

01-90-CD -
GARY L. GLASS et al - v/s - LOMA MAY MICHAELS

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

V.

LONA MAY MICHAELS and
an individual,
Defendants.

No. 01 - 90 - CD
JURY TRIAL DEMANDED

Type of Pleading:

Complaint

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.

311 1/2 E. Locust St.

P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

JAN 18 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

*
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*
*

v.

* No. 01 - - CD
* JURY TRIAL DEMANDED

LONA MAY MICHAELS and
an individual,
Defendants.

*
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*

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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
Market and Second Streets
Clearfield, PA 16830

(814) 765-2641

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

v.
MAY MICHAELS and
individual,
Defendants.

COMPLAINT

NOW COME the Plaintiffs, Gary L. Glass and Linda L. Glass, and by their attorney, James A. Naddeo, Esquire, set forth the following:

1. That the Plaintiff, Gary L. Glass, is a sui-juris, adult individual who resides at 413 Spring Street, Houtzdale, Pennsylvania 16651.

2. That the Plaintiff, Linda L. Glass, is a sui-juris, adult individual who resides at 413 Spring Street, Houtzdale, Pennsylvania 16651.

3. That the Defendant, Lona May Michaels, is a sui-juris, adult individual who resides at R. D. 3, Box 73B, Clearfield, Pennsylvania 16830.

COUNT I

Linda L. Glass v. Lona May Michaels

4. That on or about August 31, 1999 at approximately 4:21 p.m., E.D.S.T., the Plaintiff, Linda L. Glass, was the

operator of a 1997 Ford Escort LX bearing Pennsylvania Registration No. ALR-3342 which vehicle was owned by the Plaintiffs, Gary L. Glass and Linda L. Glass.

5. That on the said date and at or about the said time, the Defendant, Lona May Michaels, was the operator of a 1994 Ford vehicle bearing Pennsylvania Registration No. AMJ-1118 which vehicle was owned by Lona May Michaels and Williard J. Michaels.

6. That Hannah Street is a two-lane, macadam roadway which proceeds in a generally East-West direction through Houtzdale Borough, Clearfield County, Pennsylvania, and intersects with Good Street which intersection is controlled by stop signs.

7. That Good Street is a two-lane, macadam roadway which proceeds in a generally north-south direction through Houtzdale Borough, Clearfield County, Pennsylvania, and is controlled by a stop sign for vehicles proceeding in a northerly direction.

8. That on the aforesaid date and at or about the said time, it was daylight and the roadway was dry.

9. That on the aforesaid date and at or about the said time, the Plaintiff, Linda L. Glass, was traveling West on Hannah Street and had approached the intersection of Hannah Street and Good Street.

10. That on the aforesaid date and at or about the said time, the Defendant was traveling North on Good Street where she drove her vehicle onto Hannah Street without stopping at the stop sign and directly into the path of the vehicle operated by the Plaintiff, Linda L. Glass, where the front of Defendant's vehicle struck the left rear portion of the vehicle operated by the Plaintiff, Linda L. Glass, causing the Plaintiff's vehicle to make a 360° turn in the middle of the roadway then striking a curb and fire hydrant.

11. That as a result of the collision described in Paragraph 10 hereof which is incorporated herein by reference, the Plaintiff, Linda L. Glass, was thrown generally forward and backward within the vehicle that she was operating causing the numerous and serious injuries hereinafter set forth.

12. That the Defendant, Lona May Michaels, was guilty of the following negligence, recklessness and carelessness which was the proximate cause of the accident and the injuries to the Plaintiff, Linda L. Glass, as follows:

A. That the Defendant failed to have her vehicle under proper control;

B. That the Defendant failed to maintain a proper lookout;

C. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3361,

75 P.S. Section 3361 and supplements thereto, in that she operated her vehicle upon Good Street at a speed greater than was reasonable and prudent under the conditions then and there existing and without regard to the actual and/or potential hazards then and there existing and at a speed which was greater than would permit her to bring her vehicle to a stop within the assured clear distance ahead.

D. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3714, 75 P.L. Section 3714 and supplements thereto in that she operated her vehicle upon Good Street with careless disregard for the safety of the Plaintiff, Linda L. Glass.

E. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P. L. 162, Section 3736, 75 P. S. Section 3736, and supplements thereto, in that she operated her vehicle upon Good Street in willful or wanton disregard for the safety of the person or property of the Plaintiff, Linda L. Glass.

F. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3323, 75 P.S. Section 3323, and supplements thereto in that she failed to yield the right-of-way to the vehicle

occupied by the Plaintiff which was in the intersection approaching so closely as to constitute a hazard for her to have proceeded into the intersection.

G. That the Defendant was negligent, careless and reckless in that she failed to use due care under all circumstances of the case.

13. That as a result of the collision described in Paragraph 10 hereof, the Plaintiff, Linda L. Glass, suffered the following injuries which may and probably will be permanent:

- A. Torn supraspinatus tendon right shoulder;
- B. Left posterior herniation of the C6/C7 discs;
- C. Contusion of face.
- D. Cervical strain/sprain injury.

14. That as a result of the injuries referred to in Paragraph 13 hereof, the Plaintiff, Linda L. Glass, has been unable to engage in her regular household duties since the time of the accident up to and including the filing of this Complaint and will be unable to do so for an indefinite period of time in the future.

15. That as a result of the injuries referred to in Paragraph 13 hereof, the Plaintiff, Linda L. Glass, may incur medical expenses for the treatment of her injuries in excess of her available first party medical benefits.

16. That the Plaintiff, Linda L. Glass, claims a reasonable amount for the following:

- A. Pain and suffering; past, present and future;
- B. Privation and inconvenience; past, present and future;
- C. Future medical expenses;
- D. All other damages allowable by law.

WHEREFORE, the Plaintiff, Linda L. Glass, claims damages from the Defendant in excess of Twenty Thousand (\$20,000.00) Dollars. Jury Trial Demanded.

Second Count

Gary L. Glass v. Lona May Michaels

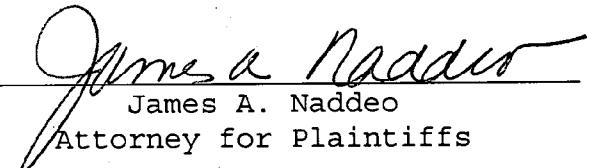
17. That the Plaintiff, Gary L. Glass, is the husband of Linda L. Glass having been married to her on May 14, 1994.

18. That the Plaintiff, Gary L. Glass, incorporates Paragraphs 1 through 16 of the First Count of this Complaint by reference and makes them a part hereof.

19. That at all times referred to herein, the Plaintiff, Gary L. Glass, was residing with his wife, Linda L. Glass, and continues to reside with her up to the date of this Complaint.

20. That as a result of the injuries suffered by the Plaintiff, Linda L. Glass, the Plaintiff, Gary L. Glass, has been deprived of the services and society of his wife and will continue to be so deprived for an indefinite period of time in the future.

WHEREFORE, Plaintiff, Linda L. Glass, claims damages from the Defendant, Lona May Michaels, in excess of Twenty Thousand (\$20,000.00) Dollars. Jury Trial Demanded.



James A. Naddeo
Attorney for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD

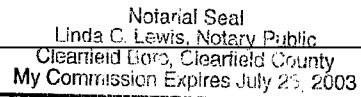
)

Before me, the undersigned officer, personally appeared LINDA L. GLASS, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

Linda L. Glass
Linda L. Glass

SWORN and SUBSCRIBED before me this 17th day of January, 2001..

Linda C. Lewis



FILED

JAN 18 2001
William A. O'Brien
Prothonotary
PA

\$80.00

lcc Sheppard

Last over margin -----

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
**PRAECIPE FOR ENTRY OF
APPEARANCE**

Defendants.

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

JAN 24 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS, :
husband and wife, : No. 01-90-C.D.
: Plaintiffs,
: vs.
: LONA MAY MICHAELS, and an
individual, : Defendants.

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter our appearance on behalf of Defendant, LONA MAY MICHAELS, in the
above-captioned matter.

We are authorized to accept service on behalf of Defendant LONA MAY MICHAELS.

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

Dated: January 23, 2001

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
Lona May Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

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

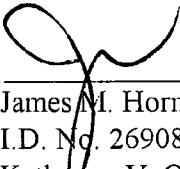
GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual, :
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praeclipe for Entry of Appearance on behalf Defendant Lona May Michaels, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 23rd day of January, 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
Lona May Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

JAN 24 2001
1102 NO CC
M
William A. Shaw
Prothonotary
ECP

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10607

GLASS, GARY L. & LINDA L.

01-90-CD

VS.

MICHAELS, LONA MAY

COMPLAINT

SHERIFF RETURNS

**NOW JANUARY 22, 2001 AT 1:47 PM EST SERVED THE WITHIN COMPLAINT ON
LONA MAY MICHAELS, DEFENDANT AT RESIDENCE, RR# 3, BOX 73B,
CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BOB
MICHAELS, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.**

SERVED BY: DAVIS/MORGILLO

Return Costs

Cost Description

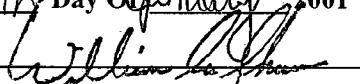
19.34 SHFF. HAWKINS PAID BY: ATTY.

10.00 SURCHARGE PAID BY: ATTY.

FILED

**JAN 29 2001
01/10:53 AM
William A. Shaw
Prothonotary**

Sworn to Before Me This

29th Day of January 2001


**WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co. Clearfield, PA.**

So Answers,


**Chester A. Hawkins
Sheriff**

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

No. 01-90-C.D.

TYPE OF PLEADING:
CERTIFICATES OF SERVICE

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

FEB 15 2001

William A. Shaw
Prothonotary

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

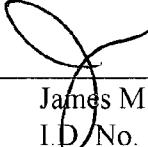
GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs, :
vs. :
LONA MAY MICHAELS, and an
individual, :
Defendants. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Interrogatories Propounded by Defendant for Answer By Plaintiffs (One) and Request for Production (Set One) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 14th day of February 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830

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

By: 

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

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

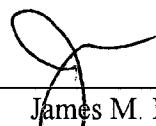
GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual,
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Second Request For Production of Documents and Tangible Things By Defendant Directed to Plaintiffs in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 14th day of February 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830

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

By: 

James M. Horne, Esquire
ID No. 26908
Attorney for Defendant Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

FEB 15 2001

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10-29148-CC

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
ANSWER WITH NEW MATTER

Defendants.

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

FEB 15 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
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Defendants.

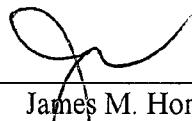
NOTICE TO PLEAD

TO: Gary L. Glass and Linda L. Glass, husband and wife
% James A. Naddeo, Esquire

YOU ARE HEREBY notified to plead to the within New Matter within twenty (20) days
from the date of service hereof or a default judgment may be entered against you.

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

Dated: February 14, 2001

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

DEFENDANT LONA MAY MICHAELS' ANSWER WITH NEW MATTER

AND NOW, comes Defendant, Lona May Michaels, by and through her undersigned
counsel, McQuaide, Blasko, Schwartz, Fleming & Faulkner, Inc., and files the within Answer with
New Matter to Plaintiffs' Complaint, and in support thereof, avers as follows:

1. After reasonable investigation, Defendant is without knowledge or information
sufficient to form a belief as to the truth of the allegations of paragraph 1. The same are therefore
denied and strict proof thereof demanded.

2. After reasonable investigation, Defendant is without knowledge or information
sufficient to form a belief as to the truth of the allegations of paragraph 2. The same are therefore
denied and strict proof thereof demanded.

3. Admitted.

Count I
Linda J. Glass v. Lona May Michaels

4. Admitted.

5. Admitted.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted in part and denied in part. It is admitted that at or about the date, time and place alleged Defendant's vehicle entered the intersection in question and contacted Plaintiffs' vehicle. To the extent Defendant did not stop at the traffic sign, the same occurred despite Defendant's attempt to operate her vehicle in a careful and prudent fashion. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations of paragraph 10. The same are therefore denied and strict proof thereof demanded.

11. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the balance of the averments of paragraph 11. The same are therefore denied and strict proof thereof demanded.

12. A. - G. Denied, pursuant to Pa. R.C.P. No. 1029(e).

13. - 16. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 13 through 16, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant requests that Plaintiff's complaint be dismissed, with prejudice and costs of suit.

Second Count
Gary L. Glass v. Lona May Michaels

17. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 17. The same are therefore denied and strict proof thereof demanded.

18. Defendant incorporates herein by reference, the same as though set forth at length, her responses to paragraphs 1 through 16, inclusive.

19. - 20. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 19 and 20, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant requests that Plaintiff's complaint be dismissed, with prejudice and costs of suit.

NEW MATTER

21. Defendant hereby asserts and raises all those defenses and limitations on damages available to her by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

22. To the extent Plaintiffs' medical expenses and wage loss, if any, have been paid or are payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

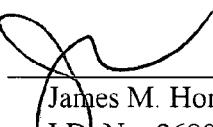
23. To the extent Plaintiffs were insured under a policy of insurance bearing the limited tort option, Plaintiffs' claims are barred or reduced accordingly.

WHEREFORE, Defendant requests that Plaintiffs' complaint be dismissed, with prejudice and costs of suit.

Respectfully submitted,

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

Dated: February 14, 2001

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

VERIFICATION

The undersigned verifies that she is authorized to make this Verification on her own behalf, and that the statements made in the foregoing Answer with New Matter of Defendant Lona May Michaels, are true and correct to the best of her knowledge, information and belief. The undersigned understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.


LONA MAY MICHAELS

Dated: Feb 10, 2001

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

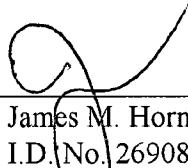
GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual,
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Lona May Michaels' Answer with New Matter, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 14th day of February 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
Lona May Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

FEB 15 2001

*See
J.W. 10.20.1100
William A. Shaw
Prothonotary*

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

Defendants.

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

FEB 15 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs, :
vs. :
LONA MAY MICHAELS, and an
individual, :
Defendants. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery directed to: Philipsburg Hospital, Philipsburg Medi-Center, Geisinger Clinic, University Orthopedics & Sports Medicine Center, and Susan Harchak, D.C., in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 14th day of February 2001, to the attorney/party of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: _____

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

FILED

FEB 15 2001
m/10:45/120cc
William A. Shaw
Prothonotary
(SAC)

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

v.

LONA MAY MICHAELS and
an individual,
Defendants.

* No. 01-90-CD
* JURY TRIAL DEMANDED

* Type of Pleading:

* Answer to New Matter

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

FEB 20 2001

0/3:35 AM
William A. Shaw
Prothonotary

1 Court to Am
S&S

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

GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

ANSWER TO NEW MATTER

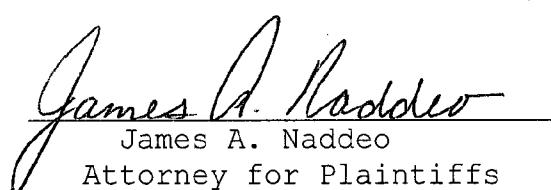
NOW COME the Plaintiffs, Gary L. Glass and Linda L. Glass, and by their attorney, James A. Naddeo, Esquire, sets forth the following Answer to Defendants' New Matter:

1. Paragraph 21 states a legal conclusion to which no answer is required.

2. Paragraph 22 states a legal conclusion to which no answer is required.

3. Paragraph 23 states a legal conclusion to which no answer is required.

WHEREFORE, Plaintiffs claim damages as set forth in their original complaint.



James A. Naddeo
Attorney for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD

)

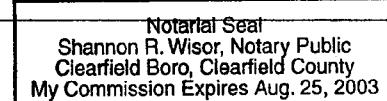
Before me, the undersigned officer, personally appeared LINDA L. GLASS, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Answer to New Matter are true and correct to the best of her knowledge, information and belief.

Linda L. Glass

Linda L. Glass

SWORN and SUBSCRIBED before me this 30th day of February, 2001.

Shannon R. Wisor



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

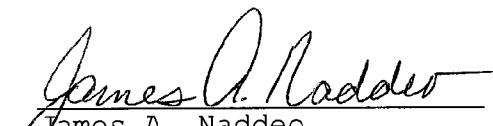
GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Plaintiffs' Answers to New Matter in the above-captioned action was served on the following person and in the following manner on the 20th day of February, 2001:

First-Class Mail, Postage Prepaid

James N. Horne, Esquire
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801



James A. Naddeo
Attorney for Plaintiffs

— Lap over margin —

JAMES A. NADDEO
ATTORNEY AT LAW
211½ EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
**Certificate Prerequisite to Service
of Subpoenas Pursuant to Rule
4009.22**

Defendants.

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
**DEFENDANT
LONA MAY MICHAELS**

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

FEB 22 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) by correspondence dated February 14, 2001, Plaintiffs' counsel has waived the 20-day objection period, and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: 2-21-01

By: J. M. Horne

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant Michaels
811 University Drive
State College, PA 16801-6699
(814) 238-4926

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

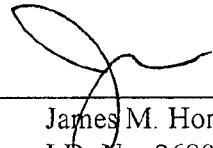
Defendant intends to serve subpoenas identical to those that are attached to this notice.

You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

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

Date: February 14, 2001

By: _____


James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant Michaels
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

GARY L. GLASS and LINDA L. GLASS,
husband and wife. : No. 01-90-C.D.

Plaintiffs, :
:

vs.

LONA MAY MICHAELS, and an individual

Defendants

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *Philipsburg Hospital*
210 Loch Lomond Road
Philipsburg, PA 16866

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: _____, 2001

William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *Philipsburg Medi-Center
15 Ames Plaza
Philipsburg, PA 16866*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: _____, 2001

William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *Geisinger Clinic at Scenery Park
200 Scenery Drive
State College, PA 16801*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: _____, 2001

William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

GARY L. GLASS and LINDA L. GLASS,
husband and wife, No. 01-90-C.D.

Plaintiffs.

VS.

LONA MAY MICHAELS, and an individual,

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *University Orthopedics & Sports Medicine Center
101 Regent Court
State College, PA 16801*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: _____, 2001

William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *Susan Harchak, D.C.
1114 Walton Street
Philipsburg, PA 16866*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: _____, 2001

William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

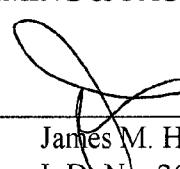
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Certificate Prerequisite to Service of Subpoenas to Produce Documents and Things for Discovery directed to: Philipsburg Hospital, Philipsburg Medi-Center, Geisinger Clinic, University Orthopedics & Sports Medicine Center, and Susan Harchak, D.C., in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 21st day of February 2001, to the attorney/party of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: _____


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

FILED

FEB 22 2001
10:34 AM
William A. Shaw
Prothonotary
EJH

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

*
*
*
*
*

v.

* No. 01-90-CD
* JURY TRIAL DEMANDED

LONA MAY MICHAELS and
an individual,
Defendants.

*
*
*
*
*

* Type of Pleading:

* Certificate of Service

*

*

* Filed on behalf of:
* Plaintiffs

*

* Counsel of Record for
* this party:

*

* James A. Naddeo, Esq.
* Pa I.D. 06820

*

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

MAR 15 2001

William A. Shaw
Prothonotary

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

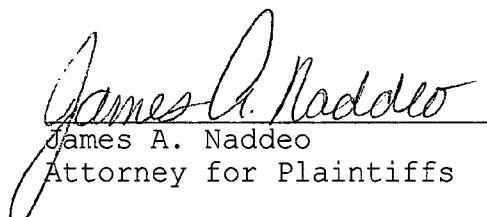
GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Plaintiffs' Response to Defendant's Request for Production of Documents in the above-captioned action was served on the following person and in the following manner on the 15th day of March, 2001:

First-Class Mail, Postage Prepaid

James N. Horne, Esquire
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801


James A. Naddeo
Attorney for Plaintiffs

FILED

MAR 15 2001
2/3/99/cathy Naddeo
William A. Shaw
Prothonotary
ECCP

1/2" over margin

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

FILED

MAR 15 2001

William A. Shaw
Prothonotary

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

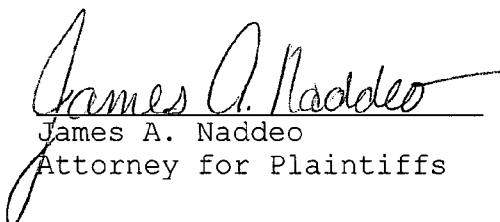
GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Plaintiffs' Answers to Defendant's Interrogatories in the above-captioned action was served on the following person and in the following manner on the 15th day of March, 2001:

First-Class Mail, Postage Prepaid

James N. Horne, Esquire
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801


James A. Naddeo
Attorney for Plaintiffs

FILED

MAR 15 2001

Q/3/391/CC-atty Naddeo
William A. Shaw
Prothonotary

SKP

Leave over margin

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

Defendants.

TYPE OF CASE: **CIVIL**

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 03 2001

William A. Shaw
Prothonotary

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

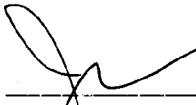
GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual,
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery directed to: Clearfield Hospital in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 2nd day of April, 2001, to the attorney/party of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: 

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

FILED

APR 03 2001

William A. Shaw

Prothonotary

No 9C

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

TYPE OF CASE: **CIVIL**

Defendants.

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 23 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual,
Defendants.

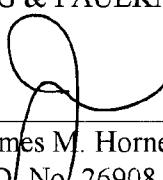
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Lona May Michaels' Notices of Depositions of Plaintiffs, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 20th day of April, 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: _____


James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
Lona May Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

APR 23 2001
M 18:45/10cc
William A. Shaw
Prothonotary

FCB

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

TYPE OF PLEADING:
**Certificate Prerequisite to Service
of Subpoenas**

TYPE OF CASE: **CIVIL**

Defendants.

FILED ON BEHALF OF:
DEFENDANT
LONA MAY MICHAELS

COUNSEL OF RECORD FOR
THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. #26908
KATHERINE V. OLIVER, ESQ.
I.D. #77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 24 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

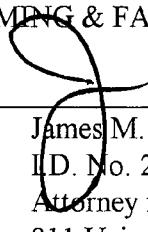
CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) no objection to the subpoenas has been received, and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: 4/23/01

By: 

James M. Horne, Esquire
ID. No. 26908
Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant intends to serve subpoenas identical to those that are attached to this notice.

You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

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

Date: April 2, 2001

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorney for Defendant Michaels
814 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

GARY L. GLASS and LINDA L. GLASS,
husband and wife,

No. 01-90-C.D.

Plaintiffs,

vs.

LONA MAY MICHAELS, and an
individual,

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: CLEARFIELD HOSPITAL

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records in your possession pertaining to Linda L. Glass, SS#193-52-8257, Date of Birth: 9/23/57.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things sought.

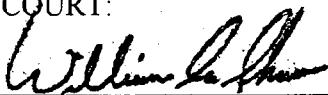
If you fail to produce the documents or things required by this subpoena, within twenty (20) days after its service, the party serving this subpoena may seek a court ordering compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant Michaels*

BY THE COURT:

Dated: February 15, 2001


William A. Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

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

GARY L. GLASS and LINDA L. GLASS,
husband and wife, : No. 01-90-C.D.
Plaintiffs,
vs.
LONA MAY MICHAELS, and an
individual, :
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Lona May Michaels' Certificate
Prerequisite to Service of Subpoenas, in the above-captioned matter was mailed by U.S. First
Class Mail, postage prepaid, on this 23rd day of April, 2001, to the attorney of record:

James A. Naddeo, Esquire
211½ East Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
Lona May Michaels
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

APR 24 2001

MICHAEL COCC
William A. Shaw
Prothonotary

ER
ER

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

v.

LONA MAY MICHAELS and
an individual,
Defendants.

* No. 01-90-CD
* JURY TRIAL DEMANDED

* Type of Pleading:

* Certificate of Service

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

APR 24 2001

William A. Shaw
Prothonotary

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

GARY L. GLASS and	*
LINDA L. GLASS,	*
husband and wife,	*
Plaintiffs,	*
	*
v.	*
	No. 01-90-CD
	*
LONA MAY MICHAELS and	JURY TRIAL DEMANDED
an individual,	*
Defendants.	*

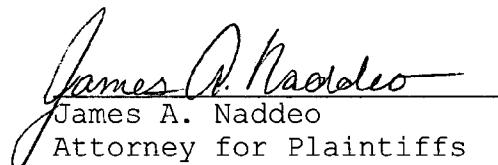
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of Notice of Deposition filed in the above-captioned action was served on the following person and in the following manner on the 24th day of April, 2001:

First-Class Mail, Postage Prepaid

James N. Horne, Esquire
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801

ASAP Court Reporting
PO Box 345
Ebensburg, PA 15931



James A. Naddeo
Attorney for Plaintiffs

FILED

APR 24 2001
3713cc. atty naddeo
William A. Shaw
Prothonotary
Court

Lap over margin

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
PO. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

GARY L. GLASS and
LINDA L. GLASS,
husband and wife,
Plaintiffs,

V.

LONA MAY MICHAELS and
an individual,
Defendants.

* * * * *

NO. 01-90-CD
JURY TRIAL DEMANDED

Type of Pleading:

Praeclipe to Settle and Discontinue

Filed on behalf of:
Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa. I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

MAY 14 2001

William A. Shaw
Prothonotary

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

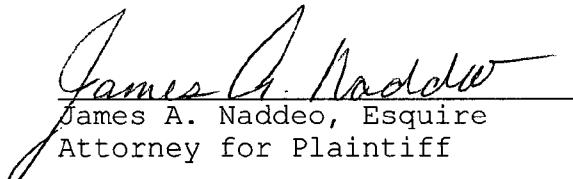
GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

PRAECIPE TO SETTLE AND DISCONTINUE

TO THE PROTHONOTARY:

Dear Sir:

Please mark the above-captioned case settled and
discontinued.


James A. Naddeo, Esquire
Attorney for Plaintiff

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

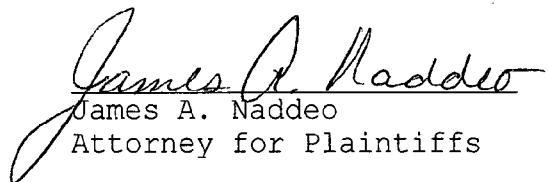
GARY L. GLASS and *
LINDA L. GLASS, *
husband and wife, *
Plaintiffs, *
*
v. * No. 01-90-CD
* JURY TRIAL DEMANDED
LONA MAY MICHAELS and *
an individual, *
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Praeclipe to Settle and Discontinue filed in the above-captioned action was served on the following person and in the following manner on the 14th day of May, 2001:

First-Class Mail, Postage Prepaid

James N. Horne, Esquire
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801


James A. Naddeo
Attorney for Plaintiffs

FILED

MAY 14 2001
013;35 | Cert. Due.
William A. Shaw
Prothonotary
to atty
copy to CA

Lap over margin

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

COPY

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

CIVIL DIVISION

**Gary L. Glass
Linda L. Glass**

**Vs.
Lona May Michaels**

No. 2001-00090-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 14, 2001 marked:

Settled and Discontinued

Record costs in the sum of \$109.34 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 14th day of May A.D. 2001.

William A. Shaw, Prothonotary