

00-1133-CD

William Solada vs John Uren

80

00-1133-CD
WILLIAM E. SOLADA -vs- JOHN R. UREN

CERTIFIED COPY

Christopher J. Shaw
Attorney At Law
41 East Main Street
Sykesville, Pennsylvania 15865
(814) 894-2497

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

(p) WILLIAM E. SOLADA,
Plaintiff

VS.

(s) JOHN R. UREN,
Defendant

: No. 00 - 133 - CD
: TYPE OF CASE: Civil Action
: TYPE OF PLEADING: Complaint
: FILED ON BEHALF OF:
: Plaintiff
: COUNSEL OF RECORD FOR THIS
: PARTY:
: CHRISTOPHER J. SHAW
: SUPREME COURT NO. 46836
: 41 East Main Street
: Sykesville, PA 15865
: (814) 894 - 2497

JURY TRIAL DEMANDED

FILED
SEP 13 2000

William A. Shaw
Prothonotary

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

WILLIAM E. SOLADA,
Plaintiff

VS.

: No. 00 - - CD

JOHN R. UREN,
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 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:**

**COURT ADMINISTRATOR
Clearfield County Courthouse
Second & Market Streets
Clearfield, PA 16830
TELEPHONE: (814) 765-2641 Ext. 50-51**

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

WILLIAM E. SOLADA,
Plaintiff

VS. : No. 00 - - CD

JOHN R. UREN,
Defendant

COMPLAINT

AND NOW, comes the Plaintiff, WILLIAM E. SOLADA, by and through his attorney, Christopher J. Shaw, and brings this Complaint against JOHN R. UREN, on a cause of action upon which the following is a statement:

1. WILLIAM E. SOLADA is the Plaintiff of this Complaint, and is an adult individual *sui juris* residing at R.D. #2, Box 177-A, DuBois, Clearfield County, Pennsylvania 15801.
2. JOHN R. UREN is the Defendant of this Complaint, and is an adult individual *sui juris* residing at R.D. #8, Box 51, DuBois, Clearfield County, Pennsylvania 15801 .
3. At all times relevant hereto, Defendant, JOHN R. UREN, was the owner of a certain 1991 Ford Tempo bearing PA Registration PBK-413.
4. Plaintiff, WILLIAM E. SOLADA, is the nephew of the Defendant, JOHN R. UREN, and all times relevant hereto was a co-worker of his uncle.

5. On September 15, 1998, Plaintiff, WILLIAM E. SOLADA, and his uncle, the Defendant, JOHN R. UREN, were working in the Houtzdale area doing contracting type duties.

6. On that day and date, they left work at a location in the Houtzdale area and were proceeding home. Plaintiff, WILLIAM E. SOLADA, was the front seat passenger in his uncle's 1991 Ford Tempo.

7. On September 15, 1998 at approximately 1:20 p.m., The Ford Tempo owned and operated by Defendant, JOHN R. UREN, was traveling North on State Route 153 near the intersection of State Route 153 with State Route 2024 in Boggs Township, Clearfield County Pennsylvania.

8. At all times relevant hereto, a 1988 Pontiac Grand Prix owned and operated by one Robert M. Greenawalt was being operated South on State Route 153 near the intersection of State Route 153 with State Route 2024.

9. A person such as Defendant traveling North on State Route 153 and desiring to proceed West on State Route 2024 have to bear left across the Southbound lane of State Route 153 to reach State Route 2024.

10. Although Defendant, JOHN R. UREN, desired to continue North on State Route 153, as Defendant neared the intersection of State Route 2024, he inadvertently crossed into the Southbound lane of State Route 153 as if he was attempting to turn onto State Route 2024.

11. At such time and place, the right front of Defendant's vehicle struck the front of the 1988 Pontiac Grand Prix operated by Robert Greenawalt which was lawfully being operated within the Southbound lane of travel of State Route 153.

12. As a result of the impact between these vehicles, Plaintiff, WILLIAM E. SOLADA, was made to jar forward into the glove compartment area of Defendant's automobile, a position he had to be extricated from by medical and rescue personnel.

13. As a result of this collision, Plaintiff, WILLIAM E. SOLADA, suffered serious injuries which necessitated medical treatment, physical rehabilitation, surgery to his left knee to repair damage sustained, and which caused a permanent impairment to his left knee including an inability to continue his daily activities due to the damage to his knee.

14. The collision in which Plaintiff, WILLIAM E. SOLADA, sustain his serious injury result from the sole and exclusive negligence of the Defendant, JOHN R. UREN, generally and specifically as follows:

- (a) Failing to operate his vehicle within his lane of travel in violation of 75 Pa.C.S.A. § 3309;
- (b) Being a vehicle turning left across traffic fail to yield to oncoming traffic in violation of 75 Pa.C.S.A. §3322;
- (c) Driving in the left lane of travel in violation of 75 Pa.C.S.A. § 3301;
- (d) Failing to operate his vehicle on the right half of a roadway such that a vehicle could pass to the left of his vehicle in violation of 75 Pa.C.S.A. § 3302;
- (e) Driving on the left side of a roadway in violation of 75 Pa.C.S.A. §3306(a)(1) and (2);
- (f) Failing to observe an oncoming vehicle thereby causing his vehicle to collide into this oncoming vehicle;

(g) Failing to exercise reasonable care in the operation of his vehicle under the circumstances.

15. As a result of the negligence of the Defendant, JOHN R. UREN, in the operation of his motor vehicle, his vehicle collided with the vehicle being lawfully operated by Robert Greenawalt, causing the injuries suffered by Plaintiff, WILLIAM E. SOLADA, a passenger in the Defendant's vehicle.

16. As a result of the negligence of the Defendant, JOHN R. UREN, Plaintiff, WILLIAM E. SOLADA, experienced and continues to experience pain and suffering, was off work for approximately 6 months, underwent surgery to his left knee, and will have accelerated wear to his knee as a result of the injuries he sustained in the accident. Additionally, Plaintiff, who was in the process of obtaining his Professional Bowling privileges, can no longer withstand the rigors placed by bowling numerous games over a short time thereby forever preventing him from bowling in professional tournaments.

17. These damages are in an unliquidated amount in excess of Twenty-Five Thousand (\$25,000.00) Dollars.

WHEREFORE, Plaintiff demands judgment against the Defendant, JOHN R. UREN, in an amount in excess of \$25,000.00 to compensate him for the injuries he sustained caused by the sole and exclusive negligence of the Plaintiff as set forth herein.

JURY TRIAL DEMANDED.

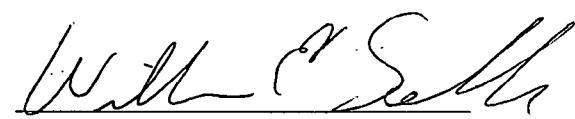
Christopher J. Shaw

Christopher J. Shaw, Esquire
Attorney for Plaintiff

VERIFICATION

I, WILLIAM E. SOLADA, the Plaintiff therein, verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

Dated: 9-13-00



William E. Solada

FILED

012:KSP1
SEP 13 2000

William A. Shaw
Prothonotary
30cts Att.

80⁰⁰
pd by Shaw

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

WILLIAM E. SOLADA,

Plaintiff,

v.

JOHN R. UREN,

Defendant.

: No. 00-1133-C.D.

: TYPE OF PLEADING:
**PRAECIPE FOR ENTRY OF
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

SEP 22 2000

William A. Shaw
Prothonotary

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

WILLIAM E. SOLADA,

: No. 00-1133-C.D.

Plaintiff,

v.

JOHN R. UREN,

Defendant.

PRAECIPE FOR ENTRY OF APPEARANCE

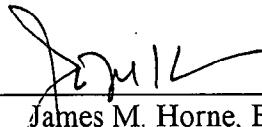
TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, JOHN R. UREN, in the above-captioned matter.

We are authorized to accept service on his behalf.

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

Dated: September 21, 2000

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

WILLIAM E. SOLADA,

No. 00-1133-C.D.

Plaintiff,

v.

JOHN R. UREN,

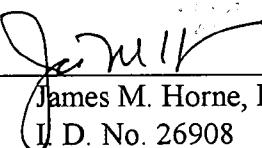
Defendant.

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. 1st Class Mail, postage prepaid, on this 21st day of September, 2000, to the attorney of record:

Christopher J. Shaw, Esquire
41 East Main Street
Sykesville, PA 15865
(814) 894-2497

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

By: 

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

FILED

SEP 22 2000
M 1143 NOCC
William A. Shaver
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10175

SOLADA, WILLIAM E.

00-1133-CD

VS.

UREN, JOHN R.

COMPLAINT

SHERIFF RETURNS

NOW SEPTEMBER 19, 2000 AT 11:18 AM DST SERVED THE WITHIN COMPLAINT ON JOHN R. UREN, DEFENDANT AT RESIDENCE RD 8 BOX 51, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO FLORENCE UREN, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: McCLEARY/NEVLING

Return Costs

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

Sworn to Before Me This

21 Day Of October, 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
Chester A. Hawkins
Sheriff

FILED

OCT 09 2000
01340
William A. Shaw
Prothonotary



627-9

OFFICE OF COURT ADMINISTRATOR
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA

COPY

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

FILED

NOV 10 2005
JS

William A. Shaw
Prothonotary/Clerk of Courts

RE: 00-1133-CD
William E. Solada
Vs.
John R. Uren

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,
David S. Meholick

David S. Meholick
Court Administrator



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: 00-1133-CD
William E. Solada
Vs.
John R. Uren

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. Meholick".

David S. Meholick
Court Administrator

Court of Common Pleas of Clearfield County, Pennsylvania
Civil Division

William E. Solada

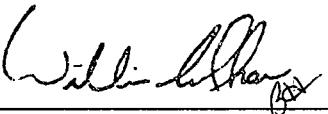
Vs.

00-1133-CD

John R. Uren

Termination of Inactive Case

This case is hereby terminated with prejudice
this 17th day of January, 2006, as per Rule 230.2.



William A. Shaw
Prothonotary

FILED

JAN 17 2006

William A. Shaw
Prothonotary/Clerk of Courts