

00-1019-CD  
Sobel Collins & Knaresboro vs R. Showden

00

00-1019-CD  
SOBEL, COLLINS & KNARESBORO -vs- ROBERT SHOWDEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

 SOBEL, COLLINS & KNARESBORO,  
Plaintiff

: No. 00-1019-CD

v.

 ROBERT SHOWDEN,  
Defendant

: Type of Pleading:  
Complaint

:

: Filed on behalf of:  
Sobel, Collins & Knaresboro

:

:

:

:

: Counsel for this party:  
Gary A. Knaresboro, Esquire

:

:

:

: Supreme Court No. 52097

: Sobel, Collins & Knaresboro  
Attorneys at Law  
: 218 South Second Street  
Clearfield, PA 16830  
: (814) 765-6555  
: (814) 765-6210 FAX

**FILED**

AUG 18 2000

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)

SOBEL, COLLINS & KNARESBORO : No. 00- -CD  
Plaintiff :  
v. :  
ROBERT SHOWDEN,  
Defendant :  
v.

NOTICE

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

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

Office of the Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
(814) 765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)

SOBEL, COLLINS & KNARESBORO, :  
Plaintiff : No. 00- -CD  
v. :  
ROBERT SHOWDEN, :  
Defendant :

COMPLAINT

NOW COMES, Plaintiff, who avers the following cause of action:

1. Plaintiff law firm is a partnership organized for the practice of law consisting of John A. Sobel, IV, Esquire, Ronald L. Collins, Esquire and Gary A. Knaresboro, Esquire, with its principal office located at 218 South Second Street, Clearfield, Pennsylvania 16830.

2. Defendant, Robert Showden, is an individual who resides at Box 597, Houtzdale, Pennsylvania 16651.

3. John A. Sobel, IV, Esquire, Ronald L. Collins, Esquire and Gary A. Knaresboro, Esquire are members of the Bar Association of Clearfield County and are admitted to practice law in front of all Courts of the Commonwealth of Pennsylvania.

4. On or about July 10, 1996 the Defendant signed a written fee agreement retaining and employing the plaintiff to represent him in a Divorce Action and related family law matters and agreed to compensate said attorney for services rendered as follows:

(a) \$500.00 advanced for Retainer;  
(b) \$100.00 advanced for costs;  
(c) \$100.00 per hour for all other work performed all of which is set forth in said attorney's retainer letter of July 9, 1996 which is attached hereto and made a part hereof as Exhibit "A".

5. Plaintiff, particularly Gary A. Knaresboro, Esquire, thereupon at Defendant's direction and request performed legal services for the Defendant in the ongoing divorce litigation, which included work on the issues of protection from abuse, equitable distribution of marital property, which services are itemized in Plaintiff's statement for professional services rendered, which are attached hereto and made a part hereof collectively as Exhibit "B".

6. The reasonable value of the services rendered by Plaintiff, in particular Gary A. Knaresboro, Esquire, to the Defendant, which said Defendant agreed to pay for, including all advanced costs, out of pocket expenses, which remain unpaid, is the sum of \$4,693.00, as reflected on the last page of Exhibit "B".

7. Plaintiff has offered that the Defendant pay a discounted sum of \$750.00 if the defendant paid within 30 days of demand which he refused demanding a complete itemization of legal services.

8. The Plaintiff provided the Defendant with an itemized bill and demand that the defendant pay \$4,693.00 or to set up a reasonable monthly payment schedule which Defendant has failed or refused to do so, and thus the sum of \$4,693.00 remains due and owing.

WHEREFORE, Plaintiff demands judgment against Defendant, for the sum of \$4,693.00, plus interest and costs of suit.

SOBEL, COLLINS & KNARESBORO

By:



Gary A. Knaresboro  
Gary A. Knaresboro, Esquire

July 9, 1996

Robert Showden  
RD 1, Box 595 D  
Houtzdale, PA 16651

**RE: Fee Agreement/Divorce & Collateral Issues**

Dear Robert:

Thank you very much for your interest in our representation of you in your marital case. This letter will set forth the fee structure with respect to our representation of you. Understandably, the matter of legal fees and expenses are of utmost importance to you. Because of the complexity of Litigation, it is not possible to inform you of the total fees and expenses to be incurred in our representation if you before the end of your case. Nevertheless, I think it is important to send you this letter outlining the basis on which fees and expenses will be charged.

1. Scope of Representation. The scope of the representation which we will undertake upon receipt of your initial retainer and a signed copy of this letter is limited to the Divorce case.

2. Basis for Charging Legal Fees. An assigned hourly rate of \$100.00, minimum billing is one quarter hour.

3. Costs. You will be responsible to pay on a current basis all out-of-pocket expenses incurred on your behalf. This would include, but not limited to filing fees, transcripts, depositions, photocopies, subpoenas, long distance telephone calls, investigative expenses, photographs, and any of my educational videotapes that you elect to view in preparation for trial. It will be necessary for you to advance or reimburse the money for those costs. You will be responsible to pay all fees and costs charged by experts such as appraisers, accountants, actuaries. You authorize the firm to secure, at your expense, the services of such experts, if necessary in my judgment for the preparation of your case.

**EXHIBIT**

"A"

July 9, 1996

Robert Showden  
Page 2

4. Time Records. I keep a daily record of the time expended on each case, which includes all activities undertaken on your behalf, including your initial interview, consultations, correspondence, preparation of documents, court appearances and telephone calls, etc. All time charges are recorded in minimum units of one quarter of an hour. My time records in your matter are available if you have any questions about any bill.

5. Billing. I will be sending you a monthly statement reflecting your fees and costs to a given date. When your fee exceed your retainer payment, I will bill you for such excess and payment will be due within 10 days of the billing date. If you have any questions concerning the bill, don't hesitate to communicate with me. I am confident that you will make every effort to pay promptly. Occasionally a client will have difficulty making a timely payment. To avoid burdening those clients who pay their statement promptly with higher fees reflecting the added costs I incur as a result of clients who do not pay on a current basis, I reserve the right to charge interest on any outstanding past due balance at a rate of one and a half percent per month. In addition, it is my policy to suspend my activity in those cases where outstanding balances are more than 60 days overdue, unless other arrangements for payment have been agreed to in writing. I reserve the right to terminate my attorney-client relationship for non-payment of fees or costs.

6. Retainer. The retainer requested in your case functions as a deposit against which my time charges and costs are applies. As previously indicated, I am not able to anticipate or estimate at this time what the total fee may be at the end of your case. In the event that your case goes to trial, I reserve the right to require a trial retainer prior to trial to cover my preparation time and trial time. Further, in the event that an emergency issue arises, or appeals are taken, I reserve the right to require an additional retainer.

7. Telephone Calls and Messages. There will be times when I will be in court, in meetings, or otherwise unavailable to answer you call.

July 9, 1996

Robert Showden  
Page 3

Would you please sign, date, and return the extra copy of this letter which is enclosed indicating that you have read it and signifying your approval of the terms and conditions set forth, along with the non-refundable minimum retainer fee of \$500.00, plus \$100.00 costs.

If there are any questions whatsoever with respect to the legal fees and expenses which you will be incurring in my representation of you, do not hesitate to call or arrange to meet with me.

Sincerely,



Gary A. Knaresboro, Esquire

GAK/tcs  
Enclosure

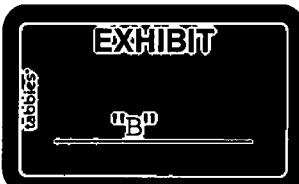
I have read the foregoing letter and I agree to its terms.

7-10-96  
Date

Robert Showden  
Robert Showden

Robert Showden

5/30/96	Review of PFA Complaint & Preparation of case -----	1 hr	N/C
6/3/96	PFA Hearing -----	2 hrs.	N/C
6/8/96	In office meeting -----	3/4 hrs.	N/C
7/9/96	Fee Agreement ----- Legal Fees \$500.00 Costs \$100.00		
7/10/96	Preliminary Hearing at Clearfield County Jail -----	2 hrs.	
7/16/96	Preparation & Filing of Complaint in Divorce -----	1 hr.	
	Costs --- \$80.00		
7/16/96	Mailing of Complaint in Divorce Costs --- \$5.50		
8/1/96	Preparation & filing of Certificate of Service - Interrogatories -----	1 1/2 hrs.	
9/18/96	Office Appointment -----	1 hr.	
10/15/96	Receipt & review of Answer to Complaint in Divorce -----	1/2 hr.	
10/21/96	Letter to client -----	1/4 hr.	
10/27/96	Letter from client -----		
11/96	Receipt & Review of DRO Complaint -----	1/4 hr.	
11/19/96	Office Appointment -----	3/4 hr.	
11/26/96	Settlement Offer/Letter -----	1 3/4 hrs.	
12/2/96	Letter from Attorney Bell -----	1/4 hr.	



12/4/96 Subpoena for Paul Wild -----  
Cost---\$32.50

12/4/96 Letter from Attorney Bell/call to client - 1/4 hr.

12/5/96 Letter from client ----- 1/4 hr.

12/5/96 Letter from Attorney Bell ----- 1/4 hr.

12/6/96 Letter to Attorney Bell ----- 1/4 hr.

12/7/96 Letter from client ----- 1/4 hr.

1/30/97 DRO Hearing ----- 1 1/2 hrs.

1/31/97 Letter to client/Letter to Attorney Bell - 1/2 hr.

1/31/97 Letter from DRO ----- 1/4 hr.

1/31/97 Demand for De Novo Hearing & Filing ----- 1/2 hr.

2/5/97 Letter from DRO ----- 1/4 hr.

2/28/97 Meeting with client ----- 1/4 hr.

3/2/97 Letter from client ----- 1/4 hr.

3/10/97 Letter from client ----- 1/4 hr.

3/24/97 Letter to Attorney Bell ----- 1/4 hr.

4/1/97 Preparation & mailing of Plaintiff's  
Interrogatories directed to Defendant ---- 1/2 hr.

4/4/97 Preparation and filing of Certificate of  
Service - Interrogatories ----- 1 1/2 hrs.

4/11/97 Receipt & Review of PenDot Papers from  
client ----- 1/4 hr.

4/28/97 Letter to client ----- 1/4 hr.

4/28/97 Letter from client ----- 1/4 hr.

5/5/97 Letter from client ----- 1/4 hr.

5/19/97 Letter from client ----- 1/4 hr.

5/26/97 Letter from client ----- 1/4 hr.

5/27/97 Letter to Attorney Bell ----- 1/4 hr.

5/27/97 Preparation of Last Will & Testament ----- 1 hr.

6/4/97 Letter from client ----- 1/4 hr.

6/11/97 DRO Hearing ----- 1 1/2 hrs.

6/16/97 Receipt of Order from DRO ----- 1/4 hr.

6/12/97 Letter to client ----- 1/4 hr.

6/16/97 Letter from client ----- 1/4 hr.

7/1/97 Letter from client ----- 1/4 hr.

7/11/97 DRO Hearing - Judge Ammerman ----- 1 1/2 hrs.

7/12/97 Letter from client ----- 1/4 hr.

7/14/97 Letter from client ----- 1/4 hr.

7/17/97 Letter to client/copy of Order ----- 1/4 hr.

7/20/97 In office meeting ----- 3/4 hr.

7/23/97 Trial ----- 4 hrs.

7/28/97 Letter from client ----- 1/4 hr.

7/28/97 Preparation & filing of Motion for  
Sanctions for Failure to Answer  
Interrogatories ----- 1 1/2 hrs.

8/4/97 Copy of Certificate of Service/Letter to  
Attorney Bell ----- 1/4 hr.

9/2/97 Letter from client ----- 1/4 hr.

9/18/97 Letter from client ----- 1/4 hr.

9/25/97 Letter to Attorney Bell with Com. Check -- 1/4 hr.

9/25/97 Preparation & filing of Certificate of  
Service ----- 1/2 hr.

10/14/97 Office Appointment ----- 3/4 hr.

10/97 Letter from Attorney Bell ----- 1/4 hr.

10/31/97 Letter to client ----- 1/4 hr.

11/3/97 Letter to client ----- 1/4 hr.

11/6/97 Letter from client ----- 1/4 hr.

12/12/97 Phone Conference ----- 1/4 hr.

12/29/97 Preparation & filing of Petition for Contempt ----- 1 1/2 hrs.

1/5/98 Letter to Attorney Bell & Client ----- 1/4 hr.

1/11/98 Letter from client ----- 1/4 hr.

1/12/98 Receipt of Defendant's Medical Bills from client ----- 1/4 hr.

1/20/98 Letter to DRO, Judge Ammerman & Solicitor 1/2 hr.

1/27/98 Letter to DRO ----- 1/4 hr.

1/27/98 Letter to client ----- 1/4 hr.

2/2/98 Receipt of Attorney Bell's Certificate of Service of Answers to Plaintiff's Interrogatories Directed to Defendant ---- 1/4 hr.

2/2/98 Petition for Contempt ----- 1/2 hr.

2/2/98 Letter from Attorney Bell ----- 1/4 hr.

2/3/98 Letter to client ----- 1/4 hr.

2/8/98 Letter from client ----- 1/4 hr.

2/9/98 Letter to client/copy of Order ----- 1/4 hr.

2/9/98 Receipt & review of Defendant's Answer to Plaintiff's Interrogatories Directed to Defendant ----- 3/4 hr.

2/16/98 Letter to Attorney Bell ----- 1/4 hr.

5/6/98 Office Appointment ----- 1 hr.

7/30/98 Letter from client ----- 1/4 hr.

4/8/99 Completion & filing of Motion for Appointment of Master/Budget Information/Inventory and Appraisement/Plaintiff's Pre-Trial Statement ----- 6 1/2 hrs.  
(client advanced \$200.00 for filing costs)

4/13/99 Receipt of Order from Judge Ammerman ----- 1/4 hrs.

4/14/99 Hand delivery of Motion for Appointment of  
Master/Budget Information/Inventory and  
Appraisement/Plaintiff's Pre-Trial  
Statement ----- N/C

5/11/99 Receipt & Review of Defendant's Inventory  
and Appraisement ----- 3/4 hr.

5/14/99 Receipt & Review of Defendant's Pre-Trial  
Statement, Budget Information ----- 3/4 hr.

5/18/99 Pre-Trail Conference ----- 3/4 hr.

8/16/99 Letter from client to stop divorce ----- 1/4 hr.

8/18/99 Letter to client ----- 1/4 hr.

9/13/99 Preparation & filing of Praecipe to Settle  
& Discontinue ----- 1/2 hr.

9/14/99 Copy of Certificate of Discontinuance with  
letter ----- 1/4 hr.

**Professional Fees**

51.75/hrs @ \$100/hr. -----	\$5,175.00
Less Retainer	<u>-500.00</u>
Amount Due -----	<b>\$4,675.00</b>

**Costs**

Filing Fee for Complaint in Divorce -----	\$80.00
Mailing of Complaint in Divorce -----	5.50
Subpoena Service -----	<u>32.50</u>
	<b>\$118.00</b>

Total Costs -----	\$118.00
less amount advanced by client -----	<u>100.00</u>
Amount Due -----	<b>\$18.00</b>

**TOTAL AMOUNT DUE ----- \$4,693.00**

00- -CD

SOBEL, COLLINS & KNARESBORO

v.

ROBERT SHOWDEN

COMPLAINT

FILED

3cc  
O 3 30  
AUG 18 2000  
444  
John  
William A. Shaw  
Prothonotary  
Ally Rd  
80.00

Sobel, Collins & Knaresboro  
ATTORNEYS & COUNSELORS AT LAW  
218 SOUTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830  
(814) 765-5552  
(814) 765-6555

In The Court of Common Pleas of Clearfield County, Pennsylvania  
Sheriff Docket # 10082

SOBEL, COLLINS & KNARESBORO

VS.

SHOWDEN, ROBERT

00-1019-CD

**COMPLAINT**

**SHERIFF RETURNS**

---

NOW SEPTEMBER 27, 2000 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN  
THE WITHIN COMPLAINT "NOT FOUND" AS TO ROBERT SHOWDEN, DEFENDANT.  
NEW ADDRESS: 8144 N. 33RD AVE., 216S, PHOENIX, ARIZONA 85051.

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Return Costs

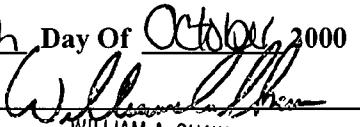
Cost	Description
15.33	SHFF. HAWKINS PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

**FILED**

OCT 04 2000  
013:40pm  
William A. Shaw  
Prothonotary

EK

Sworn to Before Me This

4th Day Of October, 2000  
  
WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2002  
Clearfield Co., Clearfield, PA.

So Answers,

  
Chester A. Hawkins  
Sheriff

*Sobel, Collins & Marechard*  
ATTORNEYS & COUNSELORS AT LAW  
218 SOUTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830  
(814) 765-5552 (814) 765-6555

I HEREBY CERTIFY THIS TO BE A TRUE AND CORRECT  
COPY OF THE ORIGINAL FILED IN THIS MATTER.

ATTORNEY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

SOBEL, COLLINS & KNARESBORO, : No. 00-1019-CD  
Plaintiff :  
v. :  
ROBERT SHOWDEN, :  
Defendant :  
: Type of Pleading:  
: Complaint  
: Filed on behalf of:  
: Sobel, Collins & Knaresboro  
: Counsel for this party:  
: Gary A. Knaresboro, Esquire  
: Supreme Court No. 52097  
: Sobel, Collins & Knaresboro  
: Attorneys at Law  
: 218 South Second Street  
: Clearfield, PA 16830  
: (814) 765-6555  
: (814) 765-6210 FAX

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

AUG 18 2000

Attest: *William L. Schaeffer*  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)

SOBEL, COLLINS & KNARESBORO : No. 00- -CD  
Plaintiff :  
v. :  
ROBERT SHOWDEN, :  
Defendant

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SOBEL, COLLINS & KNARESBORO, :  
Plaintiff : No. 00- -CD  
v. :  
ROBERT SHOWDEN, :  
Defendant :  
:

COMPLAINT

NOW COMES, Plaintiff, who avers the following cause of action:

1. Plaintiff law firm is a partnership organized for the practice of law consisting of John A. Sobel, IV, Esquire, Ronald L. Collins, Esquire and Gary A. Knaresboro, Esquire, with its principal office located at 218 South Second Street, Clearfield, Pennsylvania 16830.

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(a) \$500.00 advanced for Retainer;  
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5. Plaintiff, particularly Gary A. Knaresboro, Esquire, thereupon at Defendant's direction and request performed legal services for the Defendant in the ongoing divorce litigation, which included work on the issues of protection from abuse, equitable distribution of marital property, which services are itemized in Plaintiff's statement for professional services rendered, which are attached hereto and made a part hereof collectively as Exhibit "B".

6. The reasonable value of the services rendered by Plaintiff, in particular Gary A. Knaresboro, Esquire, to the Defendant, which said Defendant agreed to pay for, including all advanced costs, out of pocket expenses, which remain unpaid, is the sum of \$4,693.00, as reflected on the last page of Exhibit "B".

7. Plaintiff has offered that the Defendant pay a discounted sum of \$750.00 if the defendant paid within 30 days of demand which he refused demanding a complete itemization of legal services.

8. The Plaintiff provided the Defendant with an itemized bill and demand that the defendant pay \$4,693.00 or to set up a reasonable monthly payment schedule which Defendant has failed or refused to do so, and thus the sum of \$4,693.00 remains due and owing.

WHEREFORE, Plaintiff demands judgment against Defendant, for the sum of \$4,693.00, plus interest and costs of suit.

SOBEL, COLLINS & KNARESBORO

By:



Gary A. Knaresboro  
Gary A. Knaresboro, Esquire

July 9, 1996

Robert Showden  
RD 1, Box 595 D  
Houtzdale, PA 16651

**RE: Fee Agreement/Divorce & Collateral Issues**

Dear Robert:

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"A"

July 9, 1996

Robert Showden  
Page 2

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Robert Showden  
Page 3

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Sincerely,

  
Gary A. Knaresboro, Esquire

GAK/tcs  
Enclosure

I have read the foregoing letter and I agree to its terms.

7-10-96 Robert Showden  
Date Robert Showden

Robert Showden

**EXHIBIT**

"B"

12/4/96 Subpoena for Paul Wild -----  
Cost---\$32.50

12/4/96 Letter from Attorney Bell/call to client - 1/4 hr.

12/5/96 Letter from client ----- 1/4 hr.

12/5/96 Letter from Attorney Bell ----- 1/4 hr.

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6/4/97 Letter from client ----- 1/4 hr.

6/11/97 DRO Hearing ----- 1 1/2 hrs.

6/16/97 Receipt of Order from DRO ----- 1/4 hr.

6/12/97 Letter to client ----- 1/4 hr.

6/16/97 Letter from client ----- 1/4 hr.

7/1/97 Letter from client ----- 1/4 hr.

7/11/97 DRO Hearing - Judge Ammerman ----- 1 1/2 hrs.

7/12/97 Letter from client ----- 1/4 hr.

7/14/97 Letter from client ----- 1/4 hr.

7/17/97 Letter to client/copy of Order ----- 1/4 hr.

7/20/97 In office meeting ----- 3/4 hr.

7/23/97 Trial ----- 4 hrs.

7/28/97 Letter from client ----- 1/4 hr.

7/28/97 Preparation & filing of Motion for  
Sanctions for Failure to Answer  
Interrogatories ----- 1 1/2 hrs.

8/4/97 Copy of Certificate of Service/Letter to  
Attorney Bell ----- 1/4 hr.

9/2/97 Letter from client ----- 1/4 hr.

9/18/97 Letter from client ----- 1/4 hr.

9/25/97 Letter to Attorney Bell with Com. Check -- 1/4 hr.

9/25/97 Preparation & filing of Certificate of  
Service ----- 1/2 hr.

10/14/97 Office Appointment ----- 3/4 hr.

10/97 Letter from Attorney Bell ----- 1/4 hr.

10/31/97 Letter to client ----- 1/4 hr.

11/3/97 Letter to client ----- 1/4 hr.

11/6/97 Letter from client ----- 1/4 hr.

12/12/97 Phone Conference ----- 1/4 hr.

12/29/97 Preparation & filing of Petition for Contempt ----- 1 1/2 hrs.

1/5/98 Letter to Attorney Bell & Client ----- 1/4 hr.

1/11/98 Letter from client ----- 1/4 hr.

1/12/98 Receipt of Defendant's Medical Bills from client ----- 1/4 hr.

1/20/98 Letter to DRO, Judge Ammerman & Solicitor 1/2 hr.

1/27/98 Letter to DRO ----- 1/4 hr.

1/27/98 Letter to client ----- 1/4 hr.

2/2/98 Receipt of Attorney Bell's Certificate of Service of Answers to Plaintiff's Interrogatories Directed to Defendant ---- 1/4 hr.

2/2/98 Petition for Contempt ----- 1/2 hr.

2/2/98 Letter from Attorney Bell ----- 1/4 hr.

2/3/98 Letter to client ----- 1/4 hr.

2/8/98 Letter from client ----- 1/4 hr.

2/9/98 Letter to client/copy of Order ----- 1/4 hr.

2/9/98 Receipt & review of Defendant's Answer to Plaintiff's Interrogatories Directed to Defendant ----- 3/4 hr.

2/16/98 Letter to Attorney Bell ----- 1/4 hr.

5/6/98 Office Appointment ----- 1 hr.

7/30/98 Letter from client ----- 1/4 hr.

4/8/99 Completion & filing of Motion for Appointment of Master/Budget Information/Inventory and Appraisement/Plaintiff's Pre-Trial Statement ----- 6 1/2 hrs.  
(client advanced \$200.00 for filing costs)

4/13/99 Receipt of Order from Judge Ammerman ----- 1/4 hrs.

4/14/99 Hand delivery of Motion for Appointment of  
Master/Budget Information/Inventory and  
Appraisement/Plaintiff's Pre-Trial  
Statement ----- N/C

5/11/99 Receipt & Review of Defendant's Inventory  
and Appraisement ----- 3/4 hr.

5/14/99 Receipt & Review of Defendant's Pre-Trial  
Statement, Budget Information ----- 3/4 hr.

5/18/99 Pre-Trail Conference ----- 3/4 hr.

8/16/99 Letter from client to stop divorce ----- 1/4 hr.

8/18/99 Letter to client ----- 1/4 hr.

9/13/99 Preparation & filing of Praeclipe to Settle  
& Discontinue ----- 1/2 hr.

9/14/99 Copy of Certificate of Discontinuance with  
letter ----- 1/4 hr.

**Professional Fees**

51.75/hrs @ \$100/hr. -----	\$5,175.00
Less Retainer -----	<u>-500.00</u>
Amount Due -----	<u>\$4,675.00</u>

**Costs**

Filing Fee for Complaint in Divorce -----	\$80.00
Mailing of Complaint in Divorce -----	5.50
Subpoena Service -----	<u>32.50</u>
	\$118.00

Total Costs -----	\$118.00
less amount advanced by client -----	<u>100.00</u>
Amount Due -----	<u>\$18.00</u>

**TOTAL AMOUNT DUE ----- \$4,693.00**



OFFICE OF COURT ADMINISTRATOR  
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA

CLEARFIELD COUNTY COURTHOUSE  
SUITE 228, 230 EAST MARKET STREET  
CLEARFIELD, PENNSYLVANIA 16830

DAVID S. MEHOLICK  
COURT ADMINISTRATOR

PHONE: (814) 765-2641  
FAX: 1-814-765-7649

MARCY KELLEY  
DEPUTY COURT ADMINISTRATOR

### Notice of Proposed Termination of Court Case

November 10, 2005

RE: 00-1019-CD  
Sobel, Collins & Knaresboro  
Vs.  
Robert Showden

Dear Plaintiff/Defendant:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary** of Clearfield County, 230 East Market Street, Clearfield, Pennsylvania 16830. The Statement of Intention to Proceed must be filed on or before January 17, 2005.

**If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.**

By the Court,

A handwritten signature in black ink that appears to read "David S. Meholic".

David S. Meholic  
Court Administrator



**OFFICE OF COURT ADMINISTRATOR  
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA**

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David S. Meholick  
Court Administrator

00-1019-CD

WILLIAM A. SHAW  
PROTHONOTARY  
and CLERK of COURTS  
P.O. BOX 549  
CLEARFIELD, PENNSYLVANIA 16830

FILED

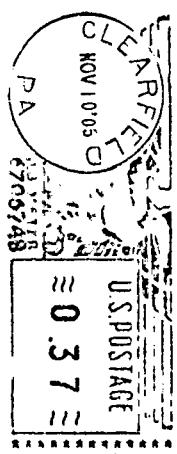
NOV 16 2005

William A. Shaw  
Prothonotary/Clerk of Courts

Robert Showden  
Box 597

Houtzdale PA 16830  
A  INSUFFICIENT ADDRESS  
C  ATTEMPTED NOT KNOWN  
S  NO SUCH NUMBER/STREET  
 NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

RTS  
RETURN TO SENDER





**OFFICE OF COURT ADMINISTRATOR  
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA**

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David S. Meholick  
Court Administrator

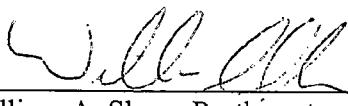
In the Court of Common Pleas of Clearfield County, Pennsylvania  
Civil Division

In Re: Inactive Case Dismissal

06-01-MD

I, William A. Shaw, hereby certify that notice of termination for the following inactive cases was published in the Clearfield County Legal Journal January 27, 2006, per Rule 230.2:

96-0188-CD	00-0793-CD	00-1532-CD
96-1586-CD	00-0799-CD	01-0146-CD
98-1317-CD	00-0822-CD	01-0237-CD
00-0046-CD	00-0823-CD	01-1030-CD
00-0143-CD	00-0992-CD	01-1869-CD
00-0203-CD	00-1019-CD	02-0373-CD
00-0533-CD	00-1061-CD	02-0374-CD
00-0543-CD	00-1062-CD	02-1300-CD
00-0567-CD	00-1078-CD	02-1308-CD
00-0629-CD	00-1085-CD	02-1610-CD
00-0732-CD	00-1220-CD	03-0091-CD
00-0756-CD	00-1264-CD	03-0138-CD
00-0760-CD	00-1321-CD	03-0172-CD
00-0768-CD	00-1372-CD	03-1148-CD
00-0782-CD	00-1386-CD	03-1176-CD
00-0791-CD	00-1492-CD	

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

FILED

MAY 04 2006

William A. Shaw  
Prothonotary/Clerk of Courts

In the Court of Common Pleas of Clearfield County, Pennsylvania  
Civil Division

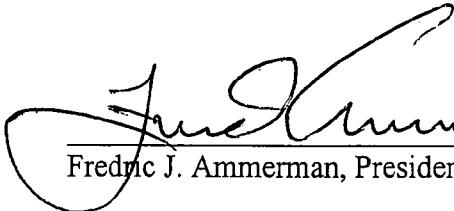
In Re: Inactive Case Dismissal

06-01-MD

NOW, this 3<sup>rd</sup> day of May, 2006, the Court hereby directs the Prothonotary to terminate the following cases for inactivity, per Rule 230.2:

96-0188-CD	00-0793-CD	00-1532-CD
96-1586-CD	00-0799-CD	01-0146-CD
98-1317-CD	00-0822-CD	01-0237-CD
00-0046-CD	00-0823-CD	01-1030-CD
00-0143-CD	00-0992-CD	01-1869-CD
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00-0629-CD	00-1085-CD	02-1610-CD
00-0732-CD	00-1220-CD	03-0091-CD
00-0756-CD	00-1264-CD	03-0138-CD
00-0760-CD	00-1321-CD	03-0172-CD
00-0768-CD	00-1372-CD	03-1148-CD
00-0782-CD	00-1386-CD	03-1176-CD
00-0791-CD	00-1492-CD	

BY THE COURT:

  
Fredric J. Ammerman, President Judge

FILED  
MAY 04 2006  
William A. Shaw  
Prothonotary/Clerk of Courts

1cc CJA

1cc MDJS

Ford, Ireland, Rudella