

00-1526-CD
THE TICONUM COMPANY -vs- CLEARFIELD DENTAL ARTS, LTD.

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

THE TICONIUM COMPANY,

Plaintiff : No. 00-1526-CO
: Type of Pleading: Praeclipe to Enter
: Judgment
: Filed on Behalf of: Plaintiff
: Counsel of Record:
: Robert A. Mix, Esq.
: Lee, Martin, Green & Reiter, Inc.
: I.D. #16164
: 115 E. High Street
: Lock Drawer 179
: Bellefonte, PA 16823
: 814-355-4769

CLEARFIELD DENTAL ARTS, LTD.,

Defendant

FILED

DEC 08 2000

William A. Shaw
Prothonotary

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

THE TICONIUM COMPANY, :
Plaintiff :
:
vs. : No.
:
CLEARFIELD DENTAL ARTS, LTD., :
Defendant :
:

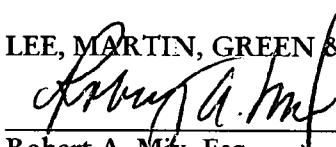
PRAECIPE

TO THE PROTHONOTARY:

No appeal having been timely filed from the judgment entered by District Justice Richard Ireland on October 23, 2000 in favor of Plaintiff and against Defendant in the amount of \$1,553.59, please enter said judgment in the Court of Common Pleas of Clearfield County, Pennsylvania. A certified copy of the record of the proceeding before District Justice Richard Ireland is attached hereto.

LEE, MARTIN, GREEN & REITER, INC.

By:


Robert A. Mix, Esq.

I.D. #16164

Attorney for Plaintiff
115 E. High Street
P.O. Box 179
Bellefonte, PA 16823
814-355-4769

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-02

DJ Name: Hon.

RICHARD A. IRELAND
Address: **650 LEONARD STREET**
CLEARFIELD, PA

Telephone: **(814) 765-5335** **16830**

RICHARD A. IRELAND
650 LEONARD STREET
CLEARFIELD, PA 16830

NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

PLAINTIFF: **NAME and ADDRESS**

THE TICONIUM COMPANY
PO BOX 179
BELLEFONTE, PA 16823

VS.

DEFENDANT: **NAME and ADDRESS**

CLEARFIELD DENTAL ARTS, LTD
508 KREBS AVE
CLEARFIELD, PA 16830

Docket No.: **CV-0000451-00**
Date Filed: **9/14/00**



THIS IS TO NOTIFY YOU THAT:

Judgment:

DEFAULT JUDGMENT PLATE **00-1526-CO**

Judgment was entered for: (Name) **THE TICONIUM COMPANY**

Judgment was entered against: (Name) **CLEARFIELD DENTAL ARTS, LTD**

in the amount of \$ **1,553.59** on: (Date of Judgment) **10/23/00**

Defendants are jointly and severally liable. (Date & Time) _____

Damages will be assessed on: _____

This case dismissed without prejudice. _____

Amount of Judgment Subject to Attachment/Act 5 of 1996 \$ _____

Levy is stayed for _____ days or generally stayed. _____

Objection to levy has been filed and hearing will be held: _____

| | |
|--|--------------------|
| Amount of Judgment | \$ 1,497.59 |
| Judgment Costs | \$ 56.00 |
| Interest on Judgment | \$.00 |
| Attorney Fees | \$.00 |
| Total | \$ 1,553.59 |
| Post Judgment Credits | \$ _____ |
| Post Judgment Costs | \$ _____ |
| Certified Judgment Total \$ _____ | |

| | |
|-------|--------|
| Date: | Place: |
| Time: | |

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

10-23-00 Date *R. Durel*, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

11-30-00 Date *R. Durel*, District Justice

My commission expires first Monday of January,

2006

SEAL

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

THE TICONIUM COMPANY,

Plaintiff

vs.

:

: No.

CLEARFIELD DENTAL ARTS, INC.,

Defendant

:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Praeclipe was deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania, on the 7th day of December, 2000 addressed to the following:

Clearfield Dental Arts, Inc.
508 Krebs Avenue
Clearfield, PA 16830



Robert A. Mix, Esq.

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

THE TICONIUM COMPANY,

Plaintiff

COPY

vs.

: No. 00-1526-CJ

CLEARFIELD DENTAL ARTS, LTD.,

Defendant

NOTICE OF ENTRY OF JUDGMENT

To: Clearfield Dental Arts, Ltd.

Pursuant to Rule 236, you are hereby notified that a judgment has been entered against you in the above-captioned proceeding.



Prothonotary

Dated: 10-8-00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COPY

The Ticonium Company
Plaintiff(s)

No.: 2000-01526-CD

Real Debt: \$1,553.59

Atty's Comm:

Vs. Costs: \$

Int. From:

Clearfield Dental Arts, LTD
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: December 8, 2000

Expires: December 8, 2005

Certified from the record this 8th day of December, 2000

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

FILED

REC'D DEC 08 2009
11:46 AM
CITY OF NEW YORK
William A. Shaw
Prothonotary
\$20.00

100-1000
Statement to City, NY

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

THE TICONIUM COMPANY,

Plaintiff : No. 00-1526-CO

vs.

: Type of Pleading: Notice of Service of
: Interrogatories in Aid of Execution

CLEARFIELD DENTAL ARTS, LTD.,

Defendant : Filed on Behalf of: Plaintiff

: Counsel of Record:
: Robert A. Mix, Esq.
: Lee, Martin, Green & Reiter, Inc.
: I.D. #16164
: 115 E. High Street
: Lock Drawer 179
: Bellefonte, PA 16823
: 814-355-4769

FILED

DEC 08 2000

William A. Shaw
Prothonotary

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

THE TICONIUM COMPANY,

Plaintiff :

vs.

: No.

CLEARFIELD DENTAL ARTS, LTD.,

Defendant :

NOTICE OF SERVICE OF INTERROGATORIES

TO THE PROTHONOTARY:

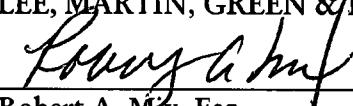
You are hereby notified that on December 7, 2000, original

Interrogatories in Aid of Execution were mailed by First Class Mail, Postage Prepaid, upon the following Defendant.

Clearfield Dental Arts, Inc.
508 Krebs Avenue
Clearfield, PA 16830

LEE, MARTIN, GREEN & REITER, INC.

By:


Robert A. Mix, Esq.

I.D. #16164

Attorney for Plaintiff
115 E. High Street
P.O. Box 179
Bellefonte, PA 16823
814-355-4769

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

THE TICONIUM COMPANY,

Plaintiff :
:
:
vs. : No. 00-1526-00
:
:

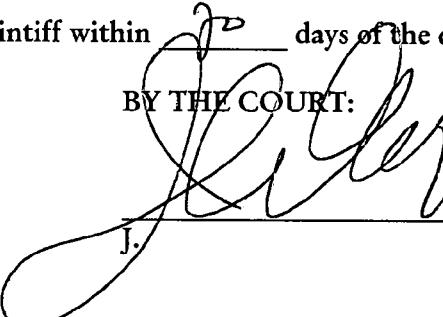
CLEARFIELD DENTAL ARTS, LTD.,

Defendant :
:

ORDER

AND NOW, this 14th day of January, 2001, after consideration
of Plaintiff's Motion to Compel Discovery, Defendant is hereby Ordered to serve Answers to
Interrogatories in Aid of Execution on Plaintiff within 10 days of the date of this Order.

BY THE COURT:



J.

FILED

JAN 17 2001

William A. Shaw
Prothonotary

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

THE TICONIUM COMPANY,

Plaintiff : No. 00-1526-CD
: Type of Pleading: Motion to Compel
: Discovery
: Filed on Behalf of: Plaintiff
: Counsel of Record:
: Robert A. Mix, Esq.
: Lee, Martin, Green & Reiter, Inc.
: I.D. #16164
: 115 E. High Street
: Lock Drawer 179
: Bellefonte, PA 16823
: 814-355-4769

CLEARFIELD DENTAL ARTS, LTD.,

Defendant

vs.

FILED

JAN 15 2001

William A. Shaw
Prothonotary

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

THE TICONIUM COMPANY, :
Plaintiff :
:
vs. : No. 00-1526-00
CLEARFIELD DENTAL ARTS, LTD., :
Defendant :
:

MOTION TO COMPEL DISCOVERY

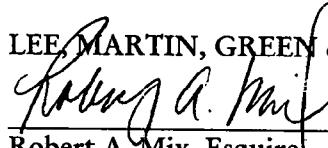
NOW COMES Plaintiff The Ticonium Company by its attorneys, Lee, Martin, Green & Reiter, Inc., and respectfully represents:

1. On December 8, 2000, a judgment in the amount of \$1,553.59 in favor of Plaintiff and against Defendant was entered in the Court of Common Pleas of Clearfield County, Pennsylvania.
2. On December 7, 2000, Plaintiff filed and served Interrogatories in Aid of Execution on Defendant. True and correct copies of said Interrogatories in Aid of Execution are attached hereto, incorporated herein and marked Exhibit "A".
3. To date of filing of this Motion to Compel Discovery, Defendant has not filed and served Answers to said Interrogatories in Aid of Execution, nor has it filed objections thereto.
4. To date of filing this Motion to Compel Discovery, Defendant has not requested an extension of time for the filing and service of said Answers to Interrogatories in Aid of Execution, nor has an extension otherwise been granted.
5. Defendant has failed to file and serve Answers to said Interrogatories in Aid of Execution in compliance with the Pennsylvania Rules of Civil Procedure.

WHEREFORE, Plaintiff respectfully requests Your Honorable Court to issue an Order compelling Defendant to file and serve Answers to said Interrogatories in Aid of Execution within twenty days or such other period of time as the Court may deem appropriate.

LEE, MARTIN, GREEN & REITER, INC.

By:


Robert A. Mix, Esquire

I.D. #16164

Attorney for Plaintiff
115 E. High Street
Lock Drawer 179
Bellefonte, PA 16823
814-355-4769

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

THE TICONIUM COMPANY,

Plaintiff :
: No.
: Type of Pleading: Interrogatories in Aid of
: Execution
: Filed on Behalf of: Plaintiff
: Counsel of Record:
: Robert A. Mix, Esq.
: Lee, Martin, Green & Reiter, Inc.
: I.D. #16164
: 115 E. High Street
: Lock Drawer 179
: Bellefonte, PA 16823
: 814-355-4769

vs.

CLEARFIELD DENTAL ARTS, LTD.,

Defendant



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

THE TICONIUM COMPANY,

Plaintiff :

vs.

: No.

CLEARFIELD DENTAL ARTS, LTD.,

Defendant :

INTERROGATORIES IN AID OF EXECUTION

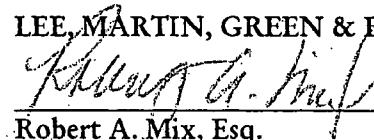
To: Clearfield Dental Arts, Ltd.

Pursuant to Pennsylvania Rules of Civil Procedure 4006, et seq., the Plaintiff by its attorneys, Lee, Martin, Green & Reiter, Inc., files upon Defendant Interrogatories and demands that it file full, complete and verified written answers thereto within thirty (30) days after the date of service hereof, pursuant to the Pennsylvania Rules of Civil Procedure No. 4006. In accordance with said rule, any objections shall be signed by the attorney making them.

These Interrogatories are continuing and require supplemental answers under oath if the Defendant, its attorney or representative, obtain any additional information requested in these Interrogatories prior to the time of trial.

LEE, MARTIN, GREEN & REITER, INC.

By:


Robert A. Mix, Esq.

I.D. #16164

Attorney for Plaintiff

115 E. High Street

P.O. Box 179

Bellefonte, PA 16823

814-355-4769

INSTRUCTIONS FOR ANSWERING INTERROGATORIES

- A. In accordance with Pa. R.C.P. No. 4005, original written Interrogatories have been served upon you to be answered by the party served or, if the party served is a public or private corporation or similar entity or a partnership or association, by any officer or agent, who shall furnish such information as is available to the party.
- B. In accordance with Pa. R.C.P. No. 4006, written answers shall be inserted in the spaces provided in the Interrogatories. If there is insufficient space to answer an Interrogatory, the remainder of the answer shall follow on a supplemental sheet.
- C. In accordance with Pa. R.C.P. No. 4006(b), a sufficient answer to such an Interrogatory shall be to specify the records from which the answer may be derived or ascertained.
- D. Please return these original Interrogatories to our office with inserted answers.
- E. For purposes of these Interrogatories, the following definitions shall apply:
 1. "Document" means any written, recorded or graphic matter, however produced or reproduced.
 2. "Identify" or "identification" when used in reference to an individual person means to state his name, present or last known address, present or last known position and business affiliation and his position and business affiliations at all times during the period covered by the Complaint.
 3. "Describe" or "identify" when used in reference to a document means to state the type of document (for example, letter, memorandum, telegram, chart, etc.), the date, author, addresses, title file and identifying number and symbol, and the name and address of its custodian. If any such documents are no longer in your possession or subject to your control, state what disposition was made of it and the date thereof.

1. **REAL ESTATE:** Does Clearfield Dental Arts, Inc. have an ownership or interest in any real estate anywhere in the United States?

If so, set forth a brief description thereof, include the structure and lot size and type of construction; the volume and page number of the official record thereof; and whether Clearfield Dental Arts, Inc. owns it solely or together with any other person or persons and give their full names and addresses. If any of the above properties are mortgaged, supply the names and addresses of lenders, the date and amount of the mortgage, where it is recorded, the monthly payments and the balance now due.

ANSWER:

2. AGREEMENTS: State whether Clearfield Dental Arts, Inc. has any agreements involving the purchase of any real estate anywhere in the United States. If so, state with whom this agreement is made, and state whether or not any persons are joined with Clearfield Dental Arts, Inc. in the agreement. Supply full names and addresses of all parties concerned. If the said agreement is recorded, provide the state and county of recordation, volume and page numbers.

ANSWER:

3. MORTGAGES: State whether Clearfield Dental Arts, Inc. owns any mortgages against any real estate owned by another person in the United States. If so, state whether or not Clearfield Dental Arts, Inc. owns this mortgage with any other person or persons and, if so, supply their full name and address. State further the names and addresses of all borrowers and the state and county where said mortgage is recorded together with the number of the volume and the page number.

ANSWER:

4. **DEBTS, NOTES & JUDGMENTS:** State the names and addresses of any and all persons whom Clearfield Dental Arts, Inc. believes owes it money and set forth in detail the amount of money owed, the terms of payment and whether or not Clearfield Dental Arts, Inc. has written evidence of this indebtedness and, if so, give full details. If Clearfield Dental Arts, Inc. holds a judgment or judgments as security for any of these debts, state where and when the judgment was recorded; and the county, number and term where the judgment is recorded. If Clearfield Dental Arts, Inc. holds this judgment or judgments jointly with any other person or persons, give their name and address.

ANSWER:

5. GOVERNMENT, MUNICIPAL OR CORPORATE BONDS: State whether Clearfield Dental Arts, Inc. owns individually or jointly any corporate or governmental bonds. If so, include the face amount, serial numbers and maturity date and state the present location thereof. If Clearfield Dental Arts, Inc. owns any of these bonds jointly with any other person or persons, give their full name and address.

ANSWER:

6. **STOCKS, SHARES OR INTEREST:** State whether Clearfield Dental Arts, Inc. owns any stocks, shares or interest in any corporation or unincorporated association or partnership interest, limited or general, and state the location thereof. Include the names and addresses of the organizations and the serial numbers of the shares or stocks. If Clearfield Dental Arts, Inc. owns any of the stocks, shares or interest jointly with any other person or persons, give their name and address.

ANSWER:

7. ACCOUNTS: State whether Clearfield Dental Arts, Inc. maintains any checking or savings accounts. If so, state the name and location of the banks or savings and loan association or building and loan association or credit union and the branch or branches thereof, the identification numbers of those accounts and the amount of assets Clearfield Dental Arts, Inc. has in each account. If Clearfield Dental Arts, Inc. maintains any of these jointly with any person, give their name and address.

ANSWER:

8. **SAFETY DEPOSIT BOXES:** State whether Clearfield Dental Arts, Inc. maintains any safety deposit box or boxes. If so, include the name of the bank or banks, branch or branches and the identification number or other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If Clearfield Dental Arts, Inc. maintains any of these jointly with another person, give their full name and address.

ANSWER:

9. **TRANSFERRED ASSETS AND GIFTS:** If, since the date upon which the debt herein was first incurred to the Plaintiff herein, Clearfield Dental Arts, Inc. has transferred any assets (real property, personal property, chose in action) to any person and/or if Clearfield Dental Arts, Inc. has given any gift of any asset, including money, from any person, set forth in detail a description of the property, the type of transaction and the name and address of the transferee or recipient.

ANSWER:

10. **PERSONAL PROPERTY:** State whether Clearfield Dental Arts, Inc. owns any personal property. Include a full description of all furnishings and other items of personal property (including jewelry) with full description, value and present location. State also whether or not there are any encumbrances on that property and if so, the name and address of the encumbrance holder, the date of the encumbrance, the original amount of that encumbrance, the present balance of that encumbrance and the transaction which gave rise to the existence of the encumbrance. If Clearfield Dental Arts, Inc. owns any personal property jointly with any other person or persons, give their name and address.

ANSWER:

11. MOTOR VEHICLES: State whether Clearfield Dental Arts, Inc. owns any motor vehicles. Include a full description of such motor vehicles including color, model, title number, serial number and registration plate number. Also, show the exact name or names in which the motor vehicles are registered, the present value of those motor vehicles and their present location and place of regular storage, garaging or parking. State also whether there are any encumbrances on those motor vehicles and if so, the name and address of the encumbrance holder, the date of the encumbrance, the original amount of the encumbrance, the present balance of the encumbrance and the transaction which gave rise to the existence of the encumbrance.

ANSWER:

12. **OTHER ASSETS:** If Clearfield Dental Arts, Inc. has any asset or assets which are not disclosed in the preceding Interrogatories, please set forth all details concerning those assets.

ANSWER:

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

THE TICONIUM COMPANY,

Plaintiff

vs.

:

: No.

CLEARFIELD DENTAL ARTS, INC.,

Defendant

:

:

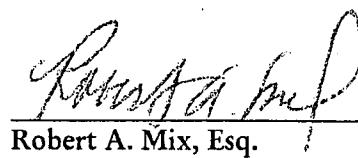
:

:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Interrogatories in Aid of Execution was deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania, on the 7th day of December, 2000 addressed to the following:

Clearfield Dental Arts, Inc.
508 Krebs Avenue
Clearfield, PA 16830



Robert A. Mix, Esq.

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

THE TICONIUM COMPANY,

Plaintiff :

vs.

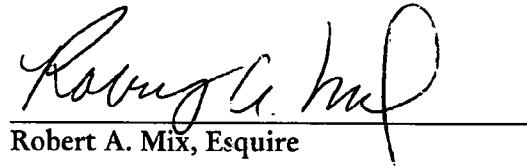
: No. 00-1526-00

CLEARFIELD DENTAL ARTS, LTD.,

Defendant :

VERIFICATION

Robert A. Mix, Esquire, being duly sworn according to law deposes and says that he is the attorney for Plaintiff herein; that he is authorized to make this verification on its behalf; and that the facts set forth in the Motion to Compel Discovery are true and correct to the best of his knowledge, information and belief. This verification is executed in accordance with Pa. R.C.P. 1024(c) and this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



Robert A. Mix, Esquire

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

THE TICONIUM COMPANY,

Plaintiff :

vs.

: No.

CLEARFIELD DENTAL ARTS, INC.,

Defendant :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Compel
Discovery was deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania,
on the 12th day of January, 2001 addressed to the following:

Clearfield Dental Arts, Inc.
508 Krebs Avenue
Clearfield, PA 16830



Robert A. Mix, Esq.

(P)

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

THE TICONIUM COMPANY,

Plaintiff :
: No. 00-1526-CD
:
: Type of Pleading: Motion for Sanctions
:
:
Defendant : Filed on Behalf of: Plaintiff
:
: Counsel of Record:
: Robert A. Mix, Esq.
: Lee, Martin, Green & Reiter, Inc.
: I.D. #16164
: 115 E. High Street
: Lock Drawer 179
: Bellefonte, PA 16823
: 814-355-4769

CLEARFIELD DENTAL ARTS, LTD.,

FILED

FFR 21 2001

William A. Shaw
Prothonotary

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

THE TICONIUM COMPANY, :
Plaintiff :
:
vs. : No. 00-1526-00
:
CLEARFIELD DENTAL ARTS, LTD., :
Defendant :
:

MOTION FOR SANCTIONS

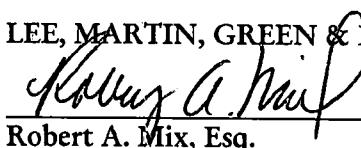
NOW COMES Plaintiff The Ticonium Company by its attorneys, Lee, Martin, Green & Reiter, Inc., pursuant to Pa. R.C.P. 4019 and respectfully represents:

1. On December 8, 2000, judgment in the amount of \$1,553.59 was entered in the Court of Common Pleas of Clearfield County, Pennsylvania in favor of Plaintiff and against Defendant.
2. On December 7, 2000, Plaintiff served Interrogatories in Aid of Execution against Defendant.
3. On January 12, 2001, Plaintiff filed a Motion to Compel Discovery with reference to said Interrogatories in Aid of Execution against Defendant.
4. On January 16, 2001, this Court issued an Order directing Defendant to provide Plaintiff with Answers to said Interrogatories in Aid of Execution within twenty (20) days of said Order.
5. As of the date of filing this Motion for Sanctions, Defendant has not provided Plaintiff with Answers to said Interrogatories in Aid of Execution, requested or been granted an additional extension of time for providing Answers or filed objections or a request for a protective order with reference to said Answers.

6. Plaintiff will be prejudiced in its efforts to enforce the judgment unless Defendant is required to provide Answers to said Interrogatories in Aid of Execution.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to issue an Order imposing a penalty on Defendant for each day it fails to provide Plaintiff with Answers to said Interrogatories in Aid of Execution in compliance with the Order of January 16, 2001 or such other sanctions as the Court deems appropriate.

LEE, MARTIN, GREEN & REITER, INC.

By: 

Robert A. Mix, Esq.
I.D. #16164
Attorney for Plaintiff
115 E. High Street
P.O. Box 179
Bellefonte, PA 16823
814-355-4769

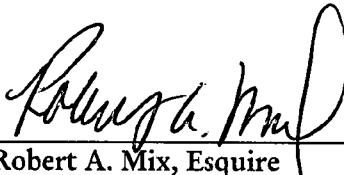
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

THE TICONIUM COMPANY,

Plaintiff :
vs. :
: No. 00-1526-00
CLEARFIELD DENTAL ARTS, LTD., :
Defendant :
:

VERIFICATION

Robert A. Mix, Esquire, being duly sworn according to law deposes and says that he is the attorney for Plaintiff herein; that he is authorized to make this verification on its behalf; and that the facts set forth in the Motion for Sanctions are true and correct to the best of his knowledge, information and belief. This verification is executed in accordance with Pa. R.C.P. 1024(c) and this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



Robert A. Mix, Esquire

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

THE TICONIUM COMPANY,

Plaintiff

vs.

:

: No. 00-1526-00

CLEARFIELD DENTAL ARTS, INC.,

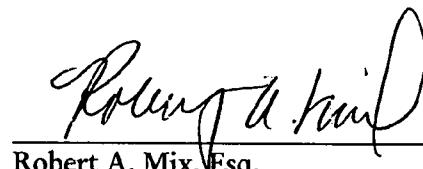
Defendant

:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Sanctions was deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania, on the 20th day of February, 2001 addressed to the following:

Clearfield Dental Arts, Inc.
508 Krebs Avenue
Clearfield, PA 16830



Robert A. Mix, Esq.

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

THE TICONIUM COMPANY,

:
Plaintiff

vs.

: No. 00-1526-00

CLEARFIELD DENTAL ARTS, LTD.,

:
Defendant

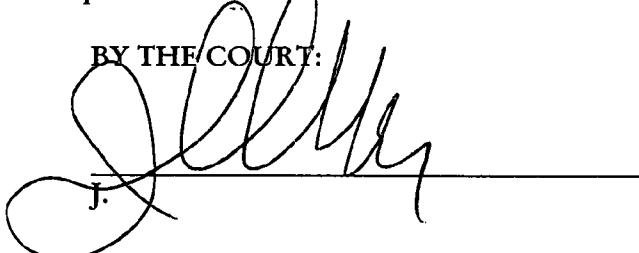
ORDER

AND NOW, this 23rd day of February, 2001 upon consideration of

Plaintiffs' Motion for Sanctions, and it appearing that Defendant has failed to file timely
Answers to Plaintiffs' Interrogatories in Aid of Execution in accord with this Court's Order

dated January 16, 2001, it is hereby Ordered that Defendant shall pay a penalty of \$ 100.00
per day for each day from the date of this Order until the date Answers to Plaintiffs'
Interrogatories in Aid of Execution are served upon counsel for Plaintiff.

BY THE COURT:



FILED

FEB 23 2001

William A. Shaw
Prothonotary