

01-234-CD
AMANDA SHERWOOD -vs- ROBIN WALTERS et al

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

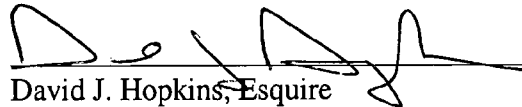
Defendants

No. 01-234-CD

PRAECIPE FOR WRIT OF SUMMONS

TO: Prothonotary

Please prepare and issue a Writ of Summons against Robin Walters and Nickolas
Suplizio, the above named Defendants.


David J. Hopkins, Esquire

Date: 2-14-2001

FILED

FEB 20 2001

William A. Shaw
Prothonotary

FILED

1900 FEB 27 1901

Wm A. Shaw
Prothonotary

Atty pd.
80.00

3 cc Atty

3 ltr to Sheriff

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

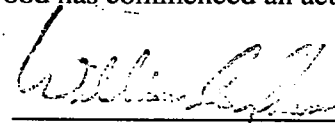
No. 01-234-CJ

WRIT OF SUMMONS

TO: Nickolas Suplizio
701 West Weber Avenue
DuBois, PA 15801

You are hereby notified that Amanda Sherwood has commenced an action against you.

Date: February 20, 2001



Prothonotary

Seal of Court:

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

No. 01-234-CD

WRIT OF SUMMONS

TO: Robin Walters
320 Sedgwick St.
Kane, PA 16735

You are hereby notified that Amanda Sherwood has commenced an action against you.

Date: _____

Prothonotary

Seal of Court:

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

AMANDA SHERWOOD,

Plaintiffs,

v.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants.

No. 01-234-C.D.

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

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT SUPLIZIO

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. No. 26908
KATHERINE V. OLIVER, ESQ.
I.D. No. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

MAR 05 2001

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiffs,

v.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants.

No. 01-234-C.D.

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

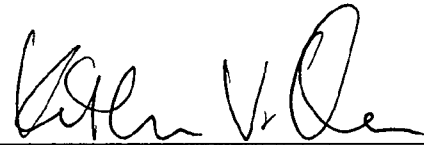
Please enter our appearance on behalf of the Defendant, Nicholas Suplizio, in the above-captioned matter.

We are authorized to accept service on behalf of Nicholas Suplizio.

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

Dated: March 24, 2001

By:



James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant Suplizio

811 University Drive

State College, PA 16801

(814) 238-4926

FILED

MAR 05 2001

MA 101MDC

William A. Shaw

Prothonotary



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

| | | |
|--------------------|---|-----------------|
| AMANDA SHERWOOD, | : | No. 01-234-C.D. |
| | : | |
| Plaintiffs, | : | |
| | : | |
| v. | : | |
| | : | |
| ROBIN WALTERS and | : | |
| NICHOLAS SUPLIZIO, | : | |
| | : | |
| Defendants. | : | |

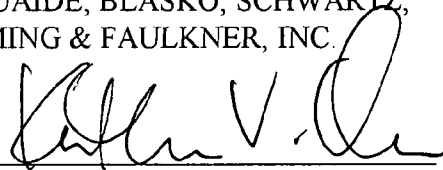
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praecipe for Entry of Appearance on behalf the Defendant Suplizio, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 24 day of March, 2001, to the attorneys/parties of record:

David Hopkins, Esquire
902 Beaver Drive
DuBois, PA 15801
(814) 375-0300

Ms. Robin Walters
320 Sedgwick Street
Kane, PA 16735

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 Suplizio
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

MAR 05 2001

William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10711

SHERWOOD, AMANDA

01-234-CD

VS.

WALTERS, ROBIN and NICKOLAS SUPLIZIO

WRIT OF SUMMONS

SHERIFF RETURNS

NOW FEBRUARY 22, 2001 AT 11:57 AM EST SERVED THE WITHIN SUMMONS ON NICKOLAS SUPLIZIO, DEFENDANT AT RESIDENCE, 701 WEST WEBER AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CRYSTAL SUPLIZIO, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET

NOW FEBRUARY 20, 2001 DONALD MOREY, SHERIFF OF McKEAN COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN SUMMONS ON ROBIN WALTERS, DEFENDANT.

NOW FEBRUARY 28, 2001 SERVED THE WITHIN SUMMONS ON ROBN WALTERS DEFENDANT BY DEPUTIZING THE SHERIFF OF McKEAN COUNTY. THE RETURN OF SHERIFF MOREY IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.

Return Costs

| Cost | Description |
|-------|------------------------------|
| 43.56 | SHFF. HAWKINS PAID BY: ATTY. |
| 45.10 | SHFF. MOREY PAID BY: ATTY. |
| 20.00 | SURCHARGE PAID BY: ATTY. |

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10711

SHERWOOD, AMANDA

01-234-CD

VS.

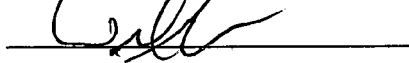
WALTERS, ROBIN and NICKOLAS SUPLIZIO

WRIT OF SUMMONS

SHERIFF RETURNS

Sworn to Before Me This

6 Day Of March 2001



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

So Answers,



Chester A. Hawkins
Sheriff

FILED

MAR 06 2001

0/3:00/07

William A. Shaw
Prothonotary

AFFIDAVIT OF SERVICE.

Amanda Sherwood

Versus

Robin Walters, et al

**IN THE COURT OF COMMON PLEAS
OF McKEAN COUNTY**

No. Clearfield County, PA

STATE OF PENNSYLVANIA
COUNTY OF McKEAN

} SS:

James Babcock, Deputy Sheriff

being duly sworn according to law, deposes and says, that

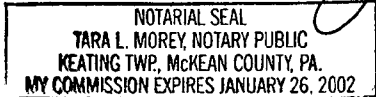
Served the Writ of Summons filed in this suit upon Robin Walters,
defendant named within by handing a certified copy of same to
her personally at her place of employment Kane Community Hoospital,
Kane, McKean County, Pennsylvania making known to her the contents
thereof at 8:15 a.m., E.S.T. on February 28, A.D. 2001.

Sworn to and subscribed before me this

So Answers

1st day of March A.D. 2001

Tara L. Morey



Donald D. Morey

..... Sheriff

James Babcock

..... Deputy

No. Clearfield County, PA

Amanda Sherwood

vs.

Robin Walters, et al

AFFIDAVIT OF SERVICE

Writ of Summons

Paid _____ \$ _____

Chester Hawkins, Sheriff

Attorney for the Plaintiff



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

SUITE 116
1 NORTH SECOND STREET - COURTHOUSE
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641
AFTER 4:00 P.M. (814) 765-1533
CLEARFIELD COUNTY FAX
(814) 765-6089

DARLENE SHULTZ
CHIEF DEPUTY

MARGARET PUTT
OFFICE MANAGER

MARILYN HAMM
DEPT. CLERK

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD

NO. 01-234-CD

VS

ACTION: WRIT OF SUMMONS

ROBIN WALTERS al

SERVE BY: 3/21/01

Or

HEARING DATE:

SERVE:

ROBIN WALTERS

ADDRESS:

320 Sedgwick St., Kane, Pa. 16735

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF of CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF of McKEAN COUNTY Pennsylvania to execute this writ.

This Deputation being made at the request and risk of the Plaintiff this 20th day of FEBRUARY 2001.

Respectfully,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY

MAKE REFUND PAYABLE TO:

HOPKINS LAW FIRM

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 CD

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

ENTRY OF APPEARANCE

Please enter my appearance for Defendant, Robin Walters only, in the above matter. Papers may be served at the address listed below.

DEMAND FOR JURY TRIAL

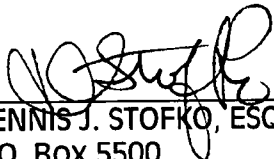
Pursuant to Rule 1007.1 of the Pennsylvania Rules of Civil Procedure, as amended, a Jury Trial is demanded on all issues raised by the pleadings in this action.

I certify this Entry of Appearance and Demand for Jury Trial shall be served forthwith by ordinary mail upon all parties.

FILED

MAR 06 2001

William A. Shaw
Prothonotary


DENNIS J. STOFKO, ESQUIRE
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID 27638

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

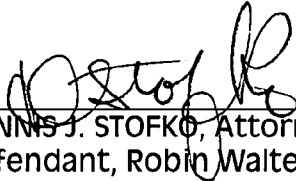
No. 01-234 CD

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

PRAECIPE

Please issue a rule on plaintiff to file here complaint within 20 days
or suffer judgment non pros.



DENNIS J. STOFKO, Attorney for
Defendant, Robin Walters

COPY

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

Amanda Sherwood
Plaintiff

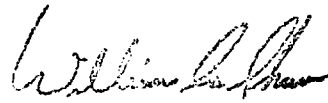
Vs.
Robin Walters
Nickolas Suplizio,
Defendants

Case No. #2001-00234-CD

RULE TO FILE COMPLAINT

TO: Amanda Sherwood, Plaintiff

YOU ARE HEREBY RULED to file a Complaint in the above-captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.



William A. Shaw, Prothonotary

Dated: March 6, 2001

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

David Hopkins, Esq
900 Beaver Dr
Dubois IA 15801

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

☐ Agent☐ Addressee

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail☐ Registered ☐ Return Receipt for Merchandise☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

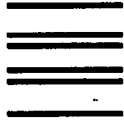
2. Article Number (Copy from service label)

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Law Offices
DENNIS J. STOFKO
969 Eisenhower Blvd.
P.O. Box 5500
Johnstown, Pennsylvania 15904

Watson

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.


No. 2001-234 CD

ROBIN WALTERS and NICHOLAS
SUPLIZIO,

Defendants

AFFIDAVIT OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the Rule to File Complaint was served via U.S. Mail, postage prepaid, on David Hopkins, Attorney for Plaintiff, on March 8, 2001 as indicated by the attached return receipt card.



DENNIS J. STOFKO, Attorney for
Defendant, Robin Walters

Sworn to and subscribed before
me this 15th day of March, 2001.


Notary Public

Notarial Seal
Deborah L. Doll, Notary Public
Richland Twp., Cambria County
My Commission Expires Jan. 27, 2002
Member, Pennsylvania Association of Notaries

FILED

MAR 16 2001
mld:07 mdc
William A. Shaw
Prothonotary 

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

Amanda Sherwood
Plaintiff

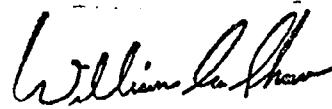
Vs.
Robin Walters
Nickolas Suplizio,
Defendants

Case No. #2001-00234-CD

RULE TO FILE COMPLAINT

TO: Amanda Sherwood, Plaintiff

YOU ARE HEREBY RULED to file a Complaint in the above-captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.



William A. Shaw, Prothonotary

Dated: March 6, 2001

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

No. 01-234 C.D.

Type of Pleading: Complaint

Filed on behalf of: Amanda Sherwood,
Plaintiff.

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

MAR 19 2001

01/12/01 WS
William A. Shaw
Prothonotary

1 chm to Arty

[Signature]

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

NOTICE

TO DEFENDANTS:

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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

COMPLAINT

AND NOW, comes Plaintiff, Amanda Sherwood, by and through her attorneys,
The Hopkins Law Firm, and states as follows:

1. Plaintiff, Amanda Sherwood, is an adult individual maintaining a principal residence at R.D. #2, Box 252, DuBois, Pennsylvania 15801.
2. Defendant, Robin Walters, is an adult individual maintaining a principal residence at 320 Sedgwick Street, Kane, Pennsylvania 16735.
3. Defendant, Nickolas Suplizio, is an adult individual maintaining a principal residence at 701 West Weber Avenue, DuBois, Pennsylvania 15801.
4. On February 27, 1999, Amanda Sherwood was a passenger in a 1996 Jeep Cherokee driven by Defendant, Nickolas Suplizio. Mr. Suplizio was stopped at a red traffic light at the intersection of Park Place and Liberty Boulevard in the City of DuBois waiting for the traffic light to turn green so he could make a left hand turn. The light turned green and Mr. Suplizio proceeded.
5. At the same time and general location, the Defendant, Robin Walters, was traveling north on Liberty Boulevard, where she failed to stop for a red traffic light striking Defendant, Nickolas Suplizio's, vehicle as he was making a left hand turn.

6. The Defendant, Robin Walters' vehicle struck the left front end of Defendant Nickolas Suplizio's vehicle.

7. The aforesaid accident resulted in personal injuries to Plaintiff, Amanda Sherwood

8. The Defendants, Robin Walters and Nickolas Suplizio, were operating their motor vehicles in a negligent, careless and reckless manner so as to cause their motor vehicles to collide. The negligence, carelessness and recklessness of Defendants consisted of the following:

- a. Operating their motor vehicles without due regard to the rights, safety and well being and position of Plaintiff under the current circumstances;
- b. Failing to maintain a safe speed;
- c. Failing to maintain a vigilant lookout for other vehicles;
- d. Failing to stop at traffic light;
- e. Traveling too fast for conditions; and
- f. Driving their motor vehicles so as to cause a collision.

9. As a direct, proximate, natural, foreseeable and probable consequence of Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, was placed in immediate peril and suffered severe injuries and other injuries which may yet develop.

10. As a direct result of the Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, has suffered, and will suffer in the future, great pain agony and inconvenience.

11. As a direct and proximate result of the Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, has incurred, and will in the future incur expenses for medical treatment in an amount not yet ascertained.

12. As a direct and proximate result of the Defendants' negligence and reckless conduct, Plaintiff, Amanda Sherwood, was prevented from attending to her usual duties of employment, causing loss of income and in the future incurred earning losses by not being able to achieve her full employment potential.

13. As a direct and proximate result of Defendants' negligence, careless and reckless conduct, Plaintiff has suffered and will continue to suffer loss in the quality of her life.

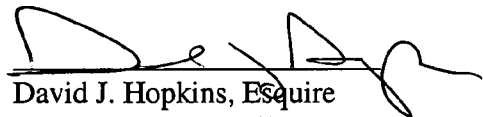
14. Defendants are liable for Plaintiff's injuries described herein, inasmuch as Plaintiff's injuries are the direct, proximate, natural, foreseeable and probable consequences of Defendants' negligence, carelessness and recklessness as set forth herein.

WHEREFORE, Plaintiff, Amanda Sherwood, demands judgment be entered in her favor against Defendants, Robin Walters and Nickolas Suplizio, in an amount in excess of \$20,000.00, together with interest, cost of suit damages for delay and such other relief as the Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demand a trial by twelve jurors on all issues presented herein.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.

Date: 3/16/01


Amanda Sherwood

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

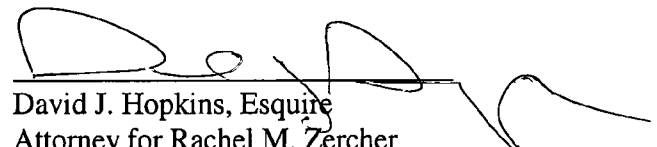
| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICHOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Complaint
filed on behalf of Amanda Sherwood was forwarded on the 19th day of March, 2001,
by U.S. Mail, postage prepaid, to all counsel of record, addressed as follows:

Dennis J. Stofko, Esquire
R. Thomas Strayer Law Office
969 Eisenhower Boulevard, Suite E
P.O. Box 5500
Johnstown, PA 15904

Katherine V. Oliver, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801


David J. Hopkins, Esquire
Attorney for Rachel M. Zercher
Supreme Court No. 42519

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

No. 01-234 C.D.

Type of Pleading: Amended
Complaint

Filed on behalf of: Amanda Sherwood,
Plaintiff.

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

APR 02 2001

William A. Shaw
Prothonotary

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

NOTICE

TO DEFENDANTS:

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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| Defendants | : | |

COMPLAINT

AND NOW, comes Plaintiff, Amanda Sherwood, by and through her attorneys,
The Hopkins Law Firm, and states as follows:

1. Plaintiff, Amanda Sherwood, is an adult individual maintaining a principal residence at R.D. #2, Box 252, DuBois, Pennsylvania 15801.
2. Defendant, Robin Walters, is an adult individual maintaining a principal residence at 320 Sedgwick Street, Kane, Pennsylvania 16735.
3. Defendant, Nickolas Suplizio, is an adult individual maintaining a principal residence at 701 West Weber Avenue, DuBois, Pennsylvania 15801.
4. On February 27, 1999, Amanda Sherwood was a passenger in a 1996 Jeep Cherokee driven by Defendant, Nickolas Suplizio. Mr. Suplizio was stopped at a red traffic light at the intersection of Park Place and Liberty Boulevard in the City of DuBois waiting for the traffic light to turn green so he could make a left hand turn. The light turned green and Mr. Suplizio proceeded.
5. At the same time and general location, the Defendant, Robin Walters, was traveling north on Liberty Boulevard, where she failed to stop for a red traffic light striking Defendant, Nickolas Suplizio's, vehicle as he was making a left hand turn.

6. The Defendant, Robin Walters' vehicle struck the left front end of Defendant Nickolas Suplizio's vehicle.

7. The aforesaid accident resulted in personal injuries to Plaintiff, Amanda Sherwood consisting of lower back, hand, shoulder, neck injuries, myofascial injuries and kyphosis as well as other injuries all of which are permanent and serious in nature

8. The Defendants, Robin Walters and Nickolas Suplizio, were operating their motor vehicles in a negligent, careless and reckless manner so as to cause their motor vehicles to collide. The negligence, carelessness and recklessness of Defendants consisted of the following:

- a. Operating their motor vehicles without due regard to the rights, safety and well being and position of Plaintiff under the current circumstances;
- b. Failing to maintain a safe speed;
- c. Failing to maintain a vigilant lookout for other vehicles;
- d. Failing to stop at traffic light;
- e. Traveling too fast for conditions; and
- f. Driving their motor vehicles so as to cause a collision.

9. As a direct, proximate, natural, foreseeable and probable consequence of Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, was placed in immediate peril and suffered severe neck and back injuries and other injuries which may yet develop.

10. As a direct result of the Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, has suffered, and will suffer in the future, great pain agony and inconvenience.

11. As a direct and proximate result of the Defendants' negligence, carelessness and reckless conduct, Plaintiff, Amanda Sherwood, has incurred, and will in

the future incur expenses for medical treatment in an amount not yet ascertained.

12. As a direct and proximate result of the Defendants' negligence and reckless conduct, Plaintiff, Amanda Sherwood, was prevented from attending to her usual duties of employment, causing loss of income and in the future incurred earning losses by not being able to achieve her full employment potential.

13. As a direct and proximate result of Defendants' negligence, careless and reckless conduct, Plaintiff has suffered and will continue to suffer loss in the quality of her life.

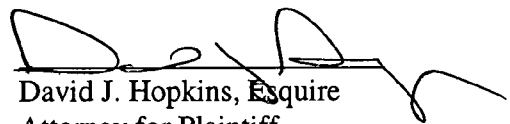
14. Defendants are liable for Plaintiff's injuries described herein, inasmuch as Plaintiff's injuries are the direct, proximate, natural, foreseeable and probable consequences of Defendants' negligence, carelessness and recklessness as set forth herein.

WHEREFORE, Plaintiff, Amanda Sherwood, demands judgment be entered in her favor against Defendants, Robin Walters and Nickolas Suplizio, in an amount in excess of \$20,000.00, together with interest, cost of suit damages for delay and such other relief as the Court deems just and appropriate.

DEMAND FOR JURY TRIAL


Plaintiff demand a trial by twelve jurors on all issues presented herein.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.


Amanda M. Sherwood

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

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 C.D.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

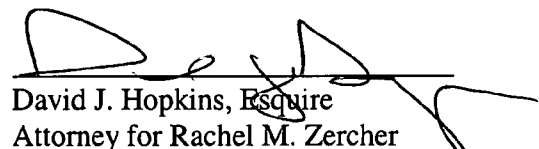
Defendants

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Complaint
filed on behalf of Amanda Sherwood was forwarded on the 2nd day of April, 2001,
by U.S. Mail, postage prepaid, to all counsel of record, addressed as follows:

Dennis J. Stofko, Esquire
R. Thomas Strayer Law Office
969 Eisenhower Boulevard, Suite E
P.O. Box 5500
Johnstown, PA 15904

Katherine V. Oliver, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801


David J. Hopkins, Esquire
Attorney for Rachel M. Zercher
Supreme Court No. 42519

FILED

APR 02 2001

012451166

William A. Shaw

Prothonotary

atly Hopkin
Shaw

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

AMANDA SHERWOOD

Plaintiff,

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

) No.: 01-234-CD
)
)
) TYPE OF CASE: CIVIL
)
)
) Type of Pleading:
) ANSWER, NEW MATTER AND NEW
) MATTER CROSS-CLAIM TO PLAINTIFF'S
) COMPLAINT
)
)
) Filed on Behalf of Defendant
) NICHOLAS SUPLIZIO
)
)
) Counsel of Record for this
) Party: KATHERINE V. OLIVER
)
)
) Court I.D. No.: 77069
)
)
) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
)
)
) 811 University Drive
) State College, PA 16801
) (814) 238-4926
)

Dated: 4/20/01

FILED

APR 23 2001

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

NOTICE TO PLEAD

TO: AMANDA SHERWOOD
c/o David J. Hopkins, Esquire

ROBIN WALTERS
c/o

YOU ARE HEREBY notified to file a written response to the enclosed Answer,
New Matter and New Matter Cross-Claim within twenty (20) days from the date of service
hereof or a judgment may be entered against you.

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

By: 

Katherine V. Oliver
Attorney for Defendant
NICHOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926

Dated: 4-20-01

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

**DEFENDANT SUPLIZIO'S ANSWER WITH NEW
MATTER AND NEW MATTER CROSS-CLAIM
TO PLAINTIFF'S COMPLAINT**

AND NOW comes Defendant, NICHOLAS SUPLIZIO, by and through his attorneys,
McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC., and files the within
Answer with New Matter to Plaintiff's Complaint:

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

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

3. Admitted.

4. Admitted. By way of further response, Mr. Suplizio took all proper precautions
prior to proceeding, and, acted with due care and caution for the circumstances then and there
existing.

5. Admitted.

6. Admitted.

7. Denied. After reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 7. The same are therefore denied and strict proof thereof demanded.

8. Denied. The averments of paragraph 8 are denied in accordance with Pennsylvania Rule of Civil Procedure 1029(e). It is expressly denied that Nicholas Suplizio operated his motor vehicle in a negligent, careless and/or reckless manner.

9. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 9 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 9 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

10. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 10 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 10 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

11. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 11 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the

averments of paragraph 11 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

12. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 12 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 12 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

13. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 13 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 13 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

14. Denied. It is denied that Nicholas Suplizio acted in a negligent, careless and/or reckless manner. By way of further response, the averments of paragraph 14 constitute legal conclusions to which no response is required. Finally, after reasonable investigation, Defendant Suplizio is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 14 relating to Plaintiff's alleged injuries and/or damages. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Nicholas Suplizio respectfully requests that judgment be entered in his favor and that Plaintiff's Complaint against him be dismissed, with prejudice and costs of suit.

NEW MATTER

15. The averments of paragraphs 1 through 14, inclusive, are incorporated herein by reference as though set forth at length.

16. To the extent that Plaintiff elected and/or was insured under a policy of insurance bearing a limited tort option, Plaintiff's claims herein are barred or reduced accordingly.

17. To the extent that Plaintiff's medical expenses and/or wage losses were paid or are payable under a policy of insurance, the same may not be plead, proven or recovered in the instant action.

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

19. Defendant hereby raises and asserts the defenses of contributory negligence, comparative negligence and/or assumption of the risk.

20. Defendant hereby raises the defense of the statute of limitations.

21. Plaintiff's Complaint fails to state a cause of action against Defendant Nicholas Suplizio.

NEW MATTER CROSS-CLAIM PURSUANT TO
Pa. R.C.P. 2252(d)

22. The averments of paragraphs 1 through 21, inclusive, are incorporated herein by reference as though set forth at length.

23. In the event of a finding of liability on the part of Defendant Nicholas Suplizio, which liability is expressly denied, then in that event, Defendant Suplizio asserts that Defendant Robin Walters is solely and jointly and severally liable for the matters set forth in Plaintiff's Complaint for the reasons set forth in Plaintiff's Complaint and Defendant Suplizio's Answer as

set forth above.

24. In the event of a finding of liability on the part of Defendant Suplizio, any liability being expressly denied, then, in that event, Defendant Suplizio asserts that he is entitled to indemnification and/or contribution from Defendant Robin Walters for the reasons set forth in Plaintiff's Complaint and Defendant Suplizio's Answer as set forth above.

WHEREFORE, Defendant Nicholas Suplizio denies any and all liability to Plaintiff. In the event of a finding of liability on the part of Defendant Nicholas Suplizio, any liability being expressly denied, then, in that event, Defendant Suplizio asserts that he is entitled to indemnification and/or contribution from Defendant Robin Walters.

Respectfully submitted,

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

By: 

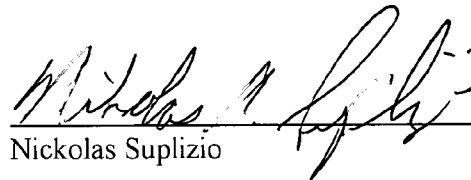
Katherine V. Oliver
Attorneys for Defendant
NICHOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

Dated: 4-20-01

Sherwood v Walters and Suplizio

VERIFICATION

The undersigned verifies that he is authorized to make this verification on his own behalf; and that the statements made in the foregoing **DEFENDANT NICKOLAS SUPLIZIO'S ANSWER WITH NEW MATTER AND NEW MATTER CROSS-CLAIM** are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. §4904, related to unsworn falsification to authority.



Nickolas Suplizio

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Nicholas Suplizio's Answer, New Matter Cross-Claim to Plaintiff's Complaint, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid this 20th day of April, 2001 to the attorney/parties of record.

David Hopkins, Esquire
902 Beaver Drive
DuBois, PA 15801

Ms. Robin Walters
320 Sedgwick Street
Kane, PA 16835

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

BY


KATHERINE V. OLIVER

Attorneys for Defendant Suplizio
811 University Drive
State College, PA 16801

FILED

APR 23 2001

William A. Shaw
Prothonotary

NO: 1
CE
(121)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

No. 01-234 CD

ANSWER AND NEW MATTER
Counsel of record for this party:
Dennis J. Stofko, Esquire
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID 27638

TO THE PARTIES:

You are hereby notified to reply to
the enclosed New Matter within 20
days from service hereof or a default
judgment may be entered against you.

FILED

APR 30 2001

William A. Shaw
Prothonotary

ANSWER AND NEW MATTER

NOW COMES the Defendant, Robin Walters by and through counsel,
Dennis J. Stofko and files the following Answer and New Matter.

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted in part, denied in part. It is admitted that the plaintiff was a passenger in the vehicle operated by Defendant, Nickolas Suplizio. The balance of the averment is denied in that after reasonable investigation defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

5. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

6. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

7. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

8. Denied. Paragraph 8 contains conclusions of law to which no responsive pleading is required.

9. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

10. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

11. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

12. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

13. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

14. Denied. After reasonable investigation Defendant is without sufficient knowledge or information to form a belief as to the truth of the averment and proof thereof is required at the time of trial.

WHEREFORE, Defendant Robin Walters requests Plaintiff's Complaint be dismissed.

NEW MATTER

15. The accident described in Plaintiff's complaint occurred on February 27, 1999 which date was subsequent to the effective date of the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. CSA Chapter 17.

16. The Defendant, Robin Walters pleads the said Motor Vehicle Financial Responsibility Law as a defense to the extent that said law limits and controls Plaintiff's right to recover damages in this action.

WHEREFORE, Defendant Robin Walters requests judgment on her behalf.

NEW MATTER UNDER 2252(d)

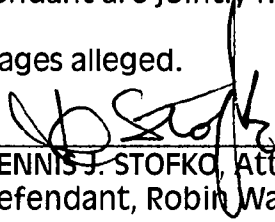
17. The Defendant, Robin Walters joins Nickolas Suplizio as additional defendant pursuant to Pa. RCP 2252(d).

18. The Defendant, Robin Walters incorporates by reference the allegations of Plaintiff's Complaint as if the same were here set forth at length.

19. If it is determined at the trial of this action that Plaintiff has sustained any injury as a result of the alleged accident, said injuries or damages were the result of the negligence of Nickolas Suplizio and therefore he is liable to the Plaintiff jointly and severally.

WHEREFORE, the Defendant, Robin Walters requests that Nickolas Suplizio be joined as additional defendant in the original suit because he is

solely responsible for the damages alleged in the complaint or in the alternative so as to protect Defendant Walter's right of contribution and/or indemnity, if on the trial of the action it should be found that the Plaintiff, original Defendants and Additional Defendant are jointly negligent in causing the accident which resulted in the damages alleged.

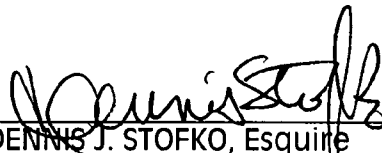


DENNIS J. STOFKO, Attorney for
Defendant, Robin Walters

I, Dennis J. Stofko, do hereby state that I am the attorney for Defendant, Robin Walters, and that as such, being authorized to do so, state that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief. This verification of counsel is being attached hereto in lieu of that of Defendant because of the inability to obtain a verification from Defendant in the time required to file this answer. A verification of Defendant will be provided if requested.

This statement is made subject to the provisions of 18 Pa CSA 4904 relating to unsworn falsification to authorities.

Dated: 27 April 01


DENNIS J. STOFKO, Esquire

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

No. 01-234 C.D.

Type of Pleading: Answer to New Matter

Filed on behalf of: Amanda Sherwood,
Plaintiff.

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

MAY 01 2001

William A. Shaw
Prothonotary

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| Defendants | : | |

ANSWER TO NEW MATTER

AND NOW, comes Plaintiff, Amanda Sherwood, by and through her attorneys, The Hopkins Law Firm, and answers New Matter of Defendant Nickolas Suplizio as follows:

15. No answer is required of this paragraph.

16. Denied. Plaintiff selected the full tort option and consequently, her claims are neither barred nor reduced.

17. Admitted in part and denied in part. Plaintiff admits that to the extent her medical expenses and or wage losses were paid under her first party automobile benefits then same may not be recovered in the instant action. To the extent medical expenses were paid by other policies of insurance, they are recoverable in the instant action.

18. No answer is required to paragraph 18.

19. Denied. Plaintiff undertook no course of conduct which could be described as contributory negligence, comparative negligence or did Plaintiff assume any risks.

20. Denied. Plaintiff commenced a cause of action within two (2) years of the date of the accident.

21. Denied. Plaintiff has plead a cause of action in negligence against Defendant Nickolas Suplizio.

WHEREFORE, Defendant Nickolas Suplizio's New Matter should be dismissed with prejudice.

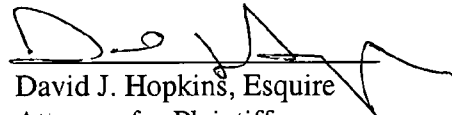
ANSWER TO NEW MATTER CROSS-CLAIM
PURSUANT TO Pa.R.C.P. 2252(d)

22. No answer is required of Plaintiff.

23. No answer is required of Plaintiff.

24. No answer is required of Plaintiff.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiff

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


| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Answer to New Matter of Defendant Nickolas Suplizio, filed on behalf of Amanda Sherwood was forwarded on the 1st day of May, 2001, by U.S. Mail, postage prepaid, to all counsel of record, addressed as follows:

Dennis J. Stofko, Esquire
R. Thomas Strayer Law Office
969 Eisenhower Boulevard, Suite E
P.O. Box 5500
Johnstown, PA 15904

Katherine V. Oliver, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801


David J. Hopkins, Esquire
Attorney for Amanda Sherwood
Supreme Court No. 42519

FILED
01/11/24
MAY 01 2001
William A. Shaw
Prothonotary

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
and NICKOLAS SUPLIZIO

Defendants

No. 01-234 C.D.

Type of Pleading: Answer to New Matter
of Defendant Robin Walters

Filed on behalf of: Amanda Sherwood,
Plaintiff.

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

MAY 03 2001

m12:10/nc
William A. Shaw
Prothonotary

[Signature]

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

| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| Defendants | : | |

ANSWER TO NEW MATTER OF DEFENDANT ROBIN WALTERS

AND NOW, comes Plaintiff, Amanda Sherwood, by and through her attorneys,
The Hopkins Law Firm, and answers New Matter of Defendant Robin Walters as
follows:

15. Admitted.

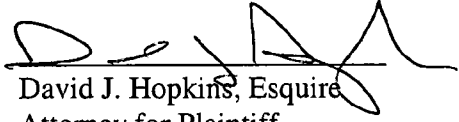
16. Admitted in part and denied in part. Plaintiff admits motor vehicle
financial responsibility law is applicable to the case at bar and to some extent controls
and limits Plaintiff's right to recover certain items of damage. However, Plaintiff denies
the Motor Vehicle Financial Responsibility Law is a total defense to Plaintiff's claims.
To the extent paragraph 16 of Defendant Robin Walter's New Matter suggests same, it is
specifically denied.

WHEREFORE, Plaintiff respectfully requests the New Matter of Robin Walters
be dismissed with prejudice.

ANSWER TO NEW MATTER UNDER 2252(d)

17. No answer is required of this paragraph.
18. No answer is required of this paragraph.
19. No answer is required of this paragraph.

Respectfully submitted,



David J. Hopkins, Esquire
Attorney for Plaintiff

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

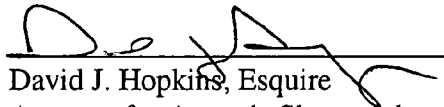
| | | |
|-----------------------|---|-----------------|
| AMANDA SHERWOOD, | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| vs. | : | No. 01-234 C.D. |
| | : | |
| ROBIN WALTERS and | : | |
| and NICKOLAS SUPLIZIO | : | |
| | : | |
| Defendants | : | |

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Answer to New Matter of Defendant Robin Walters, filed on behalf of Amanda Sherwood was forwarded on the 2nd day of May, 2001, by U.S. Mail, postage prepaid, to all counsel of record, addressed as follows:

Dennis J. Stofko, Esquire
R. Thomas Strayer Law Office
969 Eisenhower Boulevard, Suite E
P.O. Box 5500
Johnstown, PA 15904

Katherine V. Oliver, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801


David J. Hopkins, Esquire
Attorney for Amanda Sherwood
Supreme Court No. 42519

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

No. 01-234 CD

DEFENDANT WALTERS' REPLY
TO NEW MATTER UNDER
2252(d)

Counsel of record for this party:
Dennis J. Stofko, Esquire
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID 27638

FILED

2011-01-20

William A. Staw
Clerk

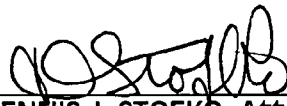
DEFENDANT WALTERS' REPLY TO NEW MATTER UNDER 2252(d)

NOW COMES the Defendant, Robin Walters by and through counsel, Dennis J. Stofko and files the following Reply to New Matter under 2252(d).

23. Denied. Paragraph 23 contains a conclusion of law to which no responsive pleading is required.

24. Denied. Paragraph 24 contains a conclusion of law to which no responsive pleading is required.

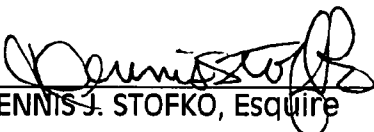
WHEREFORE, Defendant, Robin Walters requests judgment on her behalf.



DENNIS J. STOFKO, Attorney for
Defendant, Robin Walters

I, Dennis J. Stofko, do hereby state that I am the attorney for Defendant and that as such, being authorized to do so, state that the facts set forth in the foregoing Reply to New Matter under 2252(d) are true and correct to the best of my knowledge, information and belief. This verification of counsel is being attached hereto in lieu of that of Defendant because of the inability to obtain a verification from Defendant in the time required to file this Answer. A verification of Defendant will be provided if requested.

This statement is made subject to the provisions of 18 Pa CSA 4904 relating to unsworn falsification to authorities.


DENNIS J. STOFKO, Esquire

Dated: 4 May 01

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

DEFENDANT SUPLIZIO'S RESPONSE TO
DEFENDANT ROBIN WALTERS' NEW MATTER
UNDER 2252(d)

17. The averments of paragraph 17 constitute legal conclusions to which no response is required. By way of further response, Defendant Nickolas Suplizio denies that he was negligent and denies any liability to Plaintiff and/or Defendant Robin Walters pursuant to Pa. R.C.P. 2252(d) or otherwise.

18. Defendant Nickolas Suplizio hereby incorporates by reference the allegations of Defendant Suplizio's Answer with New Matter and New Matter Pursuant to Rule 2252(d), filed on April 20, 2001, as though set forth at length herein.

19. The averments of paragraph 19 constitute legal conclusions to which no response is required. By way of further response, Defendant Nickolas Suplizio denies that he was negligent and denies any liability to Plaintiff and/or Defendant Robin Walters pursuant to Pa. R.C.P. 2252(d) or otherwise. By way of further response, please see Defendant Nickolas Suplizio's Answer with New Matter to Plaintiff's Complaint and New Matter Pursuant to Pa.

R.C.P. 2252(d)
FILED

WHEREFORE, Defendant Nickolas Suplizio respectfully requests that all claims against
MAY 10 2001

William A. Shaw
Prothonotary

him be dismissed, with prejudice and costs of suit.

Respectfully submitted,

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

By: 

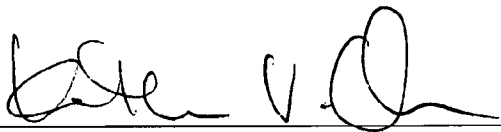
Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

Dated: 5-9-01

Sherwood v. Walters and Suplizio

VERIFICATION

Katherine V. Oliver, Esquire, hereby verifies that she is the Attorney of Record for Defendant NICKOLAS SUPLIZIO in the foregoing action, and as such, she is authorized to make this Affidavit on his behalf, and that the facts set forth in the foregoing **DEFENDANT NICKOLAS SUPLIZIO'S RESPONSE TO DEFENDANT ROBIN WALTERS' NEW MATTER UNDER 2252(d)** are true and correct to the best of her information, knowledge and belief. This verification is made by the attorney of record instead of the Defendant in that the pleading is based on a pleading previously verified by the client, and the additional and/or changed averments are statements of legal defenses and/or facts within the undersigned's personal knowledge and belief. This Verification is hereby made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.


Katherine V. Oliver

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

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No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

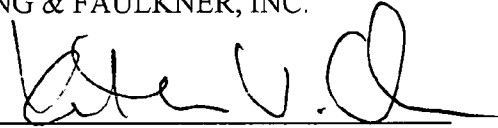
I hereby certify that a true and correct copy of Defendant Nickolas Suplizio's Response to Defendant Robin Walters' New Matter Under 2252(d) in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 8th day of May, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
R. Thomas Strayer Law Offices
969 Eisenhower Boulevard Suite E
PO Box 5500
Johnstown, PA 15904

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

By: _____

A handwritten signature in black ink, appearing to read "Katherine V. Oliver", written over a horizontal line.

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

1 -

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 CD

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

FILED

MAY 11 2001

m/1:45pm

William A. Shaw

Prothonotary

WAS

I, Robin Walters, do hereby swear or affirm that the facts set forth in the Answer, New Matter and New Matter under 2252(d) are correct to the best of my knowledge, information and belief.

I understand that these averments of fact are made subject to the penalties of 18 Pa. CSA 4904 relating to unsworn falsification to authorities.


Robin Walters

Dated: 4/2/01

CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 CD

ROBIN WALTERS and NICKOLAS
SUPLIZIO,

Defendants

MOTION TO COMPEL

Counsel of record for this party:
Dennis J. Stofko, Esquire
P.O. Box 5500
Johnstown, Pa. 15904
814 262-0064
ID27638

FILED

JUN 2 2001


William A. Shew
Clerk

MOTION TO COMPEL

NOW COMES the Defendant, Robin Walters by and through counsel, Dennis J. Stofko and files the following Motion to Compel.

1. Plaintiff initiated the above cause of action as a result of an accident occurring on February 27, 1999.
2. On May 2, 2001 Defendant served interrogatories and a request for production of documents on plaintiff's counsel with the notice to answer within 30 days.
3. By letter dated June 12, 2001 counsel inquired as to the status of the discovery.
4. The discovery requested is necessary and relevant with regard to claims being asserted by the plaintiff to the within cause of action and are reasonable in scope.
5. Defendant is entitled to an order compelling Plaintiff to respond to the interrogatories and request for production pursuant to Rule 4019 of the Pennsylvania Rules of Civil Procedure.

WHEREFORE, Defendant, Robin Walters requests that this Court compel Plaintiff to answer said discovery as requested or to suffer such sanctions as the Court shall impose.



DENNIS J. STOFKO, Attorney for
Defendant, Robin Walters

FILED

JUN 22 2001

m/a.001mcc

William A. Shaw
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 CD

ROBIN WALTERS and NICKOLAS
SUPLIZIO,

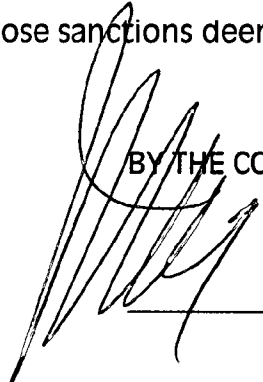
Defendants

ORDER

AND NOW this 25th day of June, 2001 upon consideration of the
foregoing Motion to Compel,

IT IS HEREBY ORDERED, DIRECTED AND DECREED that the Plaintiff shall have
thirty (30) days from the date of this order to respond to said interrogatories and
request for production or suffer those sanctions deemed appropriate by the
Court.

BY THE COURT.



FILED

JUN 25 2001

William A. Shaw
Prothonotary

FILED

JUN 25 2001

012381 cc atty Syko
William A. Shaw
Prothonotary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Deposition Directed to Robin Walters in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 6th day of August, 2001,, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 1504-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 07 2001

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Defendant Nickolas Suplizio's
Interrogatories for Answer by Defendant Robin Walters (Set One) and Request for Production of
Documents (Set One) in the above-captioned matter was mailed by regular mail, postage
prepaid, at the Post Office, State College, Pennsylvania, on this 7th day of August, 2001, to the
attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 08 2001

William A. Shaw
Prothonotary

W.A.S.
FILED
MAY 12 1951
WILLIAM A. SNOW
PROSECUTORY

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

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 Nickolas Suplizio Directed to Defendant Robin Walters (Set Two) in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 08 2001

William A. Shaw
Prothonotary

FILED
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AUG 11 1901
William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Defendant Suplizio's Interrogatories for Answer by Plaintiff and Request for Production (Set One) in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 07 2001

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

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 Nickolas Suplizio Directed to Plaintiff in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 7th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver

I.D. No. 77069

Attorneys for Defendant

NICKOLAS SUPLIZIO

811 University Drive

State College, PA 16801

(814) 238-4926

Fax: (814) 238-9624

FILED

AUG 09 2001

William A. Shaw
Prothonotary

FILED
AUG 13 1964
WILLIAM A. SAW
PROthonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

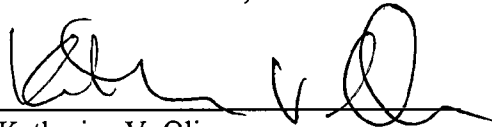
I hereby certify that a true and correct copy of the Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery Pursuant to Rule 4009.22 in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 10th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: _____


Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 13 2001

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

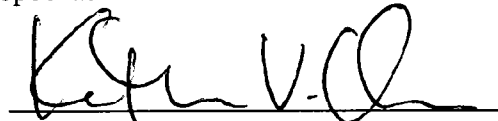
No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

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 Nickolas Suplizio 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 20 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 objections to the subpoenas have 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.




Katherine V. Oliver
Attorney for Defendant
NICKOLAS SUPLIZIO

Dated: 8-30-01

FILED

AUG 31 2001

m/1:47/noce
William A. Shaw
Prothonotary 

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

*

Vs.

*

No. 2001-00234-CD

Robin Walters
Nickolas Suplizio
Defendant(s)

*

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

TO: DUBOIS REGIONAL MEDICAL CENTER
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:
SEE ATTACHED

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Wednesday, August 08, 2001
Seal of the Court


Deputy

Dubois Regional Medical Center

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, outpatient physical therapy notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

*

Vs.

*

No. 2001-00234-CD

Robin Walters
Nickolas Suplizio
Defendant(s)

*

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

TO: HealthSouth/Nittany Valley Rehabilitation Hospital
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

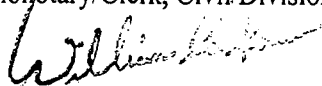
TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



DATE: Thursday, August 09, 2001
Seal of the Court

Deputy

HealthSouth/Nittany Valley Rehabilitation Hospital

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

Vs.

Robin Walters
Nickolas Suplizio
Defendant(s)

No. 2001-00234-CD

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

TO: Keystone Rehabilitatoin Systems

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Wednesday, August 08, 2001
Seal of the Court


Deputy

Keystone Rehabilitation Systems

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

*

Vs.

*

No. 2001-00234-CD

Robin Walters
Nickolas Suplizio
Defendant(s)

*

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

TO: Dr. Mark W. Maloney/Primary Care Associates of Penfield
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID #: 77069

ATTORNEY FOR: Defendant Nickolas Süplizio

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, August 08, 2001
Seal of the Court



Deputy

Dr. Mark W. Maloney/Primary Care Associates at Penfield

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

*

Vs.

*

No. 2001-00234-CD

Robin Walters
Nickolas Suplizio
Defendant(s)

*

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

TO: Dennis S. Parlavecchio, M.D./Penfield Physicians Office
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, August 08, 2001
Seal of the Court

Dennis S. Parlavecchio, M.D./Penfield Physicians Office

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

Vs.

Robin Walters
Nickolas Suplizio
Defendant(s)

No. 2001-00234-CD

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

TO: Penn Central Physical Therapy
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

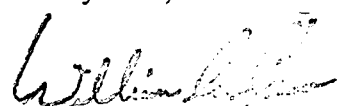
ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, August 09, 2001
Seal of the Court


Deputy

Penn Central Physical Therapy

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

Vs.

Robin Walters
Nickolas Suplizio
Defendant(s)

No. 2001-00234-CD

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

TO: Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical
Associates (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached
McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire
ADDRESS: 811 University Drive
State College, PA 16801
TELEPHONE: 814-238-4926
SUPREME COURT ID # 77069
ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, August 08, 2001
Seal of the Court

Deputy

Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associates

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Amanda Sherwood
Plaintiff(s)

Vs.

Robin Walters
Nickolas Suplizio
Defendant(s)

No. 2001-00234-CD

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

TO: University Health Services
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:
see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire
ADDRESS: 811 University Drive
State College, PA 16801
TELEPHONE: 814-238-4926
SUPREME COURT ID # 77069
ATTORNEY FOR: Defendant Nickolas Suplizio

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, August 08, 2001
Seal of the Court


Deputy

University Health Services

DOCUMENTS TO BE PRODUCED

Any and all medical records for as far back as you retain same on Amanda Sherwood (DOB: September 6, 1980), including but not limited to, history/physical examinations, discharge summaries, progress notes, consultations, operative reports, pathology reports, emergency room records, x-ray reports, CT scan reports, MRI reports, laboratory test results, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, medication records, prognosis, anticipated further care, any and all correspondence, regardless of source, pertaining to patient's medical status, etc.

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Dubois Regional Medical Center in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

m/1147/nock
William A. Shaw
Notary Public



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to HealthSouth/Nittany Valley Rehabilitation Hospital in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801


Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001
m/1:47/noz
William A. Shaw
Prothonotary


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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Keystone Rehabilitation Systems in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

mll:47/noc
William A. Shaw
Prothonotary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

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No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

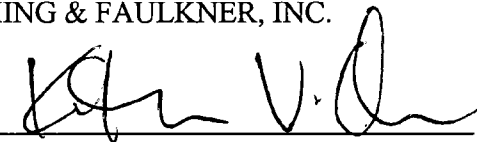
I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Dr. Mark W. Maloney/Primary Care Associates at Penfield in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: _____



Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

11:47 AM
William A. Shaw
Prothonotary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Dennis S. Parlavecchio, M.D./Penfield Physicians Office in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

mll/17/noc
William A. Shaw
Notary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

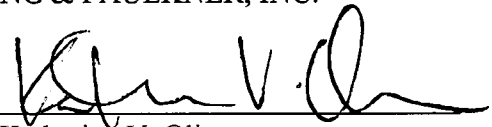
I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Penn Central Physical Therapy in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: _____


Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

m/l:47/ncc
William A. Shaw
Prothonotary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

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No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

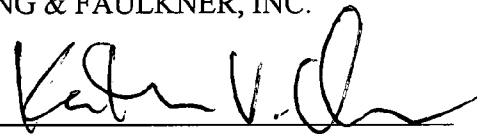
I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associates in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: _____



Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001
m/11:47 ncc
William A. Shaw
Notary Public
KPB

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to University Health Services in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 30th day of August, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

AUG 31 2001

m/11:47/1000

SW
ary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

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No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

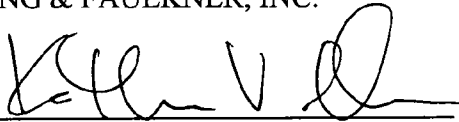
I hereby certify that a true and correct copy of the Notice of Rescheduled Deposition
Directed to Robin Walters in the above-captioned matter was mailed by regular mail, postage
prepaid, at the Post Office, State College, Pennsylvania, on this 23rd day of October, 2001, to the
attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15044-5500

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

By: _____



Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

OCT 24 2001

m/a:07/10m noc
William A. Shaw
Notary Public



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

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No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

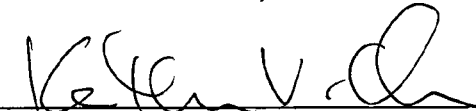
I hereby certify that a true and correct copy of the Notice of Rescheduled Deposition
Directed to Amanda Sherwood in the above-captioned matter was mailed by regular mail,
postage prepaid, at the Post Office, State College, Pennsylvania, on this 23rd day of October,
2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 1504-5500

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

By: _____



Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

OCT 24 2001

mbj 10/24/01
William A. Shaw
Prothonotary
E
KEL

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL TRIAL LISTING

CERTIFICATE OF READINESS

TO THE PROTHONOTARY

DATE PRESENTED

CASE NUMBER 01-234-C.D.
Date Complaint (x) Jury () Non-Jury
Filed: 3/19/01 () Arbitration 2 days/hours

PLAINTIFF(S)

AMANDA SHERWOOD ()

DEFENDANT(S)

ROBIN WALTERS and

NICKOLAS SUPLIZIO ()

ADDITIONAL DEFENDANT(S)

()

Check block if a Minor
is a Party to the Case

FILED

DEC 14 2001

10/21/01 cc atty

William A. Shaw
Prothonotary

copy to CIA

JURY DEMAND FILED BY:

DATE JURY DEMAND FILED:

Plaintiff

March 19, 2001

AMOUNT AT ISSUE CONSOLIDATION DATE CONSOLIDATION ORDERED

More than
& \$20,000.00 () yes (X) no N/A

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.

I certify that all discovery in the case has been completed; all necessary parties and witnesses are available; serious settlement negotiations have been conducted; the case is ready in all respects for trial, and a copy of this Certificate has been served upon all counsel of record and upon all parties of record who are not represented by counsel:


David J. Hopkins, Esq.

FOR THE PLAINTIFF

TELEPHONE NUMBER

David J. Hopkins, Esquire

(814) 375-0300

FOR THE DEFENDANT

TELEPHONE NUMBER

Dennis J. Stofko, Esquire

(814) 262-0615

Katherin Oliver, Esquire

(814) 238-4926

FOR ADDITIONAL DEFENDANT

TELEPHONE NUMBER

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Rescheduled Deposition Directed to Robin Walters in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 19th day of December, 2001, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 1504-5500

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

By: _____

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

DEC 20 2001

m/138/1000
William A. Shaw
Prothonotary

WAS

FILED

JAN 14 2002

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
William A. Shaw
Prothonotary

AMANDA SHERWOOD,
Plaintiff

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,
Defendants

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*

NO. 2001-234-C.D.

ORDER

NOW, this 10th day of January, 2002, following Pre-Trial Conference with counsel for the parties as set forth above and the Court, it is the ORDER of this Court as follows:

1. Jury Selection will be held on January 24, 2002 commencing at 9:00 a.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

2. Jury Trial is hereby scheduled on Wednesday, March 27, 2002 and Thursday, March 28, 2002 commencing at 9:00 a.m. in Courtroom No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

3. The parties hereby agree to the authenticity of any and all medical records and bills which were previously provided through the discovery process. No party shall be required to produce a medical record's witness for purposes of authentication.

4. Any party making objections relative the testimony to be provided by any witness in the form of a

deposition at the time of Trial shall submit said objections to the Court, in writing, no later than thirty (30) days prior to the commencement of Trial. All objections shall reference specific page and line numbers within the deposition(s) in question along with that party's brief relative same. The opposing party shall submit its brief in opposition to said objections no later than fifteen (15) days prior to the commencement of Trial.

5. Any party filing any Motion or Petition regarding limitation or exclusion of evidence or testimony to be presented at time of trial, including but not limited to Motions in Limine, shall file the same no more than thirty (30) days prior to the trial date. The party's Petition or Motion shall be accompanied by an appropriate brief. The responding party thereto shall file its Answer and submit appropriate response brief no later than fifteen (15) days prior to trial.

By the Court,

A handwritten signature in cursive script, reading "Fredric J. Ammerman", written over a horizontal line.

JUDGE FREDRIC J. AMMERMAN

FILED

012:54:51
JAN 14 2002

William A. Shaw,
Prothonotary

2 cc Atty Hopkins
1 cc Atty Stofko
1 cc Atty Horne

✓

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

:
:
:
:
:
:
:
:
:
:

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.22 in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 12th day of February, 2002, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
Dubois, PA 15801

Dennis J. Stofko, Esquire
PO Box 5500
Johnstown, PA 15904-5500

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



By: _____

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

FEB 13 2002

William A. Shaw
Prothonotary

FILED

M/11:33 AM
FEB 13 2002

NO
CC
(KRB)

William A. Shaw
Prothonotary

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

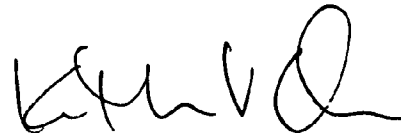
No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE PREREQUISITE TO SERVICE
OF A SUBPOENA PURSUANT TO RULE 4009.22

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

- (1) a Notice of Intent to Serve the Subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party agreed to waive the 20 day waiting period,
- (2) a copy of the Notice of Intent, including the proposed subpoena, is attached to this Certificate;
- (3) no objection to the subpoena has been received; and,
- (4) the subpoena which will be served is identical to the subpoena which is attached to the Notice of Intent to Serve the Subpoena.



Katherine V. Oliver
Attorney for Defendant
NICKOLAS SUPLIZIO

Dated: February 13, 2002

FILED

FEB 14 2002

William A. Shaw
Prothonotary



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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to Nationwide Insurance in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 13th day of February, 2002, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
DuBois, PA 15801

Dennis J. Stofko, Esquire
969 Eisenhower Boulevard
PO BO 5500
Johnstown, PA 15904-5500

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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

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

AMANDA SHERWOOD,

Plaintiff,

vs.

ROBIN WALTERS and
NICKOLAS SUPLIZIO,

Defendants.

No: 01 - 234 - C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Oral Depositions in the
above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State
College, Pennsylvania, on this 12th day of February, 2002, to the attorney(s) of record:

David J. Hopkins, Esquire
902 Beaver Drive
DuBois, PA 15801

Dennis J. Stofko, Esquire
969 Eisenhower Boulevard
PO Box 5500
Johnstown, PA 15904-5500


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

By: 

Katherine V. Oliver
Attorneys for Defendant
NICKOLAS SUPLIZIO
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

FEB 19 2002

m/205/rocc
William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

No. 01-234 CD

ROBIN WALTERS and
NICHOLAS SUPLIZIO,

Defendants

DEFENDANT WALTERS'
SUPPLEMENTAL PRETRIAL
STATEMENT

Counsel of record for this party:

Dennis J. Stofko, Esquire

P.O. Box 5500

Johnstown, Pa. 15904

814 262-0064

ID 27638

FILED

MAR 06 2002

William A. Shaw
Prothonotary

Michael-Gerard Moncman, D.O., M.Sc.
Neurosurgeon • Board Certified

Central Pennsylvania Neurosurgical
Associates L.L.C.

February 13, 2002

Dennis Stofko, Esquire
969 Eisenhower Boulevard
Suite E
PO Box 5500
Johnstown, PA 15904

RE: AMANDA SHERWOOD
DATE OF IME: FEBRUARY 7, 2002

Dear Mr. Stofko:

At your request I performed an Independent Medical Evaluation on Amanda Sherwood.

I reviewed records that were provided. I have reports of diagnostic studies. I told Ms. Sherwood that no care would be provided, no follow up would be arranged, and that no physician-patient relationship would exist between us based on this contact.

All of my opinions were expressed with reasonable medical certainty.

Amanda Sherwood is a 21-year-old right-handed female who was the restrained front seat passenger in a vehicle on February 27, 1999 that was making a left turn when it was struck by another vehicle. The vehicle in which Ms. Sherwood was riding was struck on the driver's side front fender/quarter panel. Ms. Sherwood tells me that she was "jolted from side to side" at the time of the impact. She describes having left hand pain at the scene. She tells me that she experienced numbness in both legs as well as mid and upper back pain along with neck and shoulder pain beginning February 28, 1999. The patient tells me that she has been told that this is "muscle spasms" and "inflammation" and she has been treated conservatively. She has seen Dr. Martin Schaffer and he prescribed a back brace. She describes getting some relief with the back brace as well as with the use of Soma and Ibuprofen.

This woman's pain is occipito-cervical to the bra line in distribution. She states that holding her hands up in the air makes them numb. She does home exercises and was last seen or treated by a physician over her Christmas break. She is a student. Her family physician is an osteopath and apparently provided OMT for her. Finally, she sometimes complains of pain with deep inspiration.

1701 12th Avenue, Suite F

Allisona, PA 16601

814-944-7810

Fax 814-944-5327

cpnatid@aol.com

PAGE 2

RE: AMANDA SHERWOOD

There is no history of pain prior to the road traffic accident.

DIAGNOSTIC STUDIES:

X-rays of the cervical spine, thoracic spine, right humerus, and left hand are all reportedly normal.

I am enclosing copies entitled IME Health History, Work History, and Pain Drawing. These were completed by Mr. Sherwood.

Ms. Sherwood did not take any medications on the day of the examination.

PHYSICAL EXAMINATION:

This young lady is 5 feet 3 inches tall and weighs 145 pounds. Vital signs are stable. Blood pressure is 104/78. She is awake and alert. Higher cognitive functions are intact. Memory and cognition are intact. She has no cranial neuropathies. Motor and sensory examinations are full. Cerebellar functions are normally performed. Station and gait are normal. Reflexes are equal and symmetric. Spinal curves are physiologic. Cervical ranges of motion are full in all planes. She complains of pain at the endpoints with lateral rotation and side bending. Lumbar ranges of motion are full. She has symmetrical excursion with respiration. Segmental palpation reveals consistent pain to palpation through the right infraspinatus muscle and posteriorly in the right shoulder. Adson's maneuver is provocative bilaterally within about 10 seconds. She can walk on her heels and toes. She does not respond to tests for symptom magnification.

IMPRESSIONS:

1. Posttraumatic right upper dorsal and right shoulder girdle pain; this is a strain injury.
2. Clinically, bilateral thoracic outlet syndrome. The relationship of this diagnosis to involvement in a road traffic accident on February 27, 1999 is unclear.

Circumstantially, the patient had no admitted complaints prior to the road traffic accident.

Please contact me if you have any questions or comments.

Sincerely,



Michael-G. Moncman, DO, MSc, FACOS
MGM/lis

Enclosures: IME Health History, Work History, Pain Drawing
D 02/07/02 T 02/13/02

Michael-Gerard Moncman, DO, MSc
Neurosurgeon • Board Certified

Central Pennsylvania Neurosurgical
Associates LTD

March 1, 2002

Dennis J. Stofko, Esquire
969 Eisenhower Boulevard
Suite E - PO Box 5500
Johnstown, PA 15904

RE: AMANDA SHERWOOD

Dear Mr. Stofko:

Thank you for bringing the records regarding Amanda Sherwood's treatment with Mark W. Maloney, DO to my attention.

The history as recorded in my IME report is a history that she provided to me. In fact, you will note that she denies ever having pain prior to the road traffic accident in her IME Health History.

In reviewing Dr. Maloney's notes, it is apparent that this lady had mid and low back pain as a consequence of a 1999 motor vehicle accident. The road traffic accident in 2000 caused her to complain of right-sided superior trapezius pain and spasm.

Accepting the accuracy of Dr. Maloney's July 12, 2000 record, I believe with reasonable medical certainty that this lady's right-sided complaints are due to a road traffic accident that occurred on July 7, 2000 and cannot reasonably be attributed to the February 27, 1999 road traffic accident.

In reviewing my records I do not have any objective medical evidence supporting complaints of numbness in this woman's legs. Relative to pain in the upper shoulder and neck, she reports pain to palpation in the right shoulder girdle and she tests positively for thoracic outlet syndrome. The right shoulder girdle pain cannot reasonably be ascribed to the February 1999 road traffic accident. I do not have scientific evidence to suggest that that road traffic accident caused her to develop thoracic outlet syndrome.

Contact me if you have any questions or comments.

Sincerely,



Michael-G. Moncman, DO, MSc, FACOS
MGM/ls
D 02/26/02 T 03/01/02

1701 12th Avenue, Suite F
Allentown, PA 16601
814-944-7810
Fax 814-944-5327
cpnald@aol.com

FILED

NO
EC

MAR 12:59 PM
MAR 06 2002

William A. Shaw
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

AMANDA SHERWOOD,

Plaintiff

vs.

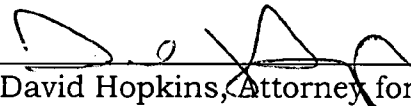
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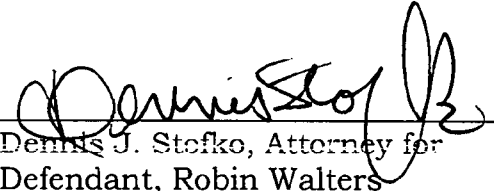
ROBIN WALTERS and
NICHOLAS SUPLIZIO,

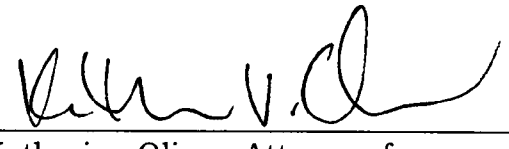
Defendants

PRAECIPE

Please mark the above captioned matter ended, settled and forever
discontinued.


David Hopkins, Attorney for Plaintiff


Dennis J. Stefko, Attorney for
Defendant, Robin Walters


Katherine Oliver, Attorney for
Defendant, Nicholas Suplizio

FILED

MAR 27 2002

William A. Shaw
Prothonotary

FILED

No
cc

~~MD~~
MAR 27 2002

~~MD~~ Certificate to

My 570510

copy to CIA

~~MD~~
William A. Shaw
Prothonotary

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

CIVIL DIVISION

COPY

Amanda Sherwood

Vs.

No. 2001-00234-CD

Robin Walters

Nickolas Suplizio

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 March 27, 2002 marked:

Ended, Settled and Forever Discontinued

Record costs in the sum of \$188.66 have been paid in full by David J. Hopkins, Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 27th day of March A.D. 2002.

William A. Shaw, Prothonotary