

00-1334-CD
WENDY REITZ -vs- GARY MODERALLI

Hindman Law Office

194 Main Street, Brookville, Pennsylvania 15825
814-849-4788 • 814-849-4556

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

105

WENDY REITZ,

Plaintiff

v.

114

GARY MODERALLI,

Defendant

CIVIL ACTION - LAW

No. 00-1334-00

Type of Pleading: COMPLAINT

Filed on behalf of: Plaintiff

Counsel of Record for this Party:
Blair H. Hindman, Esquire
Supreme Court No. 81503
194 Main Street
Brookville, PA 15825
(814) 849-4788

FILED

OCT 27 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

v.

No.

GARY MODERALLI,

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.

DAVE MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,	:	CIVIL ACTION – LAW
Plaintiff	:	
	:	
v.	:	No.
	:	
GARY MODERALLI,	:	
Defendant	:	

COMPLAINT

AND NOW, come the Plaintiff, Wendy Reitz by and through her attorney,
Blair H. Hindman, Esquire, and files the following Complaint:

1. Plaintiff, Wendy Reitz, is an adult individual whose current address is
82 Samaritan Avenue, Apt. 12A, Ashland, Ohio 44805.
2. Defendant, Gary Moderalli, is an adult individual whose last known
address 1945 Walker Mill Road, Youngstown, Ohio 44514, and was
driving a vehicle owned by the Defendant at the time of said accident.
3. The facts and occurrences hereinafter related took place on or about
January 1, 1999, at approximately 10:30 a.m. upon State Road 255.
4. At the above-referenced time and place, Plaintiff Wendy Reitz was
operating her motor vehicle North along State Road 255.
5. Directly behind Plaintiff was the Defendant, Gary Moderalli, who was
operating his vehicle North along State Road 255. Plaintiff activated
her left turn signal and preceded to slow down to complete a left hand
turn off of State Road 255. Defendant failed to have his vehicle under
control and failed to see Plaintiff's left turn signal flashing and working

properly. Defendant's vehicle hit the back end of the Plaintiff's vehicle forcing Plaintiff's vehicle to turn around and hit the Defendant's vehicle in the front end.

6. Plaintiff was wearing her seat belt at the time of the accident.
7. Plaintiff suffered serious injuries as a result of Defendant's negligence including but not limited to back injuries, neck injuries, trauma and substantial pain and suffering.
8. The aforementioned accident and all injuries and damages set forth hereinafter, were sustained by Plaintiff, Wendy Reitz, as a direct and proximate result of the negligent, careless, wanton and reckless manner in which the Defendant, Gary Moderalli, operated his vehicle as follows:

- (A) Failure to have his vehicle under proper control as to avoid an accident;
- (B) Failure to keep alert and maintain a proper watch for the presence of other motor vehicles present on the roadway;
- (C) Failure to apply his brakes in a sufficient time to avoid a collision;
- (D) Failure to travel at a safe speed;
- (E) Failure to drive his vehicle with due regard for the highway and traffic conditions which were existing, and of which he was or should have been aware;

(F) Failure to keep proper and adequate control over his vehicle;
and

(G) Driving his vehicle in a manner endangering persons and
property, and in a reckless manner with careless disregard to
the rights and safety of others and in violation of the Motor
Vehicle Code of the Commonwealth of Pennsylvania.

9. Plaintiff, Wendy Reitz, sustained painful and severe injuries which
include, but are not limited to:

(A) Pain in her back

(B) Pain in her neck

(C) Decreased movement of her head to the right and left

(D) Sleeplessness

(E) Loss of enjoyment of pleasures of life

10. By reason of the aforementioned injuries sustained by Plaintiff, she
was forced to incur liability for medical treatment, medications, and
other miscellaneous expenses in an effort to restore herself to health
and claim is made therefore.

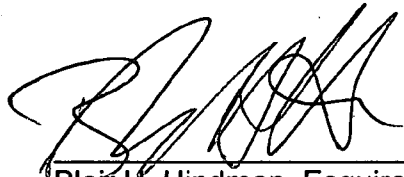
11. Because of the nature of his injuries, Plaintiff, Wendy Reitz, has been
advised and therefore avers that she may be forced to incur similar
expenses in the future and claim is made therefore.

12. By reason of the aforementioned injuries, Plaintiff has been reduced to
working part-time work (20 hours a week) at her occupation and has

suffered economic loss in the form of lost wages, benefits, and other compensation.

13. As a result of the aforementioned injuries, Plaintiff, Wendy Reitz, has undergone and in the future will undergo physical suffering and claim is made therefore.

WHEREFORE, Plaintiff, Wendy Reitz, demands judgment in excess of \$25,000.00 in her favor, exclusive of interest and costs, and in excess of any jurisdictional amount requiring compulsory arbitration. JURY TRIAL DEMANDED.

A handwritten signature in black ink, appearing to read 'Blair H. Hindman', is written over a horizontal line.

Blair H. Hindman, Esquire
Attorney for Plaintiff

AFFIDAVIT OF COUNSEL'S SUBSTITUTIONARY VERIFICATION

I, BLAIR H. HINDMAN, LEGAL COUNSEL AND ATTORNEY FOR THE PLAINTIFF, hereby represent that because of the Plaintiff's unavailability, I am signing this Affidavit, hereby certifying that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

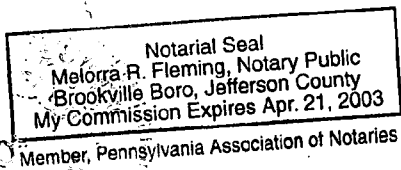
Date:

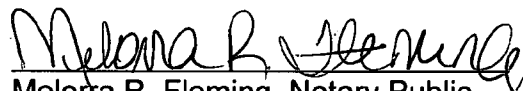
10/25/00


BLAIR H. HINDMAN, ESQUIRE

COMMONWEALTH OF PENNSYLVANIA:
CONTY OF JEFFERSON:

I, Melorra R. Fleming, notary public, hereby certify that Blair H. Hindman, Esquire, known by me and having presented identification to prove his identity, signed the foregoing document for the purposes stated.




Melorra R. Fleming, Notary Public

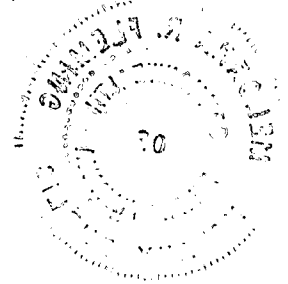
FILED

OCT 27 2000
DOUGLAS
William A. Shaw
Prothonotary

Handman

PD \$80.00.

See atty Handman



IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,
Plaintiff

v.

GARY MODERALLI,
Defendant

CIVIL ACTION – LAW

1334
No. 00-4434 CD

CERTIFICATE OF SERVICE

I, Melorra R. Fleming, assistant to Blair H. Hindman, Esquire, attorney for the Plaintiff, do hereby certify that a true and correct copy of the foregoing Complaint has been served upon the Defendant Gary Moderalli, on this 31st day of October, 2000, via regular first class mail, United States Postal Service, postage prepaid, as well as Certified Mail, to the following address:

Gary Moderalli
1945 Walker Mill Road
Youngstown, OH 44514

FILED

CERTIFIED MAIL NUMBER: Z 560 216 897

NOV 02 2000

William A. Shaw
Prothonotary

Date: 10/31/00

Melorra R. Fleming
Melorra R. Fleming
Assistant to Blair H. Hindman, Esq.

FILED

NOV 02 2000

Prothonotary

William A. Shaw

Henderson

Hindman Law Office

194 Main Street, Brookville, Pennsylvania 15825
814-849-4788 • 814-849-4556

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

vs.

GARY MODERALLI,

Defendant

: TYPE OF CASE:

: Civil Action - Law

: No. 00-1134-CD

: Type of Pleading: 10-Day Notice

: Filed on Behalf of:

: Wendy Reitz, Plaintiff

: Counsel of Record for this Party:

: BLAIR H. HINDMAN, ESQ

: Supreme Court I.D. #81503

: 194 Main Street

: Brookville, PA 15825

: (814) 849-4788

FILED

DEC 04 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

v.

GARY MODERALLI,

Defendant

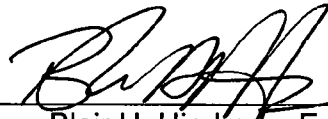
No. 00-1134 CD

TEN DAY NOTICE

YOU ARE HEREBY IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN THE TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

DAVE MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKERT STREET
CLEARFIELD, PA 16830
814-765-2641

BY



Blair H. Hindman, Esquire
Attorney for Plaintiff

LAW OFFICES

POST & SCHELL, P.C.

1857 WILLIAM PENN WAY • SUITE 101 • P.O. Box 10248
LANCASTER, PENNSYLVANIA 17605-0248

(717) 291-4532

POST & SCHELL, P.C.

BY: PAUL W. GREGO, ESQUIRE

I.D. # 39701

1857 WILLIAM PENN WAY

P.O. BOX 10248

LANCASTER, PA 17605-0248

(717) 291-4532

ATTORNEYS FOR DEFENDANT

WENDY REITZ

Plaintiff,

v.

GARY MODERALLI

Defendant.

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

JURY TRIAL DEMANDED

NO. 00-1334-CO

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance on behalf of Defendant, Gary Moderalli, in the above-captioned matter.

POST & SCHELL, P.C.

BY:


PAUL W. GREGO, ESQUIRE
Attorney for Defendant

FILED

DEC 04 2000

William A. Shaw
Prothonotary

CERTIFICATE OF SERVICE

I, Sandra Morales, an employee of the law offices of Post & Schell, P.C., do hereby certify that on the date set forth below, I did serve a true and correct copy of the foregoing document upon the following person(s) at the following address(es) by sending same in the United States mail, first-class, postage prepaid:

Blair H. Hindman, Esquire
194 Main Street, Suite #4
Brookville, PA 15825



SANDRA MORALES

DATE: 11/30/00

FILED

DEC 04 2000
m 11:42 AM
William A. Shaw
Prothonotary

Res

LAW OFFICES

POST & SCHELL, P.C.

1857 WILLIAM PENN WAY • SUITE 101 • P.O. Box 10248
LANCASTER, PENNSYLVANIA 17605-0248

(717) 291-4532

POST & SCHELL, P.C.

BY: PAUL W. GREGO, ESQUIRE

I.D. # 39701

1857 WILLIAM PENN WAY

P.O. BOX 10248

LANCASTER, PA 17605-0248

(717) 291-4532

ATTORNEYS FOR DEFENDANT

WENDY REITZ

Plaintiff,

v.

GARY MODERALLI

Defendant.

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

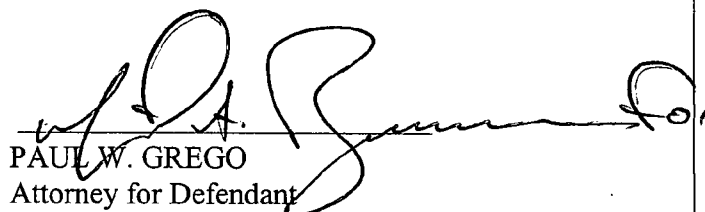
JURY TRIAL DEMANDED

NO. 00-1334-CO

NOTICE TO PLEAD

TO: **ALL PARTIES**

YOU ARE HEREBY NOTIFIED to plead to the within Answer and New Matter within
twenty (20) days of service thereof or a default may be entered against you.


PAUL W. GREGO
Attorney for Defendant

FILED

DEC 26 2000

William A. Shaw
Prothonotary

POST & SCHELL, P.C.

BY: PAUL W. GREGO, ESQUIRE

I.D. # 39701

1857 WILLIAM PENN WAY

P.O. BOX 10248

LANCASTER, PA 17605-0248

(717) 291-4532

ATTORNEYS FOR DEFENDANT

WENDY REITZ

Plaintiff,

v.

GARY MODERALLI

Defendant.

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

JURY TRIAL DEMANDED

NO. 00-1334-CO

ANSWER AND NEW MATTER OF DEFENDANT

NOW INTO COURT, through undersigned counsel, comes the Defendant, who, in answer to the Complaint of the Plaintiff, respectfully represents that:

1. Defendant, pursuant to Pennsylvania Rules of Civil Procedure 1029(e), hereby generally denies the allegations of the Complaint except to admit the allegations of paragraph 2.

WHEREFORE, Defendant, Gary Moderalli, prays that the Complaint be dismissed, at the cost of the Plaintiffs.

NEW MATTER

2. The Plaintiff may have failed to state a cause of action upon which relief can be granted.

3. The applicable Statute of Limitations may have expired prior to the institution of this action.

4. Answering Defendant was not negligent.

5. Any acts or omission of answering Defendant alleged to constitute negligence were not substantial causes or factors of the subject incident and/or did not result in the injuries and/or losses alleged by the Plaintiff.

6. The incident and/or damages described in Plaintiff's Complaint may have been caused or contributed to by the Plaintiff.

7. The negligent acts or omissions of other individuals and/or entities may have constituted intervening superseding causes of the damages and/or injuries alleged to have been sustained by the Plaintiff.

8. The Plaintiff may have assumed the risk. The Plaintiff may have been contributorily negligent.

9. The incident, injuries and/or damages alleged to have been sustained by the Plaintiff were not proximately caused by answering Defendant.

10. Plaintiff may not have properly mitigated her damages.

11. Plaintiff's recovery in this case, if any, is limited by the provisions of 75 Pa. C.S.A. Sections 1720 and 1722.

WHEREFORE, Defendant, Gary Moderalli, prays that the Complaint be dismissed, at the cost of the Plaintiff.

POST & SCHELL, P.C.

BY: 

PAUL W. GREGO, ESQUIRE
Attorney for Defendant 

VERIFICATION

I, PAUL W. GREGO, ESQUIRE, hereby state that I am the attorney for Defendant, in this action and verify that the statements made in the foregoing document(s) are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S., Section 4904, relating to the unsworn falsification to authorities. Counsel is making this verification because defendant is outside the jurisdiction of the court and of time constraints in the filing of this pleading.

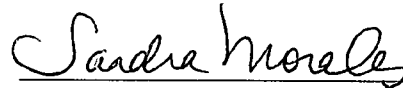

PAUL W. GREGO, ESQUIRE

DATE: 12/21/00

CERTIFICATE OF SERVICE

I, Sandra Morales, an employee of the law offices of Post & Schell, P.C., do hereby certify that on the date set forth below, I did serve a true and correct copy of the foregoing document upon the following person(s) at the following address(es) by sending same in the United States mail, first-class, postage prepaid:

Blair H. Hindman, Esquire
194 Main Street, Suite #4
Brookville, PA 15825



SANDRA MORALES

DATE: 12/21/00

FILED

DEC 26 2000

m / 11:45 / Mr
William A. Shaw
Prothonotary

NO CERT COPIES

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LAW OFFICES

POST & SCHELL, P.C.

1857 WILLIAM PENN WAY • SUITE 101 • P.O. Box 10248

LANCASTER, PENNSYLVANIA 17605-0248

(717) 391-4532

POST & SCHELL, P.C.

BY: PAUL W. GREGO, ESQUIRE

I.D. # 39701

1857 WILLIAM PENN WAY

P.O. BOX 10248

LANCASTER, PA 17605-0248

(717) 291-4532

ATTORNEYS FOR DEFENDANT

WENDY REITZ

Plaintiff,

v.

GARY MODERALLI

Defendant.

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

JURY TRIAL DEMANDED

NO. 00-1334-CO

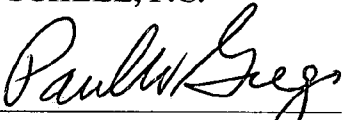
PRAECIPE TO SUBSTITUTE VERIFICATION

TO THE PROTHONOTARY:

Kindly substitute the attached Verification of Defendant, Gary Moderalli, for the Verification of Paul W. Grego, Esquire to the Answer and New Matter of Defendant which was filed in the above-captioned matter.

POST & SCHELL, P.C.

BY:


PAUL W. GREGO, ESQUIRE
Attorney for Defendant

FILED

JAN 08 2001

William A. Shaw
Prothonotary

Re: Reitz v. Moderalli

VERIFICATION

I, Gary Moderalli, hereby verify that the statements made in the foregoing pleading are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S., Section 4909, relating to unsworn falsification to authorities.


GARY MODERALLI

DATE: 12-28-00

DEPT

12-28-00

CERTIFICATE OF SERVICE

I, Sandra Morales, an employee of the law offices of Post & Schell, P.C., do hereby certify that on the date set forth below, I did serve a true and correct copy of the foregoing document upon the following person(s) at the following address(es) by sending same in the United States mail, first-class, postage prepaid:

Blair H. Hindman, Esquire
194 Main Street, Suite #4
Brookville, PA 15825



SANDRA MORALES

DATE: 1/4/01

IN RE: [illegible]

FILED
JAN 10 2001
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

FILED
JAN 08 2001
11:19 AM
William A. Shaw
Prothonotary
[Signature]

U.S. DISTRICT COURT

U.S. DISTRICT COURT

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

v.

GARY MODERALLI,

Defendant

: CIVIL ACTION – LAW

: No. 00-1334-CO

: Type of Pleading: ANSWER to NEW MATTER

: Filed on behalf of: Plaintiff

: Counsel of Record for this Party:

Blair H. Hindman, Esquire

Supreme Court No. 81503

194 Main Street

Brookville, PA 15825

(814) 849-4788

FILED

JAN 10 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

v.

No. 00-1334-CO

GARY MODERALLI,

Defendant

ANSWER TO DEFENDANT'S
NEW MATTER

AND NOW, comes the Plaintiff, Wendy Reitz by and through her attorney,
Blair H. Hindman, Esquire, and files the following Answer to Defendant's New
Matter:

1. This is a legal conclusion and no response is necessary.
2. Denied. Plaintiff asserts that they have stated a cause of action upon
which Relief may be granted.
3. Denied. The Statute of Limitations has not expired prior to the
institution of this action.
4. Denied. To the contrary, Defendant was negligent when Defendant
collided with the rear portion of Plaintiff's vehicle while Plaintiff was
sitting stationery with her turn signal activated waiting to make a legal
turn.
5. Denied. To the contrary, Defendant's negligence was the sole cause
of the accident that resulted in injuries and/or losses to the Plaintiff.
6. Denied. The accident was not caused by Plaintiff nor is Plaintiff
responsible for any contributory negligence.

7. Denied. There were no negligent acts or admissions of any other individuals or entities, which could constitute intervening or superseding causes that resulted in damage and/or injuries to the Plaintiff.
8. Plaintiff asserts that the "assumption of the risk" language is a legal conclusion and no affirmative or negative response is necessary. As to the second sentence in Paragraph 8, Plaintiff denies any contributory negligence.
9. Denied. To the contrary, Defendant's actions were the proximate cause of the accident involving Plaintiff and Defendant which caused injury to Plaintiff.
10. Denied. Plaintiff has continuously mitigated her damages in seeking medical attention and taking all other reasonable steps to limit damage.
11. Denied. Plaintiff's recovery in this instance is not limited by 75 Pa. C.S.A. §§1720 and 1722. No subrogation issue exists and Plaintiff had full tort coverage at time of said accident.

WHEREFORE, Plaintiff, Wendy Reitz, requests this Court dismiss Defendant's New Matter at the cost of the Defendant.



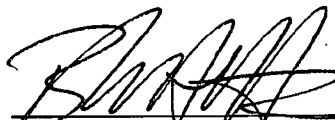
Blair H. Hindman, Esquire
Attorney for Plaintiff

VERIFICATION

I, BLAIR H. HINDMAN, ESQUIRE, hereby state that I am the attorney for Plaintiff, in this action and verify that the statements made in the foregoing document(s) are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities. Counsel is making this verification because Plaintiff is outside the jurisdiction of the Court and of time constraints in the filing of this Pleading.

Date:

1/08/01



BLAIR H. HINDMAN, ESQUIRE

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,

Plaintiff

CIVIL ACTION – LAW

v.

No. 00-1134 CD

GARY MODERALLI,

Defendant

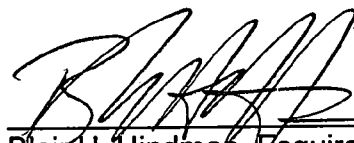
CERTIFICATE OF SERVICE

I, Blair H. Hindman, Esquire, attorney for the Plaintiff, do hereby certify that a true and correct copy of the foregoing Answer to New Matter has been served upon Defense Counsel on this 9th day of January 2001, via regular first class mail, United States Postal Service, postage prepaid, to the following address:

Paul W. Grego, Esquire
1857 William Penn Way
PO Box 10248
Lancaster, PA 17605-0248

Date:

1/08/01



Blair H. Hindman, Esquire
Attorney for Plaintiff

FILED

JAN 10 2001

11:29 AM
William A. Shaw
Prothonotary

624

00-1334-00


CERTIFICATE OF SERVICE

I, Blair Hindman, hereby certify that a true copy of the foregoing
Interrogatories was served via First Class Regular Mail, postage prepaid,
upon Defendant's Attorney, Paul W. Grego, to the following address on this
day, October 10, 2001:

Paul W. Grego, Esquire
1857 William Penn Way
P.O. Box 10248
Lancaster, PA 17605-0248


Blair H. Hindman, Esquire

FILED

 **OCT 12 2001**
mll/or/noc
William A. Shaw
Prothonotary

LAW OFFICES
ALEXANDER, GARBARINO, NEELY & HINDMAN, L.L.P.

CLARION OFFICE

415 Wood Street • P.O. Box 766
Clarion, PA 16214
814-226-6030
814-226-5018 (fax)
email: agksn@penn.com

JAMES B. ALEXANDER
CASSANDRA M. NEELY
BLAIR H. HINDMAN

Of Counsel
G. BARRETT GARBARINO

BROOKVILLE OFFICE

194 Main Street, Suite #4
Brookville, PA 15825
814-849-4788
(fax) 814-849-4556

October 10, 2001

Prothonotary's Office
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830

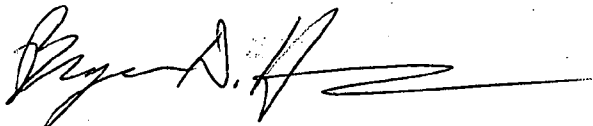
Re: Reitz v. Moderalli, NO. CIV. - 00-1334-CD

TO THE PROTHONOTARY:

Please file in the list of docket entries that we served Interrogatories on the Defendant, Gary Moderalli, on October 10, 2001.

If you have any questions or concerns, please contact me at our office at your earliest convenience. Thank you for your time.

Sincerely,



BRYAN D. HUWAR

BDH/bdh

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

WENDY REITZ,
Plaintiff

v.

GARY MODERALLI,
Defendant

Civil Action - Law

No. 00-1334-CD

Type of Pleading: PRAECIPE
TO DISCONTINUE ACTION

Filed on behalf of: Plaintiff

Counsel of Record for this Party:
Blair H. Hindman, Esquire
Alexander, Garbarino, Neely &
Hindman

194 Main Street
Brookville, PA 15825
(814) 849-4788
Supreme Court No.: 81503

FILED

DEC 31 2001

11/3:31 p.m.
William A. Shaw
Prothonotary

h o c c

Copy of Certificate to CA
Certificate to atty
discontinuation.

COPY

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Wendy Reitz

Vs.

No. 2000-01334-CD

Gary Moderalli

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 this 31st day of December, 2001 marked:

Discontinued

Record costs in the sum of \$80.00 have been paid in full by Attorney.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 31st day of December A.D. 2001.

William A. Shaw, Prothonotary