOHN KOVAL	26.61	COPAY
	REFILL	00071-0806-24	30DAYS	AC3125653		BRAND
01/29/98	06105423	Y RELAFEN 750MG	60TAB	JOHN KOVAL	37.12	COPAY
	REFILL	00029-4852-20	30DAYS	AC3125653		BRAND
03/21/98	06111269	TENORETIC 50	60TAB	SCHAMP	31.71	COPAY
	REFILL	00310-0115-10	60DAYS	AS2279633		BRAND

274.42 TOTAL

* Anti-Inflam.
- Pain
o Muscle Relaxer

Curwensville Pharmacy
447 State Street
Curwensville, PA 16833
(814) 236-1050



M E D I C A L E X P E N S E S BGN DTE: 10/22/98 END DTE: 08/03/98

FOR: BRUBAKER, JOANNE
CARE OF: XERIE INS
P.O. BOX 29
BRUBJC CURWENSVILLE, PA 16833

CURWENSVILLE PHARMACY
447 STATE STREET
CURWENSVILLE, PA. 16833
PHARMACIST - JDELLANTONIO

10/22/97	02003896	OXYCONTIN 10MG NEW 59011-0100-10	20TAB	SCHAMP	4.34 COPAY
10/30/97	06109463	O NORFLEX 100MG TABL NEW 00089-0221-10	10DAYS	AS2279633	BRAND
11/17/97	06109463	O NORFLEX 100MG TABL REFILL 00089-0221-10	20TAB	SCHAMP	40.00 RX
03/04/98	06113917	DAYPRO 600MG NEW 00025-1381-31	10DAYS	AS2279633	BRAND
03/21/98	06113917	* DAYPRO 600MG REFILL 00025-1381-31	15DAYS	BP1888962	BRAND
04/06/98	06113917	* DAYPRO 600MG REFILL 00025-1381-31	15DAYS	BP1888962	BRAND
			30TAB	M.PIASIO, MD.	19.29 COPAY
			30TAB	M.PIASIO, MD.	19.29 COPAY
			30TAB	M.PIASIO, MD.	50.00 RX
			15DAYS	BP1888962	BRAND

172.92 TOTAL

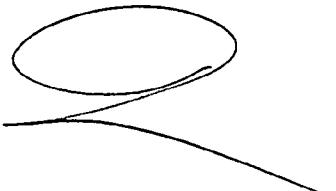
* Anti-Inflam.

O Muscle Relaxer

- Pain

Curwensville Pharmacy

447 State Street
Curwensville, PA 16833
(814) 236-1050



DRMC PRIMARY CARE ASSOCIATES
AT LIBERTY BLVD.
216 Liberty Blvd. Dubois, PA 15801 (814) 375-1222

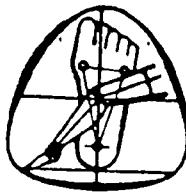
STANLEY LANG, M.D. PAUL F. DOUGHTY, D.O.
024992-E 05004516-L
ROBERT A. BARBER, D.O.
05007145-L

NAME Jeanne Dubaker DATE 4-23-00
ADDRESS _____

#	MEDICATION	NUMBER	FREQUENCY	REFILLS
1	Shoes with			
2	motion control and			
3	shock absorption			
4				
5		7		
6		10		

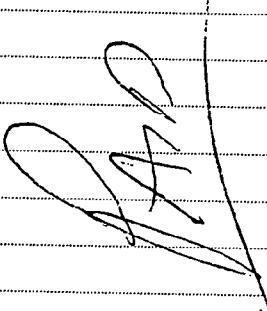
SUBSTITUTION PERMISSIBLE Yes

IN ORDER FOR A BRAND NAME PRODUCT TO BE DISPENSED, THE PRESCRIBER MUST
HANDWRITE "BRAND NECESSARY" OR "BRAND MEDICALLY NECESSARY" IN THE SPACE
BELOW.



Campanis Orthopedic

148 South Allegheny Street
Bellefonte, PA 16823
(814) 355-1806
Fax (814) 355-4424

CUSTOMER'S ORDER NO.		PHONE	DATE	7/1/98	
NAME JoAnn Burubaker					
ADDRESS P.O. Box 175 CUCWENNSVILLE, PA 16833					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT	
MDSE. RETD	PAID OUT				
QTY.	DESCRIPTION			PRICE	AMOUNT
1PR	Orthopedic SHEES				\$175 -
1PR	Lateral Flare ORTS.				\$145 -
					\$175 -
					TAX
					TOTAL

All claims and returned goods
MUST be accompanied by this bill.

1730

Thank You

WILKINSON'S SUBARU

312 South Street
CURWENSVILLE, PA 16833-1237
(814) 236-1921
FAX (814) 236-1925

NAME <i>JOANNE MARY W. BRUBAKER</i>	PHONE <i>236-0760</i>	DATE <i>3-24-99</i>
STREET <i>P.O. Box 175</i>	CITY <i>Dimmsville PA 16833</i>	
YEAR <i>98</i>	COLOR <i>Maroon/plate</i>	MAKE <i>Suzanne</i>
REGISTRATION NO. <i>AN2575</i>	SERIAL NO. <i>4B3B66856W7600786</i>	MODEL <i>Outback SW</i>
INSURANCE CO.	ODOMETER <i>15097</i>	ESTIMATE PREPARED BY <i>RICK</i>
	ADJUSTOR	

The above is an estimate based on our inspection and does not cover any additional parts or labor which may be required after the work has been started. Occasionally, worn or damaged parts are discovered which may not be evident on the first inspection. Because of this, the above prices are not guaranteed. Quotations on parts and labor are current and subject to change.

AUTHORIZATION FOR REPAIR. You are hereby authorized to make the above repairs:

SIGNED:

started. _____

DATE: _____

TOTALS	
TOTAL PARTS	\$ 249.95
TOTAL LABOR	\$ 73.60
TOTAL REFINISH	\$ 64.00
TOTAL SUBLET	\$ 50.00
TAX	\$ 26.25
	\$
TOTAL	\$ 463.80

02/22/1999 at 11:53 AM
36058

5437B 25884702159901J/B1

NATIONWIDE INSURANCE ENTERPRISE
STATE COLLEGE
PO BOX 1436
CLEARFIELD, PA 16830
(814) 768-7848x Fax: (814) 768-7858x

ESTIMATE OF RECORD

Written by: Greg Forcey #142276 02/22/1999
Adjuster: Greg Forcey (PACLM3 #

Owner: Joanne Brubaker	Claim # 5437B 25884702159901J/B1
Address: PO Box 175	Policy #
Lincoln Street	
Curwensville, PA 16833	Date of Loss: 02/15/1999 at
: (814) 236-0760x	Type of Loss: Property Damage
Day: (UNK) NOW-Nx	Point of Impact: 12. Front
Insured: Debra Joan Shaffer	: (814) 765-2512x
Address: 621 Bigler Ave	Day: (814) 765-5331x
Clearfield, PA 16830-2628	

Inspect **NON_DRIVE_IN**

Repair wilkinson's	Days to Repair
Facility:	License #

98 SUBA LEGACY OUTBACK 4-2.5L-FI 4D WGN

VIN: 4S3BG6856W7600786	Lic: acn2578	PA Prod Date:	Odometer: 15056
Air Conditioning	Rear Defogger	Tilt Wheel	
Cruise Control	Intermittent Wipers	Dual Mirrors	
Luggage/Roof Rack	Clear Coat Paint	Two Tone Paint	
Power Steering	Power Brakes	Power Windows	
Power Locks	Power Mirrors	Anti-Lock Brakes (4)	
Driver Airbag	Passenger Airbag	Cloth Seats	
Bucket Seats	Recline/Lounge Seats	Aluminum Wheels	

02/22/1999 at 11:53 AM
36058

5437B 25884702159901J/B1

ESTIMATE OF RECORD

98 SUBA LEGACY OUTBACK 4-2.5L-FI 4D WGN

NO.	OP.	DESCRIPTION	QTY	PRICE	LABOR	PAINT
1		FRONT BUMPER				
2		O/H front bumper			2.5	
3		Repl Bumper cover	1	249.95	Incl.	2.4
4		Add for Clear Coat				1.0
Subtotals ==>				249.95	2.5	3.4

Parts	249.95	
Body Labor	2.5 hrs @ \$ 32.00/hr	80.00
Paint Labor	3.4 hrs @ \$ 32.00/hr	108.80
Paint Supplies	3.4 hrs @ \$ 16.00/hr	54.40
SUBTOTAL	\$ 493.15	
Sales Tax	\$ 493.15 @ 6.0000%	29.59
TOTAL COST OF REPAIRS	\$ 522.74	

ADJUSTMENTS:

Deductible	0.00
TOTAL ADJUSTMENTS	\$ 0.00
NET COST OF REPAIRS	\$ 522.74

765-8152

765-1788

12-27-99

Boyles

UNIBET|Reynolds and Reynolds|UNIBET

RENTER

LARRY & JOANNE BUCKERMAN
ADDRESS
P.O. Box 105
Circleville PA 16833

Wilkinson's SUBARU
312 S. ST
Curwensville PA 16833

CAR RENTAL AGREEMENT

24037

TIME IN	TIME OUT	DRIVER'S LICENSE NO.		STATE	EXPIRES	DATE 12-27-99 - 12-30-99
LICENSE NO.	VEH. NO.	MAKE	BODY STYLE	I WILL RETURN CAR BY		RATE:
PURCH. ORD. NO.	DATE OF AGREEMENT			DATE OUT BY	TIME IN BY	\$ PER MILES @
CREDIT CARD				MILEAGE IN		PER MILLE
OTHER REFERENCE				MILEAGE OUT		HOURS @
REMARKS				MILES DRIVEN		4 DAYS @ 10.00 80.00
INSURANCE CO. GILIE INS				AGENT 11-14-99-51400	POLICY NO. Q111404/14N	WEEKS @
MILEAGE LIMITATION (SEE 4. ON REVERSE SIDE)						MONTHS @

MILE RADIUS

BY

LESSOR

REQUEST FOR PERMISSION FOR PERSON OTHER THAN RENTER TO DRIVE

I hereby request Lessor's permission to allow _____ to drive this vehicle.

Driver's
Lic. No. _____APPROVED
BY LESSOR: _____

RENTER: _____

DAMAGE

SUB TOTAL

06% TAX

48.00

NET AMOUNT DUE

92.80

DRIVER'S
ADDRESS

CITY

STATE

PHONE

TERMS ON REVERSE SIDE

RENTALS CASH

DRIVE SAFELY

FORM SRA-22 (4-97)

Reynolds and Reynolds

Page : 1 CLFD AMERICAN HOMEPATIENT Time: 14:22:11
Order#: 00333534 23 N. SECOND ST. Date: 02/18/1999
CURRENT Customer
CLEARFIELD PA 16830
Phone: 814 765-5700

Name : SALE CASH Delivery Date: 02/18/1999
Address: ANYWHERE
Address:
City : PA
State : PA Zip: 16651 Phone: 814 000-0000

INVOICE					
QTY	QTY	PRODUCT	DESCRIPTION	TRAN	AMOUNT
DELIVER	RETURN			TYPE	
1		8013	CUSHION LUMBAR BACK BLACK DUROMED 8013	SALE	17.20
			@ 17.20 per EACH	TX	.00

CASH SALES TAX: .00

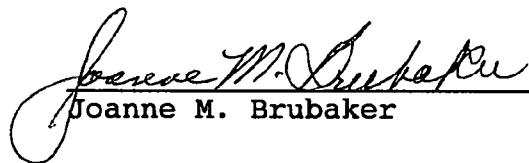
P.O.#: TOTAL: 17.20

Primary Insurance: CASH CASH SALE	Coinsurance: SPC SELF PAY CO-INSURANCE	Invoice# 00594107
--------------------------------------	---	----------------------

Salesman Del. By Ship Received or Returned By DAVE Truck!	Customer Number 00000000011562
--	-----------------------------------

VERIFICATION

The undersigned verifies that she is a Plaintiff in the within action, and that the statements made in the foregoing Response to Request for Production of Documents to Plaintiffs are true and correct to the best of her knowledge, information and belief. The undersigned understands that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.



Joanne M. Brubaker

Date: 7-21-00

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of July, 2000, a true and correct copy of the Plaintiffs' Response to Request for Production of Documents Directed to Plaintiffs was sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By: 

Laurance B. Seaman, Esquire
Attorney for Plaintiffs

8
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
husband and wife,
Plaintiffs

vs.

AIMEE LEIGH SHAFFER,
Defendant

: No. 00-446-CD
: Type of Case: Civil
:
: Type of Pleading: PLAINTIFF'S
: SUPPLEMENTAL RESPONSE TO REQUEST FOR
: PRODUCTION OF DOCUMENTS
:
: CERTIFICATE OF SERVICE
:
: Filed on behalf of:
: Plaintiffs
:
: Counsel of Record for this Party:
: Laurance B. Seaman, Esquire
:
: Supreme Court No.: 19620
:
: GATES & SEAMAN
: Attorneys at law
: Two North Front Street
: P. O. Box 846
: Clearfield, Pennsylvania 16830
: (814) 765-1766
:
:
:
:
:

FILED

AUG 18 2000

William A. Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of August, 2000,
a true and correct copy of the Plaintiffs' Supplemental Response
to Request for Production of Documents Directed to Plaintiffs was
sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By:


Laurance B. Seaman, Esquire
Attorney for Plaintiffs

FILED NO. CC
AUG 18 2000 EAT
William A. Shaw
Prothonotary

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

: No. 00-446-CD
: Type of Case: Civil
: Type of Pleading: PLAINTIFF'S
: SUPPLEMENTAL RESPONSE TO REQUEST FOR
: PRODUCTION OF DOCUMENTS
: CERTIFICATE OF SERVICE
: Filed on behalf of:
: Plaintiffs
: Counsel of Record for this Party:
: Laurance B. Seaman, Esquire
: Supreme Court No.: 19620
: GATES & SEAMAN
: Attorneys at law
: Two North Front Street
: P. O. Box 846
: Clearfield, Pennsylvania 16830
: (814) 765-1766

FILED

SEP 29 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September, 2000, a true and correct copy of the Plaintiffs' Supplemental Response to Request for Production of Documents Directed to Plaintiffs was sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By: 

Laurance B. Seaman, Esquire
Attorney for Plaintiffs

FILED

NO
cc

10/27/00
SEP 29 2000

William A. Shaw
Prothonotary

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

JOANNE M. BRUBAKER and
LARRY W. BRUBAKER,
husband and wife,
Plaintiffs
vs.
AIMEE LEIGH SHAFFER,
Defendant

File No. 00-446-CD
Type of Case: Civil
Type of Pleading: PLAINTIFF'S 3rd
SUPPLEMENTAL RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS
CERTIFICATE OF SERVICE
Filed on behalf of:
Plaintiffs
Counsel of Record for this Party:
Laurance B. Seaman, Esquire
Supreme Court No.: 19620
GATES & SEAMAN
Attorneys at law
Two North Front Street
P. O. Box 846
Clearfield, Pennsylvania 16830
(814) 765-1766

100

NOV 03 2000

William A. Shaw
Promotionary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November, 2000,
a true and correct copy of the Plaintiffs' 3rd Supplemental
Response to Request for Production of Documents Directed to
Plaintiffs was sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By:



Laurance B. Seaman, Esquire
Attorney for Plaintiffs

FILED

NOV 03 2000
SAC
OL 3 LOS MECH
WILLIAM A. GILLEN
Postmaster

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
:
-vs- :
:
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November,
2000, a true and correct copy of the Plaintiffs' 4th
Supplemental Response to Request for Production of Documents
Directed to Plaintiffs was personally handed to:

Dennis J. Stofko, Esquire
P. O. Box 5500
Johnstown, PA 15904

Gates & Seaman
By: 

Laurance B. Seaman, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 00-446-CD

BRUBAKER VS. SHAFFER

PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT

10/23/01
NO RC

WILLIAM A. SEAMAN
LAW OFFICES

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 846
CLEARFIELD, PA. 16830

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

FILED

MAY 22 2009

show
tary

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
: :
-vs- : :
AIMEE LEIGH SHAFFER, Defendant : :

PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANTS EDWARDS AND SHAFFER

TO: AIMEE LEIGH SHAFFER, Defendant
c/o Dennis J. Stofko, Esquire
R. THOMAS STRAYER LAW OFFICES
P. O. Box 5500
Johnstown, PA 15904-5500

You are hereby requested to produce in accordance with Rule 4009 of the Pennsylvania Rules of Civil Procedure the below listed documents and/or items. These documents can be photocopied and forwarded to the Office of Gates & Seaman, Two North Front Street, P. O. Box 846, Clearfield, Clearfield County, Pennsylvania 16830, within thirty (30) days of the date herein:

1. A complete copy of the insurance investigative file, including photocopies of all photographs.
2. Declaration Sheet for the Defendant's automotive insurance, showing existence and amount of insurance coverage on the insured vehicle operated by the Defendant at the time of the accident giving rise to this claim.

This request is deemed to be continuing insofar as if any of the requested documents and/or items are secured

subsequent to the date herein for the production of same, said documents and/or items are to be provided to Plaintiffs' counsel immediately upon the receipt of the same.

GATES & SEAMAN

By 

Laurence B. Seaman, Esquire
Attorney for Plaintiffs

Date: November 29, 2000

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

JOANNE M. BRUBAKER and :
LARRY W. BRUBAKER, Plaintiffs : No. 00-446-CD
: :
-vs- :
: :
AIMEE LEIGH SHAFFER, Defendant :
:

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2000, a true and correct copy of Plaintiffs' Request for Production of Documents Directed to Defendant was sent by regular U. S. mail to:

Dennis J. Stofko, Esquire
R. THOMAS STRAYER LAW OFFICES
P. O. Box 5500
Johnstown, PA 15904-5500

Gates & Seaman
By: 

Laurance B. Seaman, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

JOANNE M. BRUBAKER and LARRY W.
BRUBAKER,

Plaintiffs

vs.

No. 2000-446 CD

AIMEE LEIGH SHAFFER,

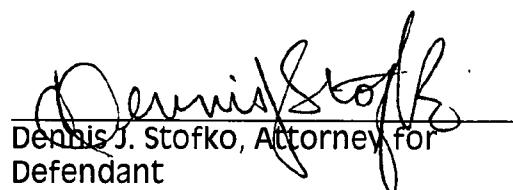
Defendant

PRAECIPE

Please mark the above captioned matter ended, settled and forever
discontinued.



Laurance B. Seaman, Attorney for
Plaintiffs



~~Dennis J. Stofko~~

~~Dennis J. Stofko, Attorney for
Defendant~~

FILED

MAY 23 2001

William A. Shaw
Prothonotary

FILED

MAY 23 2001
C-355-110cc Cont. Rec.
William A. Shaw
Prothonotary

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atty
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IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Joanne M. Brubaker
Larry W. Brubaker

Vs.
Aimee Leigh Shaffer

No. 2000-00446-CD

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 on 5/24/01 marked:

Settle and Discontinue.

Record costs in the sum of \$111.33 have been paid in full by Laurance Seaman.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 24th day of May A.D. 2001.



William A. Shaw, Prothonotary