

00-1597-CD  
ALLEN R. HAFF -vs- KIMBERLY ANN GOSS etal

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

ALLEN R. HAFF,	:	
Plaintiff	:	
VS.	:	NO20 00-1597 -CD
	:	
KIMBERLY ANN GOSS and	:	
QUAY TAYLOR,	:	
Defendants	:	

CASE NUMBER:           00-           -CD

TYPE OF CASE:           Civil

TYPE OF PLEADING:    COMPLAINT

FILED ON BEHALF OF:   Plaintiff

COUNSEL OF RECORD FOR THIS PARTY:   R. DENNING GEARHART, ESQUIRE  
Supreme Court I.D. #26540  
215 East Locust Street  
Clearfield, PA 16830  
(814) 765-1581

**FILED**

DEC 27 2000

William A. Shaw  
Prothonotary

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

ALLEN R. HAFF,  
Plaintiff

VS.

NO. 00- -CD

KIMBERLY ANN GOSS and  
QUAY TAYLOR,  
Defendants

**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's Office  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641 Ext. 50-51

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

ALLEN R. HAFF,  
Plaintiff

VS.

KIMBERLY ANN GOSS and  
QUAY TAYLOR,  
Defendants

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NO. oo- -CD

**COMPLAINT**

**AND NOW**, comes ALLEN R. HAFF, by and through his attorney, R. Denning Gearhart, who files this Complaint and avers as follows:

1. Plaintiff is ALLEN R. HAFF, is an adult individual, who resides at R.R. #1, Box 491, Woodland, Clearfield County, Pennsylvania 16881.
2. Defendant, KIMBERLY ANN GOSS, is an adult individual, with an address of 530 Mt. Joy Road, Clearfield, Clearfield County, Pennsylvania 16830.
3. Defendant, QUAY TAYLOR, is an adult individual, with an address of 530 Mt. Joy Road, Clearfield, Clearfield County, Pennsylvania 16830.
4. Plaintiff, Allen R. Haff, was the owner of a 1986 Chevrolet Silverado Pickup Truck. Defendant, Kimberly Ann Goss, was driving a 1996 Dodge Stratus owned by Defendant, Quay Taylor, and was driving this vehicle in a negligent and reckless manner specifically as follow:
  - a. Kimberly Ann Goss pulled out of a parking lot onto Healey Avenue in front of the car of Sgt. J.M. Zelenky. She then headed north where she stopped at the intersection of East Locust Street at which time she initiated a left turn onto East Locust

Street. Upon entering the intersection Defendant, Kimberly Ann Goss, collided with Allen R. Haff, who was heading west on East Locust Street.

5. That at the same time, Plaintiff was operating in his vehicle in a lawful manner.

6. That as a result of Defendant, Kimberly Ann Goss's, operation in a manner described above, Plaintiff and Defendant, Kimberly Ann Goss, collided.

7. That as a result of the collision, damages were done to Plaintiff's vehicle, and costs incurred, causing the described expenses:

a.	Ross Towing	
	Original bill	\$93.00
	Rental vehicle at the rate of \$25.00 per day	
	3/19/99 to 9/15/99	\$4,500.00
	Vehicle storage at the rate of \$9.50	
	per day from 2/28/99 to present	\$6,194.00
	Value of vehicle plus accessories	
	Less salvage value (\$500.00)	\$6,287.10

8. The accident, and the damage resulting from the accident were solely caused by the negligent operation of the vehicle owned by Defendant, Quay Taylor, by Defendant, Kimberly Ann Goss.

**WHEREFORE**, Plaintiff prays your Honorable Court to enter Judgment for him and against Defendant, Kimberly Ann Goss in an amount of \$17,074.10.

## **COUNT II**

9. That paragraphs One (1) through Eight (8) are incorporated herein as though set forth in full.

10. That Defendant, Quay Taylor, was negligent in allowing Defendant, Kimberly Ann Goss, to drive the vehicle in that he knew, or should have known, that she would operate in a negligent manner.

**WHEREFORE**, Plaintiff, prays your Honorable Court to enter Judgment for him and against Defendant, Quay Taylor, in an amount of \$17,074.10.

Respectfully submitted,

  
\_\_\_\_\_  
R. Denning Gearhart  
Attorney for Plaintiff


COMMONWEALTH OF PENNSYLVANIA :  
: SS:  
COUNTY OF CLEARFIELD :

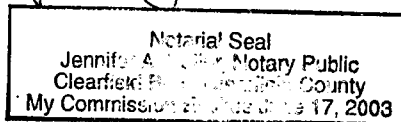
**AFFIDAVIT**

Before me, the undersigned officer, personally appeared, ALLEN R. HAFF who being duly sworn according to law deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
ALLEN R. HAFF

Sworn to and subscribed  
before me this 15<sup>th</sup> day  
of December, 2000.

  
\_\_\_\_\_  
Notary Public



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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA (CIVIL DIVISION) NO. 00- -CD	ALLEN R. HAFF, Plaintiff VS. KIMBERLY ANN GOSS, et al, Defendants	COMPLAINT	R. DENNING GEARHART ATTORNEY AT LAW CLEARFIELD, PA. 16830
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CORRECTIONAL PRINTING CO., CLEARFIELD, PA

**FILED**

DEC 27 2000

0/2:55/uy

William A. Shaw

Prothonotary

4 CMT to ATTY



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10547

HAFF, ALLEN R.

00-1597-CD

VS.

GOSS, KIMBERLY ANN and QUAY TAYLOR

COMPLAINT

SHERIFF RETURNS

NOW JANUARY 8, 2001 AT 7:50 AM EST SERVED THE WITHIN COMPLAINT ON QUAY TAYLOR, DEFENDANT AT RESIDENCE, 530 MT. JOY ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO QUAY TAYLOR A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.  
SERVED BY: NEVLING

NOW JANUARY 8, 2001 AT 7:50 AM EST SERVED THE WITHIN COMPLAINT ON KIMBERLY ANN GOSS, DEFENDANT AT RESIDENCE, 530 MT. JOY ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO QUAY TAYLOR, LIVE-IN BOYFRIEND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.  
SERVED BY: NEVLING

Return Costs

Cost	Description
25.34	SHFF. HAWKINS PAID BY: ATTY.
20.00	SURCHARGE PD. BY: ATTY.

FILED

JAN 15 2001  
m 11:08  
William A. Shaw  
Prothonotary

Sworn to Before Me This

15th Day of January 2001  
*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

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

ALLEN R. HAFF,  
Plaintiff

VS.

KIMBERLY ANN GOSS and  
QUAY TAYLOR,  
Defendants

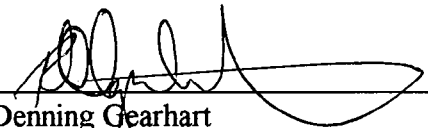
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NO. 00-1597-CD

**PRAECIPE TO MARK ACTION SATISFIED AND SETTLED**

TO THE PROTHONOTARY OF SAID COURT:

Please mark the above-captioned action satisfied and settled.

  
R. Denning Gearhart  
Attorney for Plaintiff

Dated: May 30, 2001

**FILED**

MAY 31 2001

William A. Shaw  
Prothonotary

**FILED**

MAY 31 2001

09:53/NO CC - Cert. Das. to  
William A. Shaw  
Prothonotary

Atty.

For Copy to CA  
*[Signature]*

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IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Allen R. Haff

Vs.  
Kimberly Ann Goss  
Quay Taylor

No. 2000-01597-CD

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on May 31, 2001 marked:

Satisfied and Settled

Record costs in the sum of \$80.00 have been paid in full by R. Denning Gearhart, Esquire.

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

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William A. Shaw, Prothonotary