

01-263-CD

BRENDA L. GRENIER et ux -vs- GRAY INVESTMENT CO., INC. t/a/b/a
BEST WESTERN INN & CONFERENCE CENTER

Date: 07/27/2005

Clearfield County Court of Common Pleas

User: LBENDER

Time: 09:58 AM

ROA Report

Page 1 of 5

Case: 2001-00263-CD

Current Judge: Fredric Joseph Ammerman

Brenda L. Grenier, Edmund A. Grenier Jr. vs. Gray Investment Co., Inc., Best Western Inn & Conference Center, Hallstrom Construction, Inc.

Civil Other

Date		Judge
02/23/2001	✓ Filing: Praeipe for Writ of Summons Paid by: Cherry, Toni M (attorney for Grenier, Brenda L.) Receipt number: 1818835 Dated: 02/23/2001 Amount: \$80.00 (Check) Please enter our appearance on behalf of Plaintiffs, and issue a Writ of Summons in the above-captioned action against Defendants. (see file for original) s/Toni M. Cherry, Esq. Two Writs issued to Sheriff	No Judge
03/02/2001	✓ Sheriff Return, Papers served on Defendant(s). So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm	No Judge
04/04/2001	✓ Praeipe for Entry of Appearance, on behalf of the Defendant. s/Tracey G. Benson, Esq. Cert of Svc no cc	No Judge
04/10/2001	✓ Praeipe for Rule upon Plaintiff to file Complaint, filed by Atty. Benson Rule to Atty. Benson	No Judge
04/17/2001	✓ Affidavit of Service, Rule to File Complaint upon Plaintiffs counsel of record. s/Tracey G. Benson, Esq. Certificate of Service 1 cc to atty	No Judge
05/17/2001	✓ Complaint. filed by s/Toni M. Cherry, Esq. 1 cc atty Cherry	No Judge
06/25/2001	✓ Answer and New Matter. Filed by s/Tracey G. Benson, Esq. Verification. s/Bridgett Harriger Cert of Svc. Filed. no cc	No Judge
07/03/2001	✓ Third Party Complaint. filed by s/Tracey G. Benson, Esq. Verification, s/Bridgett Harriger Cert of Svc 1 cc Sheriff Service	No Judge
07/13/2001	✓ Sheriff Return, Papers served on Defendant(s). So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm	No Judge
07/24/2001	✓ Praeipe for Appearance, on behalf of Additional Defendant, HALLSTROM CONSTRUCTION, INC., in regard to the above entitled matter. s/Troy J. Harper, Esq. Cert of Svc no cc	No Judge
11/15/2001	✓ Certificate of Service, First Set of Interrogatories Directed to the Plaintiffs upon Toni M. Cherry, Esq. and Tracey G. Benson, Esq. Filed by s/Troy J. Harper, Esq. no cc	No Judge
12/05/2001	✓ Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d) Filed by s/Troy J. Harper, Esquire Verification s/Victoria A. Doksa Cert of Svc no cc	No Judge
	✓ Notice of Service of Interrogatories upon Toni M. Cherry, Esq. Filed by s/Tracey G. Benson, Esq. Cert of Svc 1 cc to Atty	No Judge
12/14/2001	✓ Reply to New Matter, filed by s/Tracey G. Benson No CC	No Judge
03/07/2002	✓ Motion to Compel, filed on behalf of Additional Defendant, Hallstrom Construction, Inc. By Troy J. Harper, Esquire no cc	No Judge
03/08/2002	✓ ORDER, AND NOW, March 8, 2002, re: Plaintiffs to file and serve full and complete answers to the Additional Defendant's First Set of Request for Production of Documents within 20 days of the date of service of this Order, if not the Court will impose appropriate sanctions. by the Court, s/JKR,JR.,P.J. 2 cc Atty Dennison	John K. Reilly Jr.
03/18/2002	✓ Certificate of Service, Order of Court dated March 8, 2002 entered in response to the Motion to Compel was served upon Toni M. Cherry, Esq. and Tracey G. Benson, Esq., filed by s/Troy J. Harper No CC	John K. Reilly Jr.

Brenda L. Grenier, Edmund A. Grenier Jr. vs. Gray Investment Co., Inc., Best Western Inn & Conference Center, Hallstrom Construction, Inc.

Civil Other

Date		Judge
06/07/2002	✓ Certificate of Service, Response to First Set of Request for Production of Documents Directed to Plaintiffs upon Troy J. Harper, Esq. and Tracey G. Benson, Esq. Filed by s/Toni M. Cherry, Esq. 1 cc Atty Cherry	John K. Reilly Jr.
08/13/2002	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21 upon Dr. Mark Piasio. s/Troy J. Harper, Esq. no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21 upon Records Custodian, Crum & Forster Insurance s/Troy J. Harper, Esq. Cert. of Svc.	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 upon Records Custodian, Keystone Rehabilitation Systems. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant fo Pa. R.C.P. 4009.21. upon Records Custodian, Outpatient Physical Therapy Dept., DuBois Regional Medical Center. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, upon Records Custodian, West Penn Orthopaedics. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21, upon Records Custodian, Primary Care Associates. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21, upon Dr. Garrett W. Dixon. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21, upon Records Custodian, DuBois Regional Medical Center. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21, upon Records Custodian, Centre Community Hospital. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, upon Records Custodian, DuBois Magnetic Imaging Center. s/Troy J. Harper, Esq. Cert of Svc no cc	John K. Reilly Jr.
08/19/2002	✓ Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa. R.C.P. 4009.21 filed by s/Troy J. Harper, Esq. no cc	John K. Reilly Jr.
10/04/2002	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, Primary Care Assoc., filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, Centre Community Hospital, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Dr. Mark Piasio, filed by s/Troy Harper No CC	Fredric Joseph Ammerman

Brenda L. Grenier, Edmund A. Grenier Jr. vs. Gray Investment Co., Inc., Best Western Inn & Conference Center, Hallstrom Construction, Inc.

Civil Other

Date		Judge
10/04/2002	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Dr. Garrett W. Dixon, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: DuBois Regional Medical Center, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, DuBois Magnetic Imaging Center, filed. No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, University Orthopaedics Center, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian Crum & Forster Insurance, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, Keystone Rehabilitation Systems, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, West Penn Orthopaedics, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, Re: Records Custodian, Outpatient Physical Therapy Dept., filed by Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, University Orthopaedics Center, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, Crum & Forster Insurance, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, Keystone Rehabilitation Systems, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, Outpatient Physical Therapy Dept., filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, West Penn Orthopaedics, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, Primary Care Associates, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Dr. Mark Piasio, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Dr. Garrett W. Dixon, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, DuBois Regional Medical Center, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman

Brenda L. Grenier, Edmund A. Grenier Jr. vs. Gray Investment Co., Inc., Best Western Inn & Conference Center, Hallstrom Construction, Inc.

Civil Other

Date		Judge
10/04/2002	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, Centre Community Hospital, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
	✓ Notice of Deposition for the Purpose of Copying Records Only, Re: Records Custodian, DuBois Magnetic Imaging Center, filed by s/Troy J. Harper No CC	Fredric Joseph Ammerman
10/23/2002	✓ Motion To Compel. filed by s/Julia R. Cronin, Esq. Certificate of Service no cc	John K. Reilly Jr.
10/31/2002	✓ RULE TO SHOW CAUSE, AND NOW, this 31st day of October, 2002, issued upon Plaintiffs. Rule returnable 25th day of November, 2002, at 10:30 a.m. by the Court, s/JKR, JR., P.J. 1 cc Atty Cronin	John K. Reilly Jr.
11/12/2002	✓ Affidavit of Service, Rule to Show Cause pertaining to Defendant's Motion to Compel against Plaintiffs upon Plaintiff and Additional Defendant. s/Julia R. Cronin, Esq. Certificate of Service, Affidavit of Service upon Toni M. Cherry, Esq. and Troy J. Harper, Esq. s/Julia R. Cronin, Esquire no cc	John K. Reilly Jr.
11/25/2002	✓ ORDER, NOW THIS 25th day of November, 2002, re: Motion To Compel. by the Court, s/JKR, JR., P.J. 1 cc to Atty.	John K. Reilly Jr.
12/17/2002	✓ Certificate of Service, Plaintiffs' Answers to Defendant's First Set of Interrogatories upon: JULIA R. CRONIN, ESQ. and TROY J. HARPER, ESQ. filed by s/Toni M. Cherry, Esq. no cc	John K. Reilly Jr.
05/14/2003	✓ Notice of Deposition of Plaintiff, Brenda L. Grenier, filed by Atty. Harper No Cert. Copies	John K. Reilly Jr.
	✓ Notice of Deposition of Plaintiff, Edmund A. Grenier, Jr., filed by Atty. Harper No Cert. Copies.	John K. Reilly Jr.
05/27/2003	✓ Notice of Intent To Serve A Subpoena To Produce Documents And Things For Discovery Pursuant To PA. R.C.P. 4009.21 Upon: DR. WILLIAM AYOUB. s/Troy J. Harper, Esquire Certificate of Service no cc	John K. Reilly Jr.
	✓ Notice of Intent To Serve A Subpoena To Produce Documents and Things For Discovery Pursuant to PA. R.C.P. 4009.21 Upon: DR. LAUN HALLSTROM. filed by s/Troy J. Harper, Esquire Certificate of Service no cc	John K. Reilly Jr.
05/28/2003	✓ Certificate of Service of Answers to First Set of Interrogatories Directed to Plaintiffs. No cc.	John K. Reilly Jr.
06/23/2003	✓ Certificate Prerequisite to Service of a Subpoena Upon: DR. LAUN HALLSTROM Pursuant to Pa.R.C.P. 4009.22. Filed by s/Troy J. Harper, Esquire no cc	John K. Reilly Jr.
	✓ Certificate Prerequisite to Service of a Subpoena Upon: DR. WILLIAM AYOUB Pursuant to Pa. R.C.P. 4009.22. Filed by s/Troy J. Harper, Esquire no cc	John K. Reilly Jr.
	✓ Notice of Deposition for the Purpose of Copying Records Only Upon: DR. LAUN HALLSTROM. filed by s/Troy J. Harper, Esquire Certificate of Service no cc	John K. Reilly Jr.
	✓ Notice of Deposition for the Purpose of Copying Records Only Upon: DR. WILLIAM AYOUB. filed by s/Troy J. Harper, Esquire Certificate of Service no cc	John K. Reilly Jr.

Date: 07/27/2005

Clearfield County Court of Common Pleas

User: LBENDER

Time: 09:58 AM

ROA Report

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Case: 2001-00263-CD

Current Judge: Fredric Joseph Ammerman

Brenda L. Grenier, Edmund A. Grenier Jr. vs. Gray Investment Co., Inc., Best Western Inn & Conference Center, Hallstrom Construction, Inc.

Civil Other

Date		Judge
06/24/2003	✓ Notice of Deposition of BRENDA L. GRENIER upon: Brenda L. Grenier, c/o Toni M. Cherry, Esq. filed by s/Troy J. Harper, Esq. Certificate of Service no cc	John K. Reilly Jr.
	✓ Notice of Deposition of EDMUND A. GRENIER, JR. upon Edmund A. Grenier, Jr. c/o Toni M. Cherry, Esq. filed by s/Troy J. Harper, Esq. no cc	John K. Reilly Jr.
09/19/2003	✓ Notice of Deposition of Plaintiff, Brenda L. Grenier filed by Atty. Harper. No cc.	John K. Reilly Jr.
	✓ Notice of Deposition of Plaintiff, Edmund A. Grenier, Jr. filed by Atty. Harper. No cc.	John K. Reilly Jr.
08/19/2004	✓ Notice of Deposition of Plaintiff, Brenda L. Grenier, filed by s/ Troy J. Harper, No cc	John K. Reilly Jr.
	✓ Notice of Deposition of Plaintiff, Edmund A. Grenier, Jr., filed by s/Troy J. Harper, no cc	John K. Reilly Jr.
09/17/2004	✓ Notice of Deposition of Plaintiff, Brenda L. Grenier, filed on behalf of additional defendant, Hallstrom Construction, Inc. by s/Troy J. Harper, Esq. No CC. Certificate of Service, upon Toni M. Cherry, Esq. and Julia R. Cronin, Esq.	John K. Reilly Jr.
	✓ Notice of Deposition of Plaintiff, Edmund A. Grenier, Jr., filed on behalf of additional defendant, Hallstrom Construction, Inc. by s/Troy J. Harper, Esq. No CC. Certificate of Service, upon Toni M. Cherry, Esq. and Julia R. Cronin, Esq.	John K. Reilly Jr.
10/13/2004	✓ Notice of Deposition of Plaintiff, Brenda L. Grenier, filed on behalf of Additional Defendant, Hallstrom Construction, Inc. Filed by s/ Troy J. Harper, Esquire. Certificate of Service, by 1st class mail to Toni M. Cherry, Esquire, and Julia R. Cronin, Esquire. No CC	John K. Reilly Jr.
	✓ Notice of Deposition of Plaintiff, Edmund A. Grenier, Jr., Filed on behalf of: Additional Defendant, Hallstrom Construction, Inc. by s/Troy J. Harper, Esquire. Certificate of Service, on 12th day of October, 2004, by 1st class mail to Toni M. Cherry, Esquire, and Julia R. Cronin, Esquire. No CC	John K. Reilly Jr.
06/20/2005	✓ Motion To Compel, filed by s/Julia R. Cronin, Esquire. 1CC Atty Cronin	John K. Reilly Jr.
06/21/2005	✓ Rule To Show Cause, NOW, this 21st day of June, 2005, upon consideration of Defendants' Motion to Compel, rule returnable for argument on the 22nd day of July, 2005 at 10:00 a.m. in Courtroom 1. /s/Fredric J. Ammerman, Pres. Judge. 1CC Atty Cronin	Fredric Joseph Ammerman
06/27/2005	✓ Affidavit of Service filed. Rule to Show Cause dated June 21, 2005 pertaining to Defendant's Motion to Compel upon the plaintiff on June 24, 2005 and upon Additional Defendant on June 24, 2005. No CC.	Fredric Joseph Ammerman
07/22/2005	Order, NOW, this 22nd day of July, 2005, upon consideration of the Motion to Compel filed by Defendant Gray Investment, Co., Inc. t/d/b/a Best Western Inn and Conference Center, Ordered that: (see original). By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 4CC Atty. T. Cherry (will serve).	Fredric Joseph Ammerman

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :

vs. :

No. 01 - 263 C.D.

GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

PRAECIPE FOR WRIT OF SUMMONS

TO WILLIAM A. SHAW, PROTHONOTARY

Sir:

Please enter our appearance on behalf of Plaintiffs, BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband, and issue a Writ of Summons in the above-captioned action against Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, whose address is 82 North Park Place, DuBois, Pennsylvania 15801.

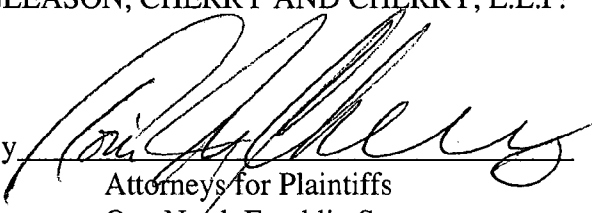
FILED

FEB 23 2001

William A. Shaw
Prothonotary

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By 

Attorneys for Plaintiffs
One North Franklin Street
P. O. Box 505
DuBois, PA 15801
Supreme Court No.: 30205

Date: February 22, 2001

FILED

FEB 23 2001

William A. Shaw
Prothonotary

Cherry
PA \$80.00
Quits to Shaw

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION**

COPY

SUMMONS

**Brenda L. Grenier and
Edmund A. Grenier , Jr., husband and wife**

Vs.

NO.: 2001-00263-CD

**Gray Investment Co., Inc.
Best Western Inn & Conference Center**

TO: GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE CENTER

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 02/23/2001

William A. Shaw
Prothonotary

Issuing Attorney:

Toni M Cherry
P. O. Box 505
DuBois, PA 15801

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10734

GRENIER, BRENDA L. & EDMUND A. JR.

01-263-CD

VS.

GRAY INVESTMENT CO. INC. T/d/b/a BEST WESTERN INN & CONFERENC

SUMMONS

SHERIFF RETURNS

NOW FEBRUARY 28, 2001 AT 10:45 AM EST SERVED THE WITHIN SUMMONS ON
GRAY INVESTMENT CO. INC. t/d/b/a BEST WESTERN INN & CONFERENCE CENTER
AT EMPLOYMENT, 82 NORTH PARK PLACE, DUBOIS, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO ANN WAYLONIS, MANAGER A TRUE AND
ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN TO HER THE
CONTENTS THEREOF.
SERVED BY: COUDRIET

Return Costs

Cost	Description
28.22	SHFF. HAWKINS PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATYY.

Sworn to Before Me This

2nd Day of March 2001
William A. Shaw

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

So Answers,

Chester A. Hawkins
by Marilyn Harris
Chester A. Hawkins
Sheriff

FILED

MAR 02 2001
01:54pm
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION

COPY

SUMMONS

Brenda L. Grenier and
Edmund A. Grenier, Jr., husband and wife

Vs.

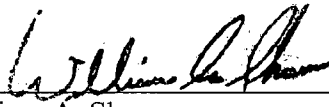
NO.: 2001-00263-CD

Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

TO: GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE CENTER

To the above named Defendant(s) you are hereby notified that the above named
Plaintiff(s) has/have commenced a Civil Action against you.

Date: 02/23/2001



William A. Shaw
Prothonotary

Issuing Attorney:

Toni M Cherry
P. O. Box 505
DuBois, PA 15801

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE;

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

01-263-00

PRAECIPE FOR ENTRY OF APPEARANCE

To: William Shaw, Prothonotary
Clearfield County, Court of Common Pleas

Kindly enter my appearance on behalf of defendant, Gray Investment Co., Inc.
t/d/b/a Best Western Inn & Conference Center in the above-captioned action. All papers
may be served on the undersigned for purposes of this action.

FILED

APR 04 2001

William A. Shaw
Prothonotary

Tracey G. Benson
Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-5474

Counsel for Defendant
Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

Dated: April 3, 2001

7

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **PRAECIPE FOR ENTRY OF APPEARANCE**, was hereby served by depositing the same within the custody of the United States Postal Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:

Tracey G. Benson
Tracey G/Benson

Dated: April 3, 2001

FILED

APR 04 2001

MISS/DOC
William A. Shaw
Prothonotary



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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO. 2001-263-CD

PRAECIPE FOR RULE UPON PLAINTIFF TO FILE A COMPLAINT

To: William Shaw, Prothonotary
Clearfield County, Court of Common Pleas

Please enter a Rule Upon Plaintiff To File A Complaint in the above-captioned
action within twenty (20) days after service of the Rule.


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-5474

Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: April 9, 2001

FILED

APR 10 2001

William A. Shaw
Prothonotary

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

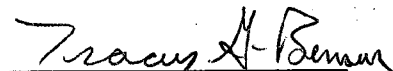
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **PRAECIPE FOR RULE UPON PLAINTIFF TO FILE COMPLAINT**, was hereby served by depositing the same within the custody of the United States Postal Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:


Tracey G. Benson

Dated: April 9, 2001

FILED

APR 10 2001

W/1100/WR
William A. Shaw
Prothonotary

(CANT TO ATT)

W/ RULR

ETA

FILED

APR 10 2001

William A. Shaw
Prothonotary

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

Brenda L. Grenier
Edmund A. Grenier Jr.

Vs.
Gray Investment Co., Inc.
Best Western Inn & Conference Center

Case No. #2001-00263-CD

RULE TO FILE COMPLAINT

TO: BRENDA L. GRENIER and EDMUND A. GRENIER, JR., H & W

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: April 10, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

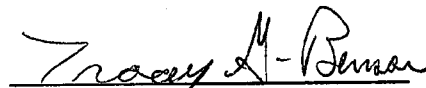
GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

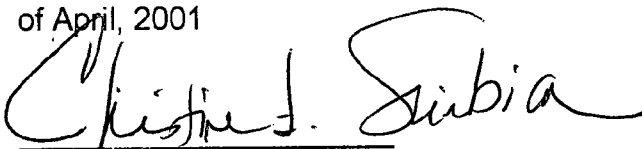
CIVIL ACTION NO. 2001-00263-CD

AFFIDAVIT OF SERVICE

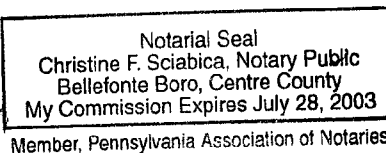
I, Tracey G. Benson, Esquire, counsel for Gray Investment Co., Inc. t/d/b/a Best
Wester Inn & Conference Center , hereby certify that service of the Rule to File Complaint
was made upon the plaintiffs by serving their counsel of record, by depositing the same
in the United States mail, certified mail, return receipt requested, mailed on April 11, 2001.
A copy of the return receipt showing receipt of said rule on April 13, 2001, is attached
hereto as Exhibit A.


Tracey G. Benson

Sworn to and subscribed
before me this 16th day
of April, 2001



Notary Public



FILED

APR 17 2001

William A. Shaw
Prothonotary

EXHIBIT A

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:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Toni M. Cherry

APR 13 2001

C. Signature

x Toni M. Cherry

☐ Agent☒ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ 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)

7099 3400 0001 8106 7823

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO. 2001-263-CD

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **AFFIDAVIT OF SERVICE**, was hereby
served by depositing the same within the custody of the United States Postal Service, First
Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By: Tracey G. Benson
Tracey G. Benson

Dated: April 16, 2001

FILED

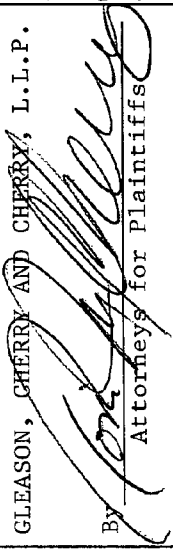
APR 17 2001

m/12:45/ny
William A. Shaw
Prothonotary



(CEN to Atty

[Handwritten signature]

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA	
CIVIL DIVISION	
BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband, Plaintiffs	
vs.	
GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, Defendants	
<u>C O M P L A I N T</u>	
To The Within Defendants:	
YOU ARE HEREBY NOTIFIED TO PLEAD TO THE WITHIN COMPLAINT WITHIN THIRTY (30) DAYS FROM THE DATE OF SERVICE HEREOF.	
GLEASON, CHERRY AND CHERRY, L.L.P. By  Attorneys for Plaintiffs	
LAW OFFICES GLEASON, CHERRY & CHERRY, L.L.P. P. O. Box 505 Du Bois, PENNSYLVANIA 15801-0505 ONE NORTH FRANKLIN STREET	

FILED

MAY 17 2001
M/10:41 cc atty
William A. Shaw
Prothonotary
Cherry

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

BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband,	:	No. 01 - 263 C.D.
Plaintiffs	:	Type of Case: TRESPASS
vs.	:	Type of Pleading: COMPLAINT
GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER,	:	Filed on Behalf of: BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband
Defendants	:	Counsel of Record for these Parties:
	:	TONI M. CHERRY, ESQ.
	:	Supreme Court No.: 30205
	:	GLEASON, CHERRY AND CHERRY, L.L.P.
	:	Attorneys at Law
	:	P.O. Box 505
	:	One North Franklin Street
	:	DuBois, PA 15801
	:	(814) 371-5800

FILED

MAY 17 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :
vs. : No. 01 - 263 C.D.
GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

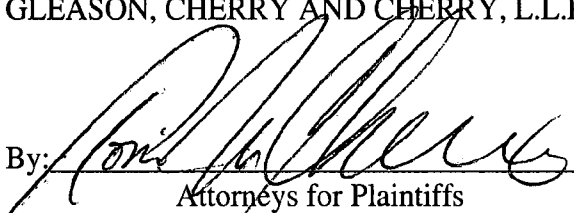
NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Notice and Complaint 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 claims 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, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator
Office of the Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 (Ext. 88-89)

GLEASON, CHERRY AND CHERRY, L.L.P.

By: 

Attorneys for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :
vs. : No. 01 - 263 C.D.
GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

COMPLAINT

AND NOW, come BRENDA L. GRENIER and EDMUND A. GRENIER, JR., by and through their Attorneys, GLEASON, CHERRY AND CHERRY, L.L.P., and bring this action against Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, to recover damages upon causes of action whereof the following are statements:

COUNT I - BRENDA L. GRENIER, Wife Plaintiff vs. Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER

1. Plaintiffs, BRENDA L. GRENIER and EDMUND A. GRENIER JR., are adult individuals and are wife and husband, and reside with each other at R. R. #4, Box 603, Sandy Township, DuBois, Clearfield County, Pennsylvania 15801.

2. The Defendant, GRAY INVESTMENT CO., INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and trading and doing business as BEST WESTERN INN & CONFERENCE CENTER, located at 82 North Park Place, DuBois, Clearfield County, Pennsylvania 15801.

3. That at all times mentioned herein, the Defendant did operate its conference center by letting said building and its rooms out to the public for the purposes of having parties and other functions therein.

4. At all material times, the conference center and, in particular, the enclosed entranceway or lobby thereof was under the sole and exclusive control, management and maintenance of the Defendant, its agents, servants, workmen, or employees, then and there engaged in Defendant's business and acting within the course and scope of their employment or authority.

5. On or about February 28, 1999, at approximately 4:45 p.m., Plaintiff was an invitee of the Defendant at Defendant's business premises and as she entered the conference center, there existed an accumulation of water upon the grates in the foyer or entryway which caused Plaintiff to slip, stumble and fall, resulting in serious and permanent injuries as set forth below.

6. At the above time and place, Defendant, by its agents, servants, workmen, or employees, acting in the scope of their authority, was negligent in:

(a) causing or permitting water to accumulate upon the grates in the entryway where it posed an unreasonable risk of injury to Plaintiff and other business visitors;

(b) failing to make a reasonable inspection of the grated floor which would have revealed the existence of the dangerous condition posed by the accumulation of water;

(c) failing to give warning of the dangerous condition posed by the accumulation of water, erect barricades, or take any other safety precautions to prevent injury to the Plaintiff and other business visitors;

(d) failing to remove the accumulated water from the grate and flooring and to keep the grate and flooring clear of water;

(e) failing to have the grating installed across the floor in a manner that would have provided more traction when the grating and flooring were wet;

(f) failing to use reasonable prudence in the care and maintenance of the grating and flooring in the entryway of the premises; and

(g) failing to have rubber or other absorbent material over the metal strips of the grating.

7. Solely as a result of Defendant's negligence, Plaintiff sustained serious and painful injuries to her body and extremities, including trauma to both knees; twisting of her left leg and ankle; trauma to her hips; multiple bruises and contusions; a severe shock to the nerves and nervous system and possible other injuries, some or all of which may be permanent in nature and may have aggravated pre-existing conditions, causing her great pain and suffering.

8. By reason of said above-described injuries, Plaintiff, BRENDA L. GRENIER, was rendered sick, sore, lame and prostrate and disordered for which she was required to receive treatment and for which she may continue to receive treatment for some time in the future.

9. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered and will continue to suffer physical anguish and pain and suffering and inconvenience in the future.

10. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered shock to the nerves and nervous system and has suffered mental anguish and emotional distress and may continue to so suffer for an indefinite time in the future.

11. As a result of said injuries, the Plaintiff, BRENDA L. GRENIER, has been and will be deprived in the future of the ordinary pleasures of life.

12. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered and will continue to suffer an impairment of earning capacity and an inability to lead a normal social life.

13. As a result of said accident and negligence of Defendant, the said Plaintiff, BRENDA L. GRENIER, has suffered serious injuries which may be permanent in nature.

WHEREFORE, Plaintiff, BRENDA L. GRENIER, claims damages against Defendant, GRAY INVESTMENT CO., INC. t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

COUNT II - EDMUND A. GRENIER, JR., Husband Plaintiff vs. GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER

14. The Plaintiff, EDMUND A. GRENIER, JR., avers that he is the husband of BRENDA L. GRENIER, Wife Plaintiff.

15. Plaintiff, EDMUND A. GRENIER, JR., incorporates by reference herein the allegations contained in Paragraphs 1 through 13 inclusive of COUNT I of this Complaint as fully as though the same were set forth at length herein.

16. As a result of the negligence of Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, as hereinbefore alleged, EDMUND A. GRENIER, JR., as husband of the said BRENDA L. GRENIER, has been and may and probably will in the future be, obliged to expend large and various sums of money for

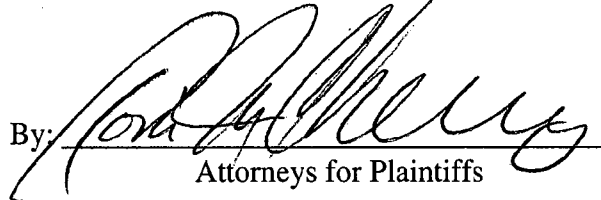
medicine and medical attention in and about endeavoring to treat and cure his said wife of her injuries.

17. By reason of the aforesaid, he has been, and may and probably will in the future be, deprived of the assistance and society of his said wife, all of which has been and probably will be to his great financial damage and loss.

WHEREFORE, Plaintiff, EDMUND A. GRENIER, JR., claims damages against the Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By: 
Attorneys for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

Personally appeared before me, a Notary Public in and for the County and State
aforesaid, BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband, who, being
duly sworn according to law, depose and say that the facts set forth in the foregoing Complaint
are true and correct to the best of their knowledge, information and belief.

Brenda L. Grenier

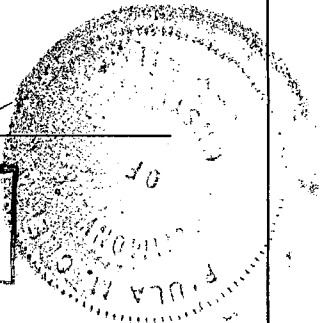
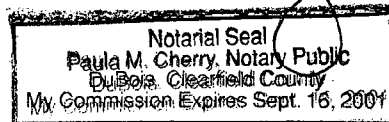
Brenda L. Grenier

Edmund A. Grenier, Jr.

Edmund A. Grenier, Jr.

Sworn to and subscribed before me this 16th day of May, 2001.

Paula M. Cherry



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :

vs.

: No. 01 - 263 C.D.
:

GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

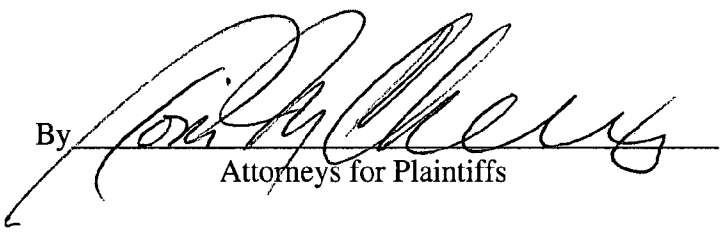
CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2001, a true and correct copy of the Complaint filed on behalf of Plaintiffs in the above-captioned action was served upon counsel for Defendants, TRACEY G. BENSON, ESQ., by mailing the same to him by United States First Class Mail, postage prepaid, by depositing the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

TRACEY G. BENSON, ESQ.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823-1695

GLEASON, CHERRY AND CHERRY, L.L.P.

By


Attorneys for Plaintiffs

Dated: May 16, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

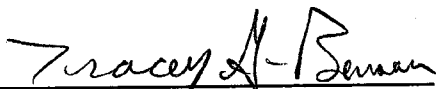
Defendant.

CIVIL ACTION NO.

NOTICE TO PLEAD

TO THE WITHIN NAMED PLAINTIFFS:

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


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

FILED

JUN 25 2001

William A. Shaw
Prothonotary

Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: June 22, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.
01-263 C.D.

ANSWER AND NEW MATTER

Defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center, ("Best Western"), by its counsel Tracey G. Benson, Esquire, and Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., hereby responds to the complaint of plaintiffs Brenda L. Grenier and Edmund A. Grenier, Jr., her husband, as follows:

COUNT I

**BRENDA L. GRENIER, WIFE PLAINTIFF V.
DEFENDANTS, GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN & CONFERENCE CENTER**

1. The defendant is without knowledge or information sufficient to form a belief as to the truth of any allegations contained in paragraph 1 of the Complaint, said allegations are deemed to be denied, and proof thereof is demanded.

2. The defendant admits the allegations contained in paragraph 2 of the Complaint.

3. The defendant admits that on or about February 28, 1999, it operated the

Best Western Motor Inn & Conference Center located at 82 North Park Place, DuBois, Pennsylvania which operations included the rental of rooms for appropriate purposes and/or functions. The defendant denies any remaining allegations contained in paragraph 3 of the Complaint.

4. The defendant admits that the structure occupied by the Best Western Inn & Conference Center includes an enclosed entrance way leading from the outside into the lobby. The defendant further admits that the building premises and real estate were, on February 28, 1999, owned and maintained by Gray Investment Co., Inc., either through its employees, contractors, or others. The defendant denies any remaining allegations contained in paragraph 4 of the Complaint.

5. The defendant denies each and every allegation contained in paragraph 5 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

6. The defendant denies each and every allegation contained in paragraph 6, including subparagraphs (a) through (g), of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

7. The defendant denies each and every allegation contained in paragraph 7 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

8. The defendant denies each and every allegation contained in paragraph 8 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

9. The defendant denies each and every allegation contained in paragraph 9 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

10. The defendant denies each and every allegation contained in paragraph

10 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

11. The defendant denies each and every allegation contained in paragraph 11 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

12. The defendant denies each and every allegation contained in paragraph 12 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

13. The defendant denies each and every allegation contained in paragraph 13 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

WHEREFORE, defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center prays that Count I of the Complaint be dismissed and that judgment be entered in favor of the defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center and against plaintiff Brenda L. Grenier on all claims asserted in Court I of the Complaint.

COUNT II

EDMUND A. GRENIER, JR., HUSBAND PLAINTIFF V. GRAY INVESTMENT CO., INC. T/D/B/A BEST WESTERN INN & CONFERENCE CENTER

14. The defendant is without knowledge or information sufficient to form a belief as to the truth of any allegations contained in paragraph 1 of the Complaint, said allegations are deemed to be denied, and proof thereof is demanded.

15. Defendant incorporates by reference herein its responses to paragraphs 1 through and including 14 of the Complaint as set forth in full.

16. The defendant denies each and every allegation contained in paragraph

16 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

17. The defendant denies each and every allegation contained in paragraph 17 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

WHEREFORE, defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center prays that Count II of the Complaint be dismissed and that judgment be entered in favor of the defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center and against plaintiff Edmund A. Grenier, Jr., on all claims asserted in Court II of the Complaint.

NEW MATTER

18. Defendant Best Western avers that plaintiffs' claims are subject to, and limited by, the provisions of the Pennsylvania Comparative Negligence Act.

19. Defendant Best Western avers that plaintiffs' claims are barred by the contributory negligence of wife-plaintiff.

20. Defendant Best Western avers that plaintiffs' claims are barred by the doctrine of assumption of the risk.

21. Defendant Best Western avers that plaintiffs' injuries and/or damages as alleged in the Complaint, were directly and proximately caused, in whole or in part, by the negligent conduct of wife-plaintiff, as follows:

- a. In failing to walk in a careful and prudent manner;
- b. In failing to perceive any condition which wife-plaintiff alleges in her Complaint was dangerous and/or hazardous with regard to any

property controlled or occupied by this defendant;

c. In failing to safeguard herself against the risk of injuries or harm caused by any alleged dangerous or hazardous condition in premises occupied or controlled by this defendant;

d. In failing to exercise that degree of caution and care that would be expected from a reasonably prudent person under the conditions then and there prevailing;

e. In failing to maintain a proper lookout for any accumulation of water upon the grates in the foyer or entrance way that plaintiffs' allege constituted a hazard to safe travel with regard to any property controlled or occupied by this defendant;

f. In failing to walk around any accumulation of water upon the grates in the foyer or entrance way where the accident is alleged to have occurred, which was, or should have been, known to, or obvious to, wife-plaintiff ;

g. In electing to walk over, through, or in close proximity to, any alleged hazard, dangerous or defective condition caused by accumulations of water existing on property controlled or occupied by this defendant which plaintiffs knew or should have known was present; and

h. In failing to take an alternate path around any obstruction, defective or hazardous condition caused by accumulations of water alleged to be present upon the grates in the foyer or entrance way on

property owned or controlled by the defendant which plaintiffs allege caused their injuries. tiff alleges caused his injuries.

22. In the event that it is determined plaintiffs sustained any harm or injuries as a result of any alleged defective or dangerous condition on premises occupied or controlled by this defendant, which is specifically denied, then defendant Best Western avers that any such condition was, or should have been, known to plaintiffs or obvious to any reasonably prudent person walking in the area and maintaining a proper lookout.

23. Defendant Best Western avers that plaintiffs have not sustained any injuries or damages as alleged in the Complaint, due to any conduct, errors, or omissions on the part of this defendant.

24. Defendant Best Western avers that in the event it is judicially determined that Best Western was negligent, which is specifically denied, then it is averred that plaintiffs did not sustain some or all of the injuries or harm as a direct, proximate, or legal result of any such negligent conduct on the part of this defendant.

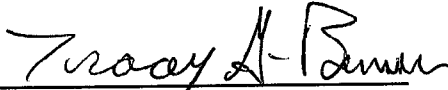
25. Defendant Best Western avers that to the extent plaintiffs sustained any injuries or harm as alleged in the Complaint, which is denied, then said injuries or harm were directly, proximately, and/or solely caused by the negligence of others over whom defendant Best Western had neither the opportunity nor duty of control.

26. Defendant Best Western avers that plaintiffs' Complaint fails to state any claim upon which relief can be granted as against this defendant.

27. Defendant Best Western avers that plaintiffs have not sustained some or all of the injuries or harm as alleged in the Complaint.

28. Defendant Best Western avers that plaintiffs' claims are barred, in whole or in part, by any applicable statute of limitations.

WHEREFORE, defendant Gray Investment Co, Inc., t/d/b/a Best Western Inn & Conference Center, prays that judgment be entered in its favor, and against plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., her husband, on all claims asserted in the Complaint.


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-5474

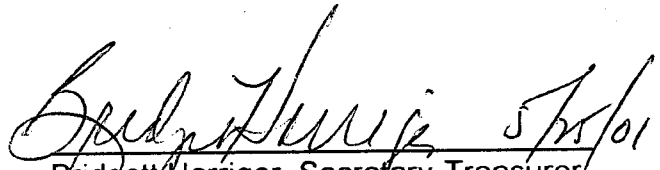
Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: June 22, 2001

VERIFICATION

I, Bridgett Harriger, Secretary-Treasurer, Gray Investment Co., Inc., t/d/b/a Best Western Motor Inn & Conference Center,, state that the facts contained in the foregoing **ANSWER AND NEW MATTER** are true and correct to the best of my knowledge, information and belief.

I make this Verification pursuant to 18 Pa.C.S.A., Section 4904 pertaining to unsworn falsification to authorities.


Bridgett Harriger, Secretary-Treasurer
Gray Investment Co., Inc., t/d/b/a
Best Western Motor Inn & Conference
Center

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

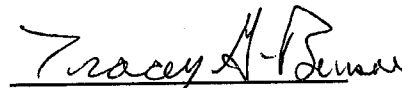
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **ANSWER AND NEW MATTER**, was
hereby served by depositing the same within the custody of the United States Postal
Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:


Tracey G. Benson

Dated: June 22, 2001

FILED

JUN 25 2001

M 11:25 NOCC

William A. Shaw
Prothonotary

WAS

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.
2001-00263-CD

FILED

JUL 03 2001

William A. Shaw
Prothonotary

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT
HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE
SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.**

Court Administrator's Office
Clearfield County Courthouse
230 E. Main Street
Clearfield, PA 16830
Telephone No. 814-765-2641, Ext. 5982

**MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.**

By: Tracey G. Benson
Tracey G. Benson

Dated: July 2, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.
2001-00263-CD

THIRD PARTY COMPLAINT

Defendant, Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center ("Best Western"), by its counsel, Tracey G. Benson, Esquire, and Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., makes this Third-Party Complaint against additional defendant Hallstrom Construction, Inc. ("Hallstrom"), and states as follows in support thereof:

1. The additional defendant Hallstrom Construction, Inc. is a Pennsylvania corporation with its principle place of business at 368 Kiwanis Trail, DuBois, Clearfield County, Pennsylvania 15801.

2. Additional defendant Hallstrom Construction is in the business of providing general contracting and construction services.

3. Pursuant to a contract dated October 7, 1993, additional defendant Hallstrom Construction entered into a construction contraction with Penn Haned Corporation for the performance of certain construction work in connection with the Penn Rose Expansion Project ("The Project"). The Project included construction of a building to house the conference center facilities of the Best Western Inn located in DuBois, Pennsylvania.

4. Subsequent to construction, Penn Handed Corporation was merged into Gray Investment Company, Inc., the corporate entity which currently owns and operates the Best Western Inn & Conference Center.

5. On or about February 23, 2001, the instant litigation was commenced by plaintiffs Brenda L. Grenier and Edmund A. Grenier, Jr., her husband, pursuant to a Writ of Summons filed in the Court of Common Pleas of Clearfield County, Pennsylvania.

6. On or about May 16, 2001, plaintiffs filed their Complaint, a copy of which is attached hereto as Exhibit A.

7. On or about June 22, 2001, defendant Gray Investment filed its Answer and New Matter, a copy of which is attached hereto as Exhibit B.

8. In their Complaint, plaintiffs allege that Brenda L. Grenier sustained personal injuries when she slipped and fell on February 28, 1999, while walking upon a grating located in the foyer or entrance way of the Conference Center. In paragraph 6 of their Complaint, plaintiffs allege that the accident was caused by a dangerous

condition on the land, specifically the manner in which the entryway grating was installed and/or maintained.

9. As part of its work in connection with construction of the Conference Center, additional defendant Hallstrom Construction was responsible for specifying, purchasing and installing any grating located at the entranceway of the Conference Center as identified in plaintiffs' Complaint.

10. In the event that it is determined that plaintiffs sustained any injuries or damages as a result of any dangerous condition existing at, on or about the entryway of the Conference Center as alleged in plaintiffs' Complaint, which is specifically denied, then defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, avers that any injuries or resulting damages sustained by plaintiffs in the February 28, 1999 accident were directly and proximately caused by negligence of additional defendant Hallstrom Construction, Inc. by specifying, furnishing, and installing an entranceway, and any associated grating, in a manner that was dangerous and/or defective as alleged by plaintiffs.

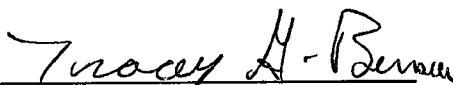
11. In the event that it is judicially determined that plaintiffs sustained any harm, injuries or damages as a result of any conduct on the part of defendant Gray Investment Co., Inc., which is specifically denied, then this defendant avers that such conduct and/or any dangerous conditions were caused by the negligent conduct, actions and omissions of additional defendant Hallstrom Construction, Inc.

12. In the event that it is judicially determined that plaintiffs are entitled to any recovery against defendant Gray Investment Co., Inc., as alleged in the Complaint,

which is specifically denied, then defendant Gray Investment Co., Inc. avers that additional defendant Hallstrom Construction, Inc. is directly liable to plaintiff for any and all injuries for which they may be entitled to recover.

13. In the event that it is judicially determined that plaintiffs are entitled to recovery for any damages as alleged in the Complaint, which is specifically denied, then defendant Gray Investment Co., Inc. avers that additional defendant Hallstrom Construction, Inc. is jointly and severally liable to plaintiffs for all such injuries or damages, thus entitling defendant Gray Investment Co., Inc. to contribution, common law indemnity and/or contractual indemnity from the additional defendant.

WHEREFORE, defendant Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center join defendant Hallstrom Construction, Inc. as an additional defendant in this litigation, and prays for judgment in its favor and against the additional defendant in connection with claims asserted against this defendant by plaintiffs in their Complaint.


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-5474

Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: July 2, 2001

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. : No. 01 - 263 C.D.

GRENIER, JR., her husband, :

Plaintiffs :

: Type of Case: TRESPASS

:

vs. :

: Type of Pleading: COMPLAINT

:

GRAY INVESTMENT CO., INC., t/d/b/a :

: Filed on Behalf of: BRENDA L. GRENIER

BEST WESTERN INN & CONFERENCE :

: and EDMUND A. GRENIER, JR., her

CENTER, :

: husband

Defendants :

: Counsel of Record for these Parties:

:

: TONI M. CHERRY, ESQ.

: Supreme Court No.: 30205

:

: GLEASON, CHERRY AND

: CHERRY, L.L.P.

: Attorneys at Law

: P.O. Box 505

: One North Franklin Street

: DuBois, PA 15801

:

: (814) 371-5800

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband :

Plaintiffs :

vs. : No. 01 - 263 C.D.

GRAY INVESTMENT CO., INC.. t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :

Defendants :

NOTICE

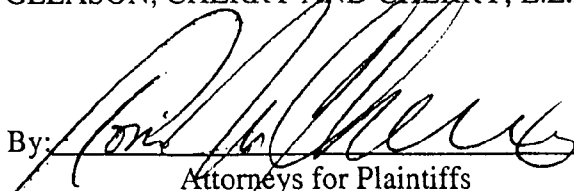
You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Notice and Complaint are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses 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 claims 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, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator
Office of the Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 (Ext. 88-89)

GLEASON, CHERRY AND CHERRY, L.L.P.

By:


Attorneys for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :
vs. : No. 01 - 263 C.D.
GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

COMPLAINT

AND NOW, come BRENDA L. GRENIER and EDMUND A. GRENIER, JR., by and through their Attorneys, GLEASON, CHERRY AND CHERRY, L.L.P., and bring this action against Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, to recover damages upon causes of action whereof the following are statements:

COUNT I - BRENDA L. GRENIER, Wife Plaintiff vs. Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER

1. Plaintiffs, BRENDA L. GRENIER and EDMUND A. GRENIER JR., are adult individuals and are wife and husband, and reside with each other at R. R. #4, Box 603, Sandy Township, DuBois, Clearfield County, Pennsylvania 15801.

2. The Defendant, GRAY INVESTMENT CO., INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and trading and doing business as BEST WESTERN INN & CONFERENCE CENTER, located at 82 North Park Place, DuBois, Clearfield County, Pennsylvania 15801.

3. That at all times mentioned herein, the Defendant did operate its conference center by letting said building and its rooms out to the public for the purposes of having parties and other functions therein.

4. At all material times, the conference center and, in particular, the enclosed entranceway or lobby thereof was under the sole and exclusive control, management and maintenance of the Defendant, its agents, servants, workmen, or employees, then and there engaged in Defendant's business and acting within the course and scope of their employment or authority.

5. On or about February 28, 1999, at approximately 4:45 p.m., Plaintiff was an invitee of the Defendant at Defendant's business premises and as she entered the conference center, there existed an accumulation of water upon the grates in the foyer or entryway which caused Plaintiff to slip, stumble and fall, resulting in serious and permanent injuries as set forth below.

6. At the above time and place, Defendant, by its agents, servants, workmen, or employees, acting in the scope of their authority, was negligent in:

(a) causing or permitting water to accumulate upon the grates in the entryway where it posed an unreasonable risk of injury to Plaintiff and other business visitors;

(b) failing to make a reasonable inspection of the grated floor which would have revealed the existence of the dangerous condition posed by the accumulation of water;

(c) failing to give warning of the dangerous condition posed by the accumulation of water, erect barricades, or take any other safety precautions to prevent injury to the Plaintiff and other business visitors;

(d) failing to remove the accumulated water from the grate and flooring and to keep the grate and flooring clear of water;

(e) failing to have the grating installed across the floor in a manner that would have provided more traction when the grating and flooring were wet;

(f) failing to use reasonable prudence in the care and maintenance of the grating and flooring in the entryway of the premises; and

(g) failing to have rubber or other absorbent material over the metal strips of the grating.

7. Solely as a result of Defendant's negligence, Plaintiff sustained serious and painful injuries to her body and extremities, including trauma to both knees; twisting of her left leg and ankle; trauma to her hips; multiple bruises and contusions; a severe shock to the nerves and nervous system and possible other injuries, some or all of which may be permanent in nature and may have aggravated pre-existing conditions, causing her great pain and suffering.

8. By reason of said above-described injuries, Plaintiff, BRENDA L. GRENIER, was rendered sick, sore, lame and prostrate and disordered for which she was required to receive treatment and for which she may continue to receive treatment for some time in the future.

9. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered and will continue to suffer physical anguish and pain and suffering and inconvenience in the future.

10. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered shock to the nerves and nervous system and has suffered mental anguish and emotional distress and may continue to so suffer for an indefinite time in the future.

11. As a result of said injuries, the Plaintiff, BRENDA L. GRENIER, has been and will be deprived in the future of the ordinary pleasures of life.

12. As a result of said injuries, Plaintiff, BRENDA L. GRENIER, has suffered and will continue to suffer an impairment of earning capacity and an inability to lead a normal social life.

13. As a result of said accident and negligence of Defendant, the said Plaintiff, BRENDA L. GRENIER, has suffered serious injuries which may be permanent in nature.

WHEREFORE, Plaintiff, BRENDA L. GRENIER, claims damages against Defendant, GRAY INVESTMENT CO., INC. t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

COUNT II - EDMUND A. GRENIER, JR., Husband Plaintiff vs. GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER

14. The Plaintiff, EDMUND A. GRENIER, JR., avers that he is the husband of BRENDA L. GRENIER, Wife Plaintiff.

15. Plaintiff, EDMUND A. GRENIER, JR., incorporates by reference herein the allegations contained in Paragraphs 1 through 13 inclusive of COUNT I of this Complaint as fully as though the same were set forth at length herein.

16. As a result of the negligence of Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, as hereinbefore alleged, EDMUND A. GRENIER, JR., as husband of the said BRENDA L. GRENIER, has been and may and probably will in the future be, obliged to expend large and various sums of money for

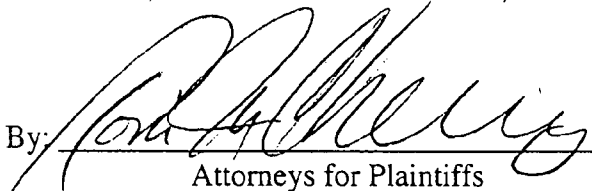
medicine and medical attention in and about endeavoring to treat and cure his said wife of her injuries.

17. By reason of the aforesaid, he has been, and may and probably will in the future be, deprived of the assistance and society of his said wife, all of which has been and probably will be to his great financial damage and loss.

WHEREFORE, Plaintiff, EDMUND A. GRENIER, JR., claims damages against the Defendants, GRAY INVESTMENT CO., INC., t/d/b/a BEST WESTERN INN & CONFERENCE CENTER, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By: 

Attorneys for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA

:
: SS.

COUNTY OF CLEARFIELD

:

Personally appeared before me, a Notary Public in and for the County and State
aforesaid, BRENDA L. GRENIER and EDMUND A. GRENIER, JR., her husband, who, being
duly sworn according to law, depose and say that the facts set forth in the foregoing Complaint
are true and correct to the best of their knowledge, information and belief.

Brenda L. Grenier

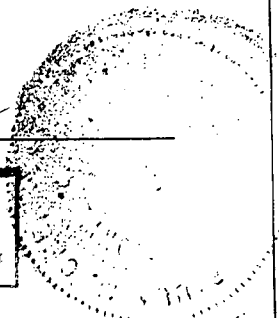
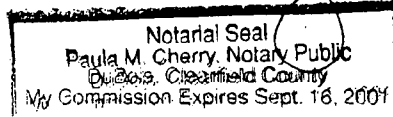
Brenda L. Grenier

Edmund A. Grenier, Jr.

Edmund A. Grenier, Jr.

Sworn to and subscribed before me this 16th day of May, 2001.

Paula M. Cherry



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

BRENDA L. GRENIER and EDMUND A. :
GRENIER, JR., her husband, :
Plaintiffs :

vs. : No. 01 - 263 C.D.

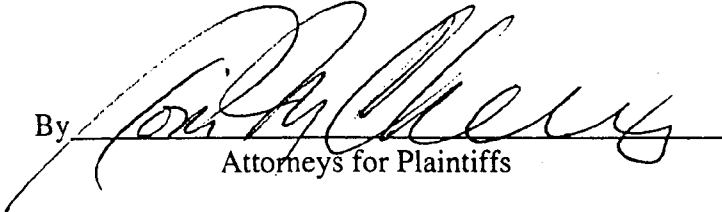
GRAY INVESTMENT CO., INC., t/d/b/a :
BEST WESTERN INN & CONFERENCE :
CENTER, :
Defendants :

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2001, a true and correct copy of the Complaint filed on behalf of Plaintiffs in the above-captioned action was served upon counsel for Defendants, TRACEY G. BENSON, ESQ., by mailing the same to him by United States First Class Mail, postage prepaid, by depositing the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

TRACEY G. BENSON, ESQ.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823-1695

GLEASON, CHERRY AND CHERRY, L.L.P.

By 

Attorneys for Plaintiffs

Dated: May 16, 2001

EXHIBIT B

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

v.

Defendant.

CIVIL ACTION NO.

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

FILED

JUN 25 2001

William A Shaw
Prothonotary

Tracey G. Benson
Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: June 22, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.
01-263 C.D.

ANSWER AND NEW MATTER

Defendant Gray Investment Co, Inc t/d/b a Best Western Inn & Conference Center, ("Best Western"). by its counsel Tracey G. Benson, Esquire, and Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., hereby responds to the complaint of plaintiffs Brenda L. Grenier and Edmund A. Grenier, Jr., her husband, as follows:

COUNT I

**BRENDA L. GRENIER, WIFE PLAINTIFF V.
DEFENDANTS, GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN & CONFERENCE CENTER**

1. The defendant is without knowledge or information sufficient to form a belief as to the truth of any allegations contained in paragraph 1 of the Complaint, said allegations are deemed to be denied, and proof thereof is demanded.
2. The defendant admits the allegations contained in paragraph 2 of the Complaint.
3. The defendant admits that on or about February 28, 1999, it operated the

Best Western Motor Inn & Conference Center located at 82 North Park Place, DuBois, Pennsylvania which operations included the rental of rooms for appropriate purposes and/or functions. The defendant denies any remaining allegations contained in paragraph 3 of the Complaint.

4. The defendant admits that the structure occupied by the Best Western Inn & Conference Center includes an enclosed entrance way leading from the outside into the lobby. The defendant further admits that the building premises and real estate were, on February 28, 1999, owned and maintained by Gray Investment Co., Inc., either through its employees, contractors, or others. The defendant denies any remaining allegations contained in paragraph 4 of the Complaint.

5. The defendant denies each and every allegation contained in paragraph 5 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

6. The defendant denies each and every allegation contained in paragraph 6, including subparagraphs (a) through (g), of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

7. The defendant denies each and every allegation contained in paragraph 7 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

8. The defendant denies each and every allegation contained in paragraph 8 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

9. The defendant denies each and every allegation contained in paragraph 9 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

10. The defendant denies each and every allegation contained in paragraph

10 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

11. The defendant denies each and every allegation contained in paragraph 11 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

12. The defendant denies each and every allegation contained in paragraph 12 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

13. The defendant denies each and every allegation contained in paragraph 13 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

WHEREFORE, defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center prays that Count I of the Complaint be dismissed and that judgment be entered in favor of the defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center and against plaintiff Brenda L. Grenier on all claims asserted in Court I of the Complaint.

COUNT II

**EDMUND A. GRENIER, JR., HUSBAND PLAINTIFF V. GRAY
INVESTMENT CO., INC. T/D/B/A BEST WESTERN
INN & CONFERENCE CENTER**

14. The defendant is without knowledge or information sufficient to form a belief as to the truth of any allegations contained in paragraph 1 of the Complaint, said allegations are deemed to be denied, and proof thereof is demanded.

15. Defendant incorporates by reference herein its responses to paragraphs 1 through and including 14 of the Complaint as set forth in full.

16. The defendant denies each and every allegation contained in paragraph

16 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

17. The defendant denies each and every allegation contained in paragraph 17 of the Complaint pursuant to Pa.R.Civ.P. 1029(e).

WHEREFORE, defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center prays that Count II of the Complaint be dismissed and that judgment be entered in favor of the defendant Gray Investment Co, Inc. t/d/b/a Best Western Inn & Conference Center and against plaintiff Edmund A. Grenier, Jr., on all claims asserted in Court II of the Complaint.

NEW MATTER

18. Defendant Best Western avers that plaintiffs' claims are subject to, and limited by, the provisions of the Pennsylvania Comparative Negligence Act.

19. Defendant Best Western avers that plaintiffs' claims are barred by the contributory negligence of wife-plaintiff.

20. Defendant Best Western avers that plaintiffs' claims are barred by the doctrine of assumption of the risk.

21. Defendant Best Western avers that plaintiffs' injuries and/or damages as alleged in the Complaint, were directly and proximately caused, in whole or in part, by the negligent conduct of wife-plaintiff, as follows:

- a. In failing to walk in a careful and prudent manner;
- b. In failing to perceive any condition which wife-plaintiff alleges in her Complaint was dangerous and/or hazardous with regard to any

property controlled or occupied by this defendant;

c. In failing to safeguard herself against the risk of injuries or harm caused by any alleged dangerous or hazardous condition in premises occupied or controlled by this defendant;

d. In failing to exercise that degree of caution and care that would be expected from a reasonably prudent person under the conditions then and there prevailing;

e. In failing to maintain a proper lookout for any accumulation of water upon the grates in the foyer or entrance way that plaintiffs' allege constituted a hazard to safe travel with regard to any property controlled or occupied by this defendant;

f. In failing to walk around any accumulation of water upon the grates in the foyer or entrance way where the accident is alleged to have occurred, which was, or should have been, known to, or obvious to, wife-plaintiff ;

g. In electing to walk over, through, or in close proximity to, any alleged hazard, dangerous or defective condition caused by accumulations of water existing on property controlled or occupied by this defendant which plaintiffs knew or should have known was present; and

h. In failing to take an alternate path around any obstruction, defective or hazardous condition caused by accumulations of water alleged to be present upon the grates in the foyer or entrance way on

property owned or controlled by the defendant which plaintiffs allege caused their injuries. tiff alleges caused his injuries.

22. In the event that it is determined plaintiffs sustained any harm or injuries as a result of any alleged defective or dangerous condition on premises occupied or controlled by this defendant, which is specifically denied, then defendant Best Western avers that any such condition was, or should have been, known to plaintiffs or obvious to any reasonably prudent person walking in the area and maintaining a proper lookout.

23. Defendant Best Western avers that plaintiffs have not sustained any injuries or damages as alleged in the Complaint, due to any conduct, errors, or omissions on the part of this defendant.

24. Defendant Best Western avers that in the event it is judicially determined that Best Western was negligent, which is specifically denied, then it is averred that plaintiffs did not sustain some or all of the injuries or harm as a direct, proximate, or legal result of any such negligent conduct on the part of this defendant.

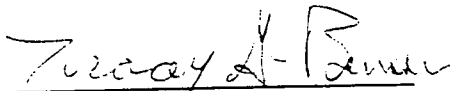
25. Defendant Best Western avers that to the extent plaintiffs sustained any injuries or harm as alleged in the Complaint, which is denied, then said injuries or harm were directly, proximately, and/or solely caused by the negligence of others over whom defendant Best Western had neither the opportunity nor duty of control.

26. Defendant Best Western avers that plaintiffs' Complaint fails to state any claim upon which relief can be granted as against this defendant.

27. Defendant Best Western avers that plaintiffs have not sustained some or all of the injuries or harm as alleged in the Complaint.

28. Defendant Best Western avers that plaintiffs' claims are barred, in whole or in part, by any applicable statute of limitations.

WHEREFORE, defendant Gray Investment Co, Inc., t/d/b/a Best Western Inn & Conference Center, prays that judgment be entered in its favor, and against plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., her husband, on all claims asserted in the Complaint.


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
Telephone No. (814) 355-5474

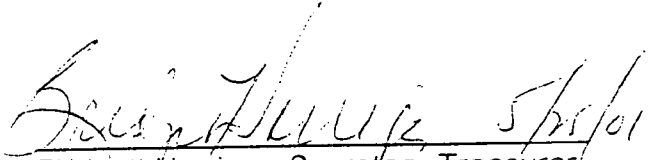
Counsel for Defendant Gray
Investment Co., Inc. t/d/b/a Best
Western Inn & Conference Center

Dated: June 22, 2001

VERIFICATION

I, Bridgett Harriger, Secretary-Treasurer, Gray Investment Co., Inc., t/d/b/a Best Western Motor Inn & Conference Center,, state that the facts contained in the foregoing **ANSWER AND NEW MATTER** are true and correct to the best of my knowledge, information and belief.

I make this Verification pursuant to 18 Pa.C.S.A., Section 4904 pertaining to unsworn falsification to authorities.


Bridgett Harriger, Secretary-Treasurer
Gray Investment Co., Inc., t/d/b/a
Best Western Motor Inn & Conference
Center

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **ANSWER AND NEW MATTER**, was
hereby served by depositing the same within the custody of the United States Postal
Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By: Tracey G. Benson
Tracey G. Benson

Dated: June 22, 2001

VERIFICATION

I, **Bridgett Harriger, Secretary-Treasurer, Gray Investment Co., Inc., t/d/b/a**
Best Western Motor Inn & Conference Center, state that the facts contained in the
foregoing **THIRD PARTY COMPLAINT** are true and correct to the best of my
knowledge, information and belief.

I make this Verification pursuant to 18 Pa.C.S.A., Section 4904 pertaining to
unsworn falsification to authorities.


Bridgett Harriger, Secretary-Treasurer
Gray Investment Co., Inc., t/d/b/a
Best Western Motor Inn & Conference
Center

07-01

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

CIVIL ACTION NO.

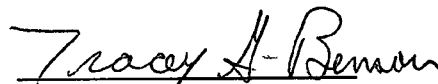
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **THIRD PARTY COMPLAINT**, was
hereby served by depositing the same within the custody of the United States Postal
Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:


Tracey G. Benson

Dated: July 2, 2001

FILED

JUL 03 2001
O 11 18 16
William A. Shaw
Prothonotary

cc Sheryl Seurer
E
~~ext~~

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11192

GRENIER, BRENDA L.

01-263-CD

VS.

GRAY INVESTMENT al

THIRD PARTY COMPLAINT

SHERIFF RETURNS

NOW JULY 6, 2001 AT 10:20 AM DST SERVED THE WITHIN THIRD PARTY COMPLAINT ON HALLSTROM CONSTRUCTION, INC., DEFENDANT AT EMPLOYMENT, 368 KIWANIS TRAIL, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BECK SPANGLER, PIC, A TRUE AND ATTESTED COPY OF THE ORIGINAL THIRD PARTY COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.
SERVED BY: SNYDER

Return Costs

Cost	Description
30.69	SHFF. HAWKINS PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

13th Day Of July 2001


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

So Answers,


Chester A. Hawkins
Sheriff

FILED

01/31/01
JUL 13 2001

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 24 2001

William A. Shaw
Prothonotary

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Appearance was served on the

23rd day of July, 2001, by United States Mail, First Class,

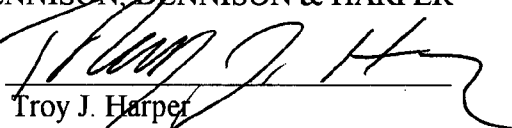
Postage Prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

FILED

JUL 24 2001

01/21/02
William A. Shaw
Prothonotary

[Handwritten signature]

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

NOV 15 2001

William A. Shaw
Prothonotary

VS.

Defendant,

VS.

Additional Defendant.

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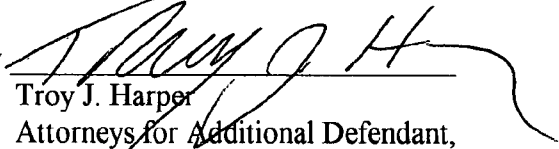
* Number 2001 - 263 C.D.

**Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801**

and one certified copy of the same was served in the same manner addressed to:

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

FILED

NOV 15 2001

M/12:30/11
William A. Shaw
Prothonotary

No 9/C

[Handwritten signature]

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Answer, New Matter
and New Matter Pursuant
to Pa.R.C.P. 2252(d)

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

DEC 05 2001

William A. Shaw
Prothonotary

VS.

Defendant,

VS.

Additional Defendant.

Troy J. Harper
Attorneys for the Additional Defendant

**BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,**

VS.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

VS.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

* Civil Action - Law

* Number 2001 - 263 C.D.

**ANSWER, NEW MATTER AND NEW MATTER
PURSUANT TO P.A.R.C.P. 2252(d)**

AND NOW, comes the Defendant, HALLSTROM CONSTRUCTION, INC., by and through its attorneys, Dennison, Dennison & Harper, who file the following Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d):

1. Admitted.
2. Admitted.
3. Admitted.
4. After reasonable investigation, the Additional Defendant, Hallstrom Construction, Inc., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 4 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn &

Conference Center's, Third Party Complaint, and said averments are therefore denied.

5. With respect to the averments of Paragraph 5 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint, the Writ of Summons and the Record speak for themselves, and no further response is deemed required.

6. With respect to the averments of Paragraph 6 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint, the Plaintiffs' Complaint and the Record speak for themselves, and no further response is deemed required.

7. With respect to the averments of Paragraph 7 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint, the Original Defendant's Answer and New Matter and the Record speak for themselves, and no further response is deemed required.

8. With respect to the averments of Paragraph 8 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint, the Plaintiffs' Complaint speaks for itself, and no further response is deemed required.

9. The averments of Paragraph 9 are denied as stated. On the contrary, the Additional Defendant, Hallstrom Construction, Inc., was responsible for purchasing and installing a mat located in the entranceway of the Conference Center. By way of further response, the Additional Defendant, Hallstrom Construction, Inc., is without sufficient knowledge and information at this

time in order to admit or deny the allegation that it specified the mat located in the entrance way. In particular, it is averred that the mat may have been specified by KTH Architects.

10. The averments of Paragraph 10 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint constitute conclusions of law, and no further response is deemed required. To the extent any further response is deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

11. The averments of Paragraph 11 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint constitute conclusions of law, and no further response is deemed required. To the extent any further response is deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

12. The averments of Paragraph 12 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint constitute conclusions of law, and no further response is deemed required. To the extent any further response is deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

13. The averments of Paragraph 13 of the Original Defendant, Gray Investments Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint constitute conclusions of law, and no further response is deemed required. To the extent any further

response is deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

WHEREFORE, the Additional Defendant, Hallstrom Construction, Inc., demands judgment in its favor and against the Plaintiffs and Original Defendant. **JURY TRIAL DEMANDED.**

**NEW MATTER DIRECTED TO ORIGINAL DEFENDANT, GRAY
INVESTMENT COMPANY, T/D/B/A BEST WESTERN
INN & CONFERENCE CENTER**

14. The Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, claims as set forth in its Third Party Complaint are barred by laches.

15. The Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, claims as set forth in its Third Party Complaint are barred by the applicable statute of limitations.

16. The Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, claims as set forth in its Third Party Complaint are barred by estoppel.

17. The Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, claims as set forth in its Third Party Complaint are barred by Accord and Satisfaction.

18. Any claims by the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, are waived by the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, acceptance of the work completed by the

Additional Defendant, Hallstrom Construction, Inc.

WHEREFORE, the Additional Defendant, Hallstrom Construction, Inc., demands judgment in its favor and against the Plaintiffs and Original Defendant. **JURY TRIAL DEMANDED.**

**NEW MATTER PURSUANT TO PA. R.C.P. 2252(D) DIRECTED
TO ORIGINAL DEFENDANT, GRAY
INVESTMENT COMPANY, T/D/B/A BEST WESTERN
INN & CONFERENCE CENTER**

19. The Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, is solely liable to the Plaintiffs for any alleged damages or injuries suffered by them, and the averments of the Plaintiffs' Complaint directed against Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, are incorporated herein by reference thereto, solely for the purpose of establishing a claim for sole liability.

20. If the Additional Defendant, Hallstrom Construction, Inc., is held liable to the Plaintiffs on any cause of action as set forth in the Plaintiffs' Complaint or the Original Defendant's Third Party Complaint, such liability being expressly denied, then the Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, is liable over to the Additional Defendant, Hallstrom Construction, Inc., for contribution and/or indemnity, and the averments of the Plaintiffs' Complaint directed against the Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, are incorporated herein by reference thereto for the purpose of establishing a claim against the Defendants, Gray Investment Co., Inc., t/d/b/a

Best Western Inn & Conference Center, for indemnity and contribution.

WHEREFORE, the Additional Defendant, Hallstrom Construction, Inc., demands judgment against the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, as being solely liable for the damages claimed by the Plaintiffs, or in the alternative, as being liable over to the Additional Defendant, Hallstrom Construction, Inc., for indemnity and/or contribution. **JURY TRIAL DEMANDED.**

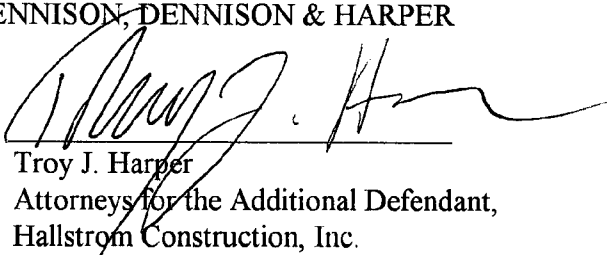
NEW MATTER DIRECTED TO PLAINTIFFS

21. All of the Plaintiffs' claims are barred by the applicable statute of limitations.
22. The Plaintiff has failed to state a cause of action upon which relief may be granted.
23. The alleged injuries and/or damages sustained by the Plaintiffs were caused or contributed to, in whole or in part, by persons or entities other than the Additional Defendant, Hallstrom Construction, Inc., and over whom the Additional Defendant, Hallstrom Construction, Inc., had no control, and for whose actions the Additional Defendant, Hallstrom Construction, Inc., is not liable.

WHEREFORE, the Additional Defendant, Hallstrom Construction, Inc., demands judgment in its favor and against the Plaintiffs and Original Defendant. **JURY TRIAL DEMANDED.**

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

VERIFICATION

I, VICTORIA A. DOKSA, SECRETARY of

Hallstrom Construction, Inc. verify that the averments made in the foregoing Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d) are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

HALLSTROM CONSTRUCTION, INC.

By Victoria A. Doksa
(Title) Sec.

CERTIFICATE OF SERVICE

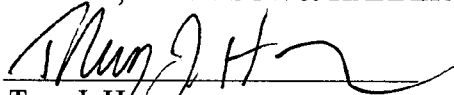
I certify that a true and correct copy of the foregoing Answer, New Matters and New Matter Pursuant to Pa.R.C.P. 2252(d) was served on the 30th day of December, 2001, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

FILED

DEC 05 2001

m/1:40/was
William A. Shaw
Prothonotary

no cert copies



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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.
2001-00263-CD

NOTICE OF SERVICE OF INTERROGATORIES

TO: William Shaw
Court of Common Pleas of Clearfield County, PA
Clearfield, PA 16830

Please take notice that the undersigned has served the original and two copies
of Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center's
First Set of Interrogatories to Plaintiffs by mailing them, first-class, postage prepaid, on
this date to the following:

FILED

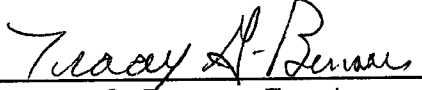
DEC 05 2001

M/1:35/104
William A. Shaw
Prothonotary

1 cert to Att

E. 12/5

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801


Tracey G. Benson, Esquire

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

Counsel for Defendant
Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

Dated: December 4, 2001

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.
2001-00263-CD

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **NOTICE OF SERVICE OF INTERROGATORIES**, was hereby served by depositing the same within the custody of the United States Postal Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

Troy J. Harper, Esq.
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By: Tracey G. Benson
Tracey G. Benson

Dated: December 4, 2001

FILED

DEC 05 2001

William A. Shaw
Prothonotary

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO. 01-263-CD

FILED

DEC 14 2001

William A. Shaw
Prothonotary

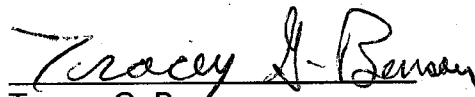
REPLY TO NEW MATTER

Defendant Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center ("Best Western"), by its counsel Tracey G. Benson, Esquire, and Miller, Kistler, Campbell, Miller, Williams & Benson, Inc. hereby responds to the New Matter Crossclaim of additional defendant Hallstrom Construction, Inc. as follows:

19. The allegations contained in paragraph 19 of Hallstrom's New Matter constitute conclusions of law to which no response is required. To the extent that a response is deemed to be required, defendant Best Western denies each and every allegation contained in paragraph 19 of the New Matter, pursuant to Pa.R.Civ.P. 1029(e).

20. The allegations contained in paragraph 20 of Hallstrom's New Matter constitute conclusions of law to which no response is required. To the extent that a response is deemed to be required, defendant Best Western denies each and every allegation contained in paragraph 19 of the New Matter, pursuant to Pa.R.Civ.P. 1029(e).

WHEREFORE, defendant Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center prays that the New Matter Crossclaims asserted against it by the additional defendant Hallstrom Construction, Inc., whether for sole liability to the plaintiff, contribution, or indemnity, be dismissed, and that judgment be entered in favor of this defendant and against the additional defendant on its New Matter Crossclaims.


Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER & WILLIAMS, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

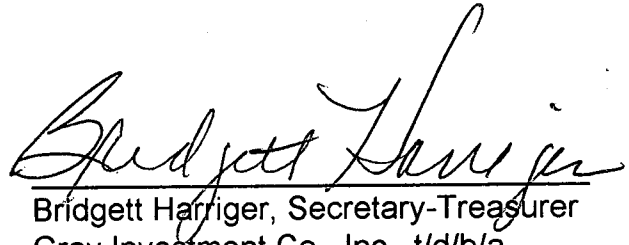
Counsel for Defendant
Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

Dated: December 13, 2001

VERIFICATION

I, **Bridgett Harriger, Secretary-Treasurer, Gray Investment Co., Inc., t/d/b/a Best Western Motor Inn & Conference Center**, state that the facts contained in the foregoing **REPLY TO NEW MATTER** are true and correct to the best of my knowledge, information and belief.

I make this Verification pursuant to 18 Pa.C.S.A., Section 4904 pertaining to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Bridgett Harriger", is written over a horizontal line.

Bridgett Harriger, Secretary-Treasurer
Gray Investment Co., Inc., t/d/b/a
Best Western Motor Inn & Conference
Center

NOTED
RECEIVED
JAN 11 2009
JAN 11 2009
JAN 11 2009

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.

CERTIFICATE OF SERVICE

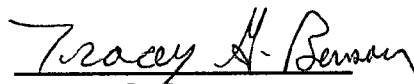
I hereby certify that a copy of the foregoing **REPLY TO NEW MATTER**, was
hereby served by depositing the same within the custody of the United States Postal
Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 1580

Troy J. Harper, Esq.
293 Main Street
Brookville, PA 15825-1291

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:


Tracey G. Benson

Dated: December 13, 2001

FILED

DEC 14 2001

William A. Shaw
Prothonotary

NO
cc

DENNISON, DENNISON & HARPER
ATTORNEYS AT LAW
293 MAIN STREET
BROOKVILLE, PENNSYLVANIA 15825

6x

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
husband and wife,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Motion to Compel

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, PA 15825
(814)849-8316

FILED

MAR 07 2002
m/1:55/noe
William A. Shaw
Prothonotary

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001 - 263, C. D.

AND NOW, comes the Additional Defendant, Hallstrom Construction, Inc., by its attorneys, Dennison, Dennison & Harper, who file the following Motion to Compel Pursuant to Pa.R.C.P. 4019:

2. On or about May 16, 2001, the Plaintiffs filed a Complaint alleging that Brenda L. Grenier, one of the Plaintiffs, was injured in a slip and fall accident which occurred on or about February 28, 1999, at the Original Defendant's business premises located at 82 North Park Place, DuBois, Clearfield County, Pennsylvania.

3. On or about June 25, 2001, the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, filed an Answer and New Matter to Plaintiffs' Complaint.

4. On or about July 3, 2001, the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, filed a Third Party Complaint against the Additional Defendant, Hallstrom Construction, Inc.

5. On or about December 3, 2001, the Additional Defendant, Hallstrom Construction, Inc., filed an Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d) in response to the Original Defendant, Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center's, Third Party Complaint.

6. On or about November 14, 2001, the Additional Defendant, Hallstrom Construction, Inc., served a First Set of Interrogatories and a First Set of Request for Production of Documents Directed to Plaintiffs upon counsel for the Plaintiffs. A true and correct copy of the Interrogatories, Request for Production of Documents and Certificate of Service are attached hereto as "Exhibit A" and made part hereof.

7. Pursuant to Pa.R.C.P. 4006 (a)(2) and 4009.12, the Plaintiffs' Answers to the Additional Defendant's First Set of Interrogatories and First Set of Request for Production of Documents were due on or before December 14, 2001.

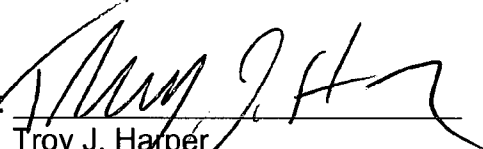
8. The Plaintiffs failed to answer the Interrogatories and reply to the Request for Production of Documents by December 14, 2001.

9. By letter dated January 21, 2002, directed to counsel for the Plaintiffs, counsel for the Additional Defendant, Hallstrom Construction Inc., requested that the Plaintiffs respond to the Interrogatories and First Set of Request for Production of Documents within fifteen (15) days. A true and correct copy of Additional Defendant's counsel's file copy of the letter dated January 21, 2002, is attached hereto as "Exhibit B" and made part hereof.

10. To date, the Plaintiffs have failed to respond to the Interrogatories and Request for Production of Documents.

WHEREFORE, the Additional Defendant, Hallstrom Construction, Inc., requests this Honorable Court to enter an Order directing the Plaintiffs to file full and complete answers to the Interrogatories and responses to the Request for Production of Documents within twenty (20) days, and, if the Plaintiffs fail to file full and complete answers and responses within the allotted time, to impose appropriate sanctions and such other relief the Court deems appropriate.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: First Set of Interrogatories
Directed to Plaintiffs

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

EXHIBIT

A

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2001 - 263 C.D.

FIRST SET OF INTERROGATORIES DIRECTED TO PLAINTIFFS

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

You are hereby required to answer the following Interrogatories under oath, pursuant to the Pennsylvania Rules of Civil Procedure, within thirty (30) days after service hereof. These Interrogatories shall be deemed continuing so as to require supplemental answers if further information not contained in the answers to the following Interrogatories is obtained between the time the answers hereto are filed and the time of the trial.

**YOU ARE HEREBY REQUESTED TO ANSWER EACH OF THE FOLLOWING
INTERROGATORIES WITH RESPECT TO THE PLAINTIFF, BRENDA L. GRENIER,
UNLESS INDICATED OTHERWISE:**

1. Please provide the full name, current address, date of birth, social security number, and marital status including the date of any marriages and divorces for each Plaintiff.

2. Please provide the address where each Plaintiff was residing at the time of the incident alleged in the Plaintiffs' Complaint and provide the names, ages and your relationship to every other person residing at said address at that time.

3. Please list the names, addresses and telephone numbers of all physicians and medical care providers seen by you for the injuries which you allege you sustained in the incident described in your Complaint and the dates on which you were treated by that person.

4. Please list the names and addresses of all hospitals, clinics and convalescent homes wherein you received medical attention for the injuries you allege were caused by the incident described in your Complaint and list the dates on which you were treated at each of the institutions listed.

5. Please set forth an itemized list of all charges made by all those medical care providers listed in the answers to Interrogatories 3 and 4 and attach copies of all bills presented to you by the same.

6. If you have ever in your lifetime suffered from any injuries, illnesses, diseases, sicknesses, or abnormalities which required any type of medical treatment involving those portions of your body which you allege were injured in the incident described in your Complaint, including but not limited to your legs, hips, knees, ankles and feet, set forth the following:

a. the names and addresses of all doctors or hospitals that rendered service in connection therewith and the nature of the service or treatment rendered;

b. the type and/or nature of the injuries, illnesses, diseases, sicknesses, or abnormalities;

c. whether the injuries, illnesses, diseases, sicknesses, or abnormalities were the result of any type of accident;

(1) If the answer to subparagraph c. is yes, please provide the following information:

(a) the date, time, location and nature of the accident; and

(b) whether any lawsuit was filed as the result of the accident, and if so, the name and docket number of the Court where the lawsuit was filed.

7. Please state whether you suffered from any emotional, mental and/or nervous condition prior to the date of the incident described in your Complaint. If yes, please provide the name, address and telephone number of any medical care provider including any doctor, therapist, psychologist or psychiatrist who provided any treatment for such condition.

8. Please provide the names, addresses and telephone numbers of any and all physicians, doctors or medical care providers who have treated you:

a. as your family physician in the last ten (10) years; and

b. for any injury, sickness or disease in the last ten (10) years.

9. Please identify in detail to the following for each person whom you expect to call as an expert witness at trial:

a. full name, home address, business address;

b. the subject matter on which the expert is expected to testify;

c. the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

10. Is any Plaintiff making a claim for past, present or future lost wages as a result of the incident described in the Complaint? If so, state the following for each Plaintiff making such claim:

a. the following information as of the time of the incident described in your Complaint:

(1) the name and address of your employer at the time of the incident;

(2) the date you started your employment with the employer;

(3) the date you last worked for your employer prior to the accident;

(4) the nature of your work;

- (5) your hourly wage or salary;
- (6) the number of hours you worked on average per week;
- (7) the number of work days lost and the dates of those lost days; and
- (8) the amount of any wages or income lost.

b. the following information at the present time;

- (1) the name and address of your employer;
- (2) the date you started your employment with your current employer;
- (3) your hourly wage or salary; and
- (4) the number of hours you work on average per week.

c. Please attach copies of your Federal Income Tax Returns for years 1995 through 2000.

11. Have you ever made application or claim for any Workmen's Compensation Benefits?

If yes, please state the following for each application:

- a. the name and address of your employer at the time of the application or claim;**
- b. the date on which you made any application or claim for such benefits;**
- c. the nature and extent of the injury or condition which was the basis for any such application or claim; and**
- d. the date on which the injury or condition began which was the basis for any such application or claim.**

12. Are you now receiving or have you ever received any income or benefits under any disability, pension or income insurance policy or any Workmen's Compensation from any agency, company, person, corporation, state or governmental agency?

If yes, please state the following:

- a. under what program or policy you received any payment;**

b. the dates you received such payments;

c. the injuries or disability for which you received any payment and when such injuries or disability arose;

d. the name of the company, person, corporation or agency which made any payments;

e. whether you now have any permanent disability as a result of such injuries or disability for which you received any payments, and if so, the nature and extent of the disability;

f. whether you had a disability at the time of the incident referred to in your Complaint, and if so, the nature and extent of the disability.

13. Please provide the name, home address, business address (if any), and your relationship to any person known to you who witnessed the events: (1) within one hour before the incident described in your Complaint; (2) at the time of the incident described in your Complaint; and (3) within one hour after the incident described in your Complaint.

14. Please state the names, home addresses, business addresses (if any) and job classifications of all persons whom you intend to call as nonexpert witnesses on your behalf at the trial of this case and the substance on which you expect them to testify.

15. In regard to the date of the incident described in the Complaint, please state in detail your activities and whereabouts for the twenty-four (24) hour period preceding the incident including, but not limited to your place of origin, your destination, and the nature and length of any stops you made.

16. Please state whether or not you had taken any prescription or nonprescription medication within the twenty-four (24) hour period preceding the incident. If yes, please provide the amount/dosage and name of the medication and the time it was taken.

17. Please state whether or not you were working within the scope of your employment at the time of the accident. If yes, please provide the following information:

- a. the name, address and telephone number of your employer; and
- b. whether or not you provided any written or recorded report to your employer concerning the events of the accident.

18. Please state in detail and in your own words how the incident described in your Complaint occurred.

19. Have you ever been involved in any other accident including a slip and fall or motor vehicle or other accident where you received any type of injury?

If the answer to this Interrogatory is yes, please provide the following information for each accident:

- a. the date and location of the accident;

b. the names and addresses of any other persons involved in the accident;

c. a description in detail of the events of the accident;

d. the nature of any injuries you received in the accident;

e. the names and addresses of any medical care providers who treated you for any injuries;

f. whether any lawsuit was filed as the result of the accident, and if so, the name and docket number of the Court where the lawsuit was filed and the name and address of the attorney or law firm which represented you;

g. the name, address and claim number assigned by any insurance company that provided any type of benefits or coverage for the accident; and

h. Attach a copy of any accident, incident or police report issued as a result of the accident.

20. With regard to each Plaintiff, have you ever been charged with or convicted of any crime other than a traffic citation; if yes, please provide the following information:

a. the date, state and county where the criminal offense took place;

b. the name and address of the issuing authority, i.e. police department; and

c. the final disposition of the criminal charge.

21. Please provide a detailed list of any incidental or out-of-pocket expenses you allege you incurred as a result of the accident described in your Complaint, including the following information for each of the expenses:

- a. the amount of the expense;
- b. the date of the expense;
- c. a description of what the expense was for;
- d. the name of the person, agency or company the expense was paid to; and
- e. Attach copies of any records in your possession supporting the expenses.

22. With regard to any medical bills you have incurred as a result of the incident described in your Complaint, please state the following:

- a. the name of any insurance company, group program, HMO or other agency which has provided payment for said bills;

b. whether or not you have been notified of any lien and/or subrogation claim in regard to any payments made by any insurance company, group program, HMO, or other agency, and if so, the amount of any such lien and/or subrogation claim. Also, please provide copies of any documents identifying the notice and amount of the lien.

23. Please state whether any representative, investigator, employee of yours or of your attorney has conducted any investigation on your behalf relating to your claims in this matter.

If yes, please provide the following information:

a. the name, address, employer, job title, position or capacity of each such person;
and

b. whether any such person has prepared any notes, memoranda or summaries in connection with any such investigation.

24. Please state the purpose for your being present at the Best Western Inn & Conference Center on the date of the incident described in your Complaint.

25. Please state in detail the weather conditions at the time of the incident described in your Complaint and in the five (5) hour period prior to the incident.

26. With regard to the shoes or overshoes you were wearing at the time of the incident described in your Complaint, please state the following:

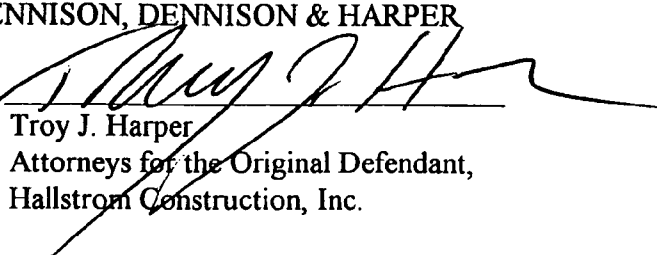
- a. the type and brand of shoes;
- b. the name of the manufacturer;
- c. the type of sole on the shoe; and
- d. Please state whether or not you or one of your representatives still has the shoes.

27. State in detail the lighting conditions in the area of the incident described in your Complaint.

28. State the approximate time of the incident described in your Complaint.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Original Defendant,
Hallstrom Construction, Inc.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: First Set of Request for
Production of Documents Directed to
Plaintiffs

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2001 - 263 C.D.

**FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFFS**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

You are hereby required to answer the following Request for Production of Documents under oath, pursuant to the Pennsylvania Rules of Civil Procedure, within thirty (30) days after service hereof. This Request for Production of Documents shall be deemed continuing so as to require supplemental answers if further information not contained in the Answers to the following Request for Production of Documents is obtained between the time the Answers hereto are filed and the time of the trial.

**PROVIDE COPIES OF THE FOLLOWING REQUESTED INFORMATION REGARDING
THE ALLEGED INCIDENT AND ALLEGED INJURIES DESCRIBED IN THE
PLAINTIFFS' COMPLAINT:**

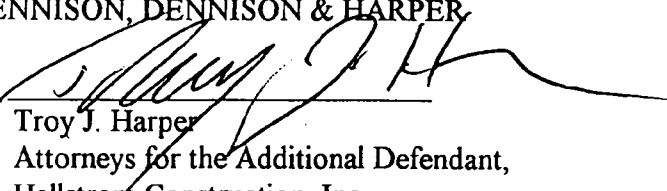
1. All medical and hospital records, reports, bills and invoices relating to any injuries or damages alleged to have been caused by the occurrence described in Plaintiffs' Complaint.
2. All medical and hospital records, bills and invoices relating to prior or subsequent injuries to the same parts of the body claimed to have been injured as a result of the occurrence described in Plaintiffs' Complaint.
3. All statements; whether written, recorded, signed and/or unsigned, of the Plaintiffs or Defendants.
4. All statements; whether written, recorded, signed and/or unsigned, of all witnesses or potential witnesses.
5. All expert/nonexpert written reports.
6. All photographs, videotapes or other graphic representations relating to the place of the incident or the persons or other things involved.
7. Maps, drawings, charts and sketches relating to the place of the incident or the persons or things involved.
8. Any reports, notes, summaries or memoranda made by you or any person performing any investigation on your behalf or on behalf of your counsel.

9. Any notices, correspondences, invoices, agreements or other documents in regard to any claim for subrogation, reimbursement or a lien for any medical expenses paid on behalf of the Plaintiffs.

10. All incident or accident reports you completed.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

Plaintiffs,

**GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,**

HALLSTROM CONSTRUCTION, INC.,

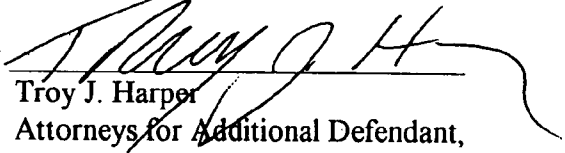
Number 2001 - 263 C.D.

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

and one certified copy of the same was served in the same manner addressed to:

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Belleville, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

January 21, 2002

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

RE: Grenier v. Gray Investment Co., Inc. v. Hallstrom Construction, Inc.
No. 2001 - 263 C.D. (Clearfield County)

Dear Toni:

As you know, on November 14, 2001, I served you with a set of discovery requests. In reviewing my file, I found that to date I have not received your clients' answers to the same.

I request that you please forward your clients' answers to the discovery requests within the next fifteen (15) days.

Thank you for your cooperation.

Very truly yours,

DENNISON, DENNISON & HARPER

Troy J. Harper

cc: Tracey G. Benson, Esq.

EXHIBIT
B

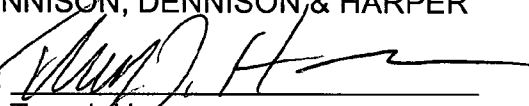
CERTIFICATE OF SERVICE

I certify that a copy of the Motion to Compel was served on the 6th day of March, 2002, by United States Mail, First Class, Postage Prepaid, addressed to:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

J.

FILED

MAR 08 2002

William A. Shaw
Prothonotary

013:3884

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Atty Dennisson

WAS

DENNISON, DENNISON & HARPER
ATTORNEYS AT LAW
293 MAIN STREET
BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 18 2002

h 11:30 AM
William A. Shaw
Prothonotary

Plaintiffs,

Defendant,

Additional Defendant.

* Number 2001 - 263 C.D.

By Troy J. Harper
Troy J. Harper
 Attorneys for Additional Defendant,
 Hallstrom Construction, Inc.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant :

No. 2001 - 263

FILED

JUN 07 2002
012:54/11ccatty Tona Cherry
William A. Shaw
Prothonotary
EPL

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2002, a true and correct copy of the Response to First Set of Request for Production of Documents Directed to Plaintiffs was sent to the following persons by mailing the same to them by United States First Class Mail, postage prepaid, by depositing in the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

TROY J. HARPER, ESQ.
Dennison, Dennison & Harper
Attorneys at Law
293 Main Street
Brookville, PA 15825

TRACEY G. BENSON, ESQ.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823

GLEASON, CHERRY AND CHERRY, L.L.P.

By


Attorneys for Plaintiffs

Dated: May 31, 2002

DENNISON, DENNISON & HARPER
ATTORNEYS AT LAW
293 MAIN STREET
BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

vs.

Type of Case: Civil Division

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

m/11561no cc
William A. Shaw
Prothonotary

VS.

VS.

[illegible]

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Mark Piasio, 90 Beaver Drive, Suite 110B, DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

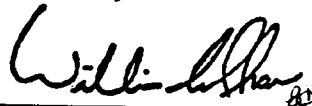
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

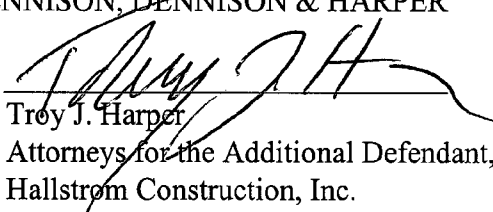
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

mllsblnocc
William A. Shaw
Prothonotary

60
9/25

Plaintiffs,

Defendant,

Additional Defendant.

*

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* Number 2001 - 263 C.D.

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Crum & Forster Insurance, 530 E. Swedesford Road,
Wayne, PA 19087 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

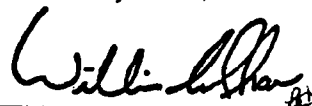
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Supreme~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about May 29, 1994, involving your insured, Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, with Claim Number PHU80054554.

CERTIFICATE OF SERVICE

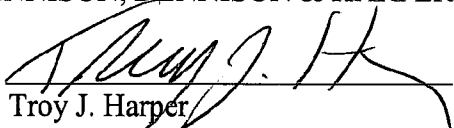
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124 North Allegheny Street
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DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

William A. Shaw
Prothonotary

VS.

VS.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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*
* Civil Action - Law
*
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*
*
*
* Number 2001 - 263 C.D.

By 
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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
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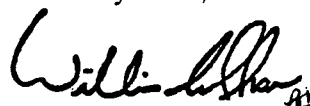
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(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Seal of~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

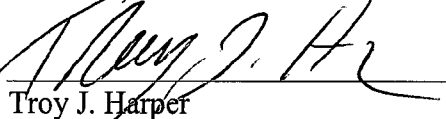
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P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

mlls6/nocc
William A. Shaw
Prothonotary

VS.

VS.

[illegible]

By 
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Outpatient Physical Therapy Dept., DuBois Regional
Medical Center, P. O. (Name of Person or Entity)
Box 447, DuBois, PA 15801

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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Supreme~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

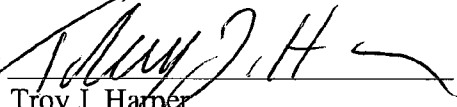
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124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

ml:56/ncc
William A. Shaw
Prothonotary *WAS*

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois,
PA 15801
(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

Dennison, Dennison & Harper, 293 ^(Address) Main Street, Brookville, PA 15825

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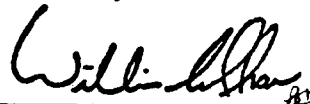
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NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Seal of~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

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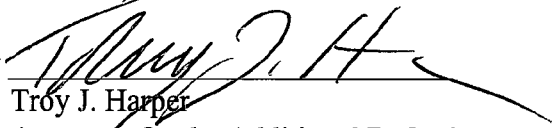
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DENNISON, DENNISON & HARPER

By


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Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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vs.

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t/d/b/a BEST WESTERN INN &
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Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002
m/lisb/nccc
William A. Shaw
Prothonotary *WAS*

VS.

VS.

[illegible]

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
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Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Primary Care Associates, 145 Hospital Avenue,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Deputy~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

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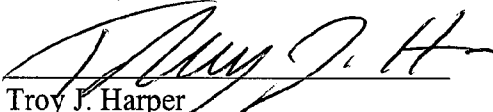
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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
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Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

mll:sl/noc
William A. Shaw
Prothonotary

VS.

vs.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2001 - 263 C.D.

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Garrett W. Dixon, One Dale Avenue, Franklin, PA 16323
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by
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address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

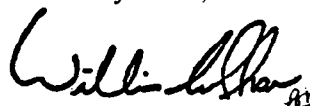
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Deputy~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

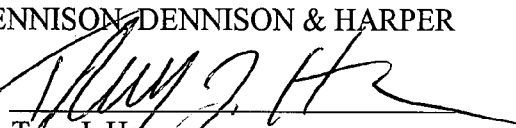
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002
m/1:56/noce
William A. Shaw
Prothonotary *WAS*

VS.

VS.

[illegible]

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (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

Dennison, Dennison & Harper, (Address)
293 Main Street, Brookville, PA 15825

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.

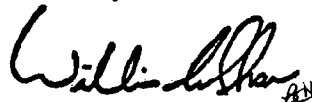
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Deputy~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

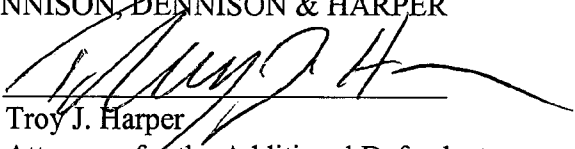
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002

m/lisle/noce
William A. Shaw
Prothonotary

821

VS.

VS.

[illegible]

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Centre Community Hospital, 1800 East Park Avenue,
State College, PA 16803 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Supreme~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

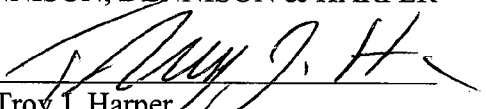
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 13 2002
mlls6indcc
William A. Shaw
Prothonotary

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
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* Civil Action - Law
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* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue,
DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

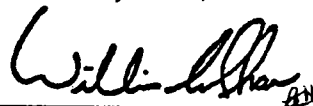
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

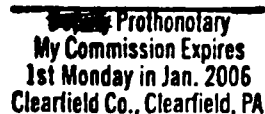
BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to imaging studies, reports, and records for any care and/or treatment.

CERTIFICATE OF SERVICE

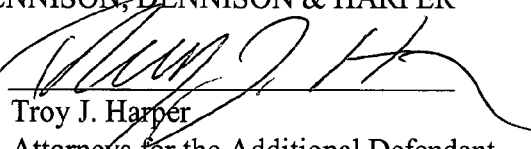
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 19 2002

William A. Shaw
Prothonotary

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, University Orthopaedics Center, 101 Regent Court,
State College, PA 16801 (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

(Address)
at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Supreme~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1-17-1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

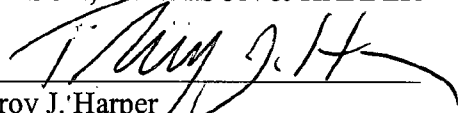
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 16th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

FILED

M 11:32 AM
AUG 19 2002

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

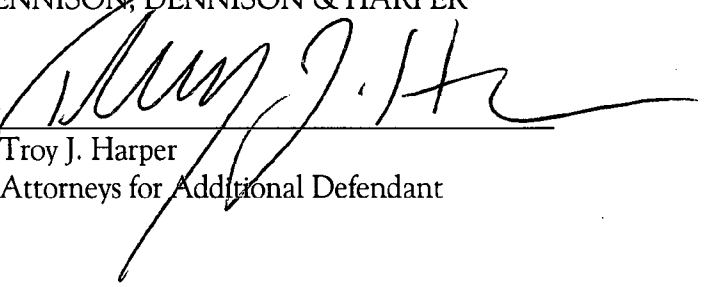
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

VS.

VS.

* Number 2001 - 263 C.D.

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Primary Care Associates, 145 Hospital Avenue,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

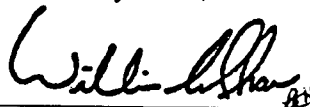
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

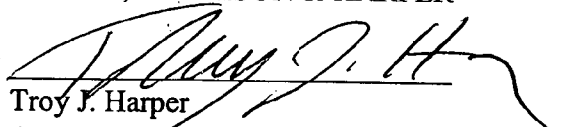
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

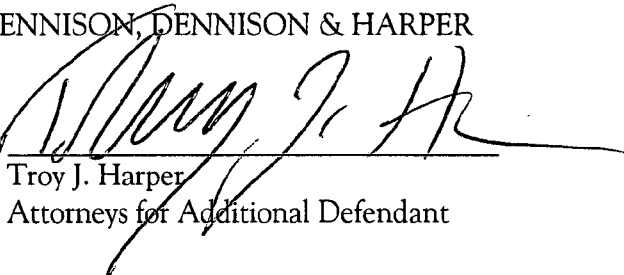
I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage
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P. O. Box 505
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Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

FILED

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OCT 04 2002

no cc
EJ
KSA

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

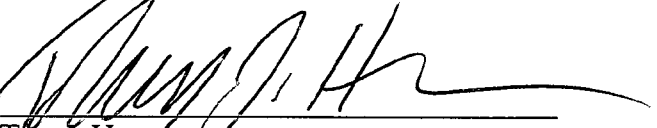
1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

Plaintiffs,

Defendant,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

* Civil Action - Law

* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Centre Community Hospital, 1800 East Park Avenue,
State College, PA 16803 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


Prothonotary
My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

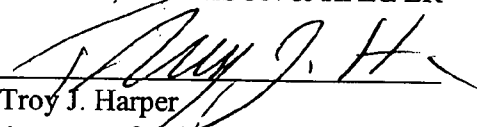
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
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P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

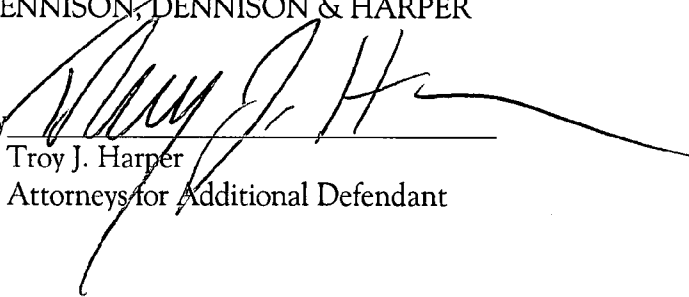
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Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m11:14 NO cc
OCT 04 2002

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
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Subpoena is sought to be served;

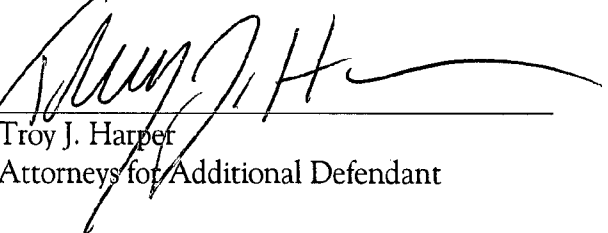
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Mark Piasio, 90 Beaver Drive, Suite 110B, DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

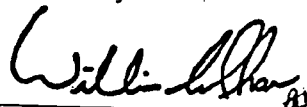
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to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

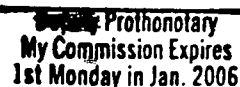
BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

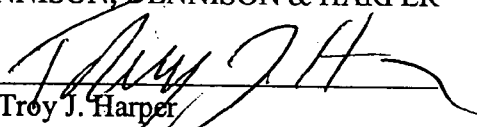
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I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

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DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

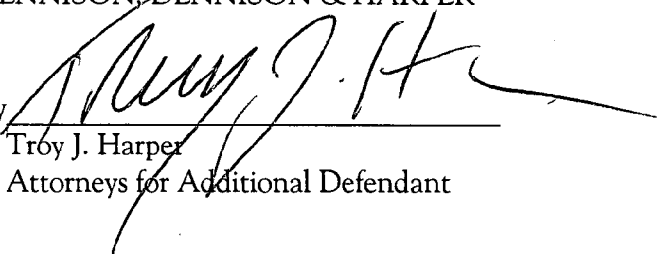
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Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/11/4
OCT 04 2002

NO
CC

William A. Shaw
Prothonotary

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DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
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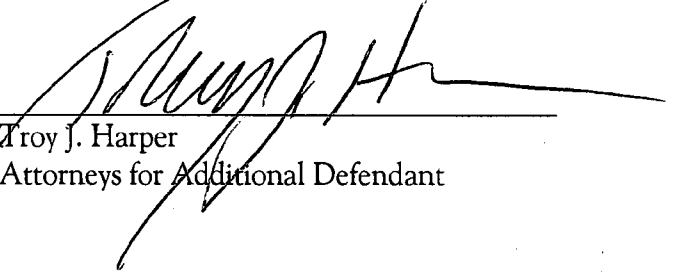
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

Plaintiffs,

Defendant,

Additional Defendant.

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Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Garrett W. Dixon, One Dale Avenue, Franklin, PA 16323
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
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
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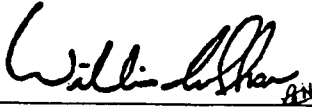
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Prothonotary~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

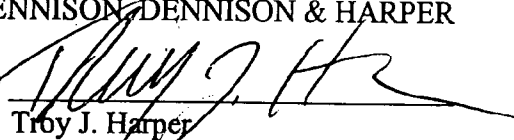
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON DENNISON & HARPER

By



Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.

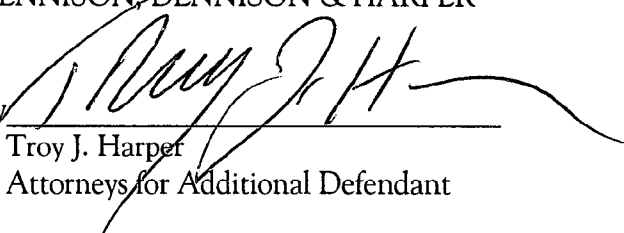
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

FILED

m/14 NO
OCT 04 2002 cc
SS

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

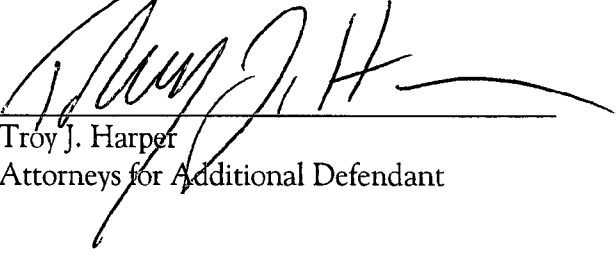
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2001 - 263 C.D.

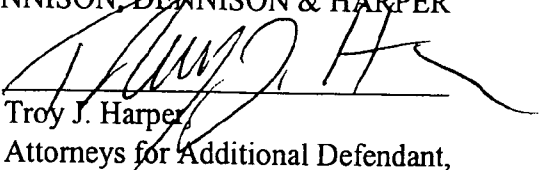
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By 

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (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

Dennison, Dennison & Harper, (Address)
293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Deputy Prothonotary~~
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

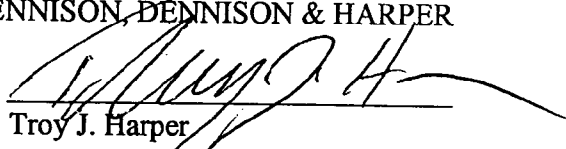
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

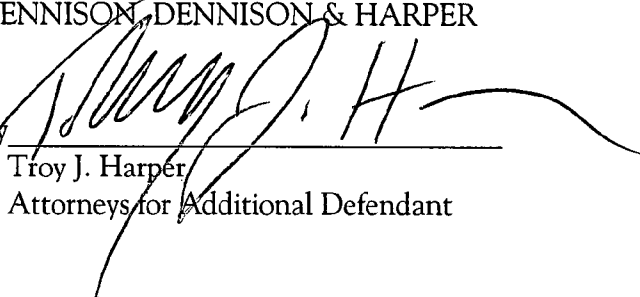
I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage
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Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
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P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

011:14
OCT 04 2002

no
cc

[Handwritten signature]

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

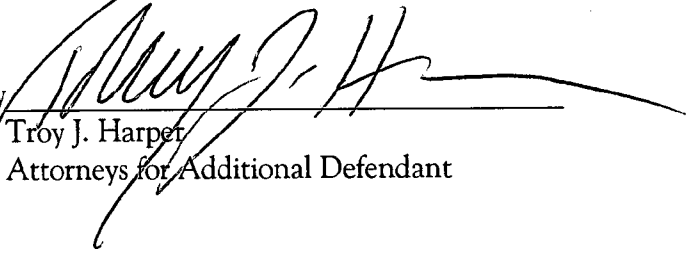
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

Plaintiffs,

VS.

Defendant,

VS.

Additional Defendant.

*

*

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*

* Number 2001 - 263 C.D.

PA.R.C.P. 4009.21

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue,
DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

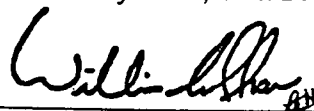
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to imaging studies, reports, and records for any care and/or treatment.

CERTIFICATE OF SERVICE

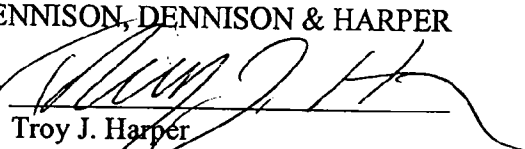
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.

4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage

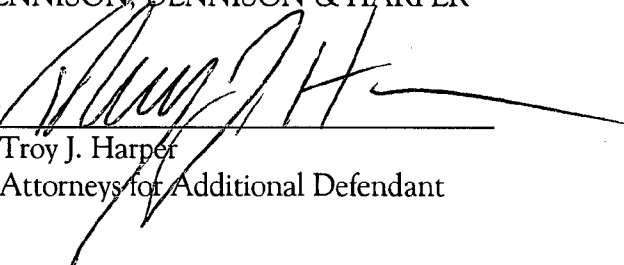
prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/1:14
OCT 04 2002

William A. Shaw
Prothonotary

NO
cc
ED
KED

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

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Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
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Subpoena is sought to be served;

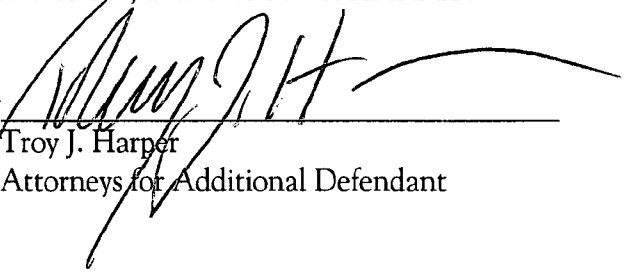
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

Plaintiffs,

VS.

Defendant,

VS.

Additional Defendant.

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* Number 2001 - 263 C.D.

PA.R.C.P. 4009.21

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/16/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, University Orthopaedics Center, 101 Regent Court,
State College, PA 16801 (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

(Address)
at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Deputy~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1-17-1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

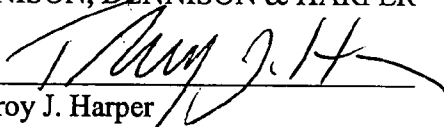
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 16th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.

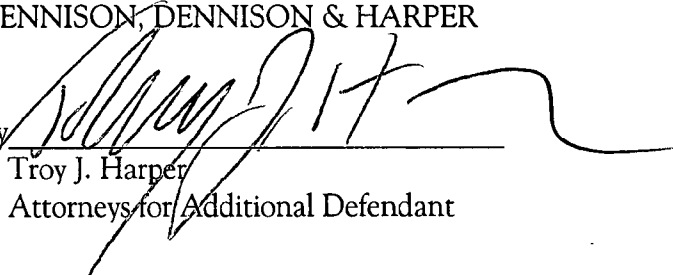
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m111440
OCT 04 2002 CC

EX-125

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

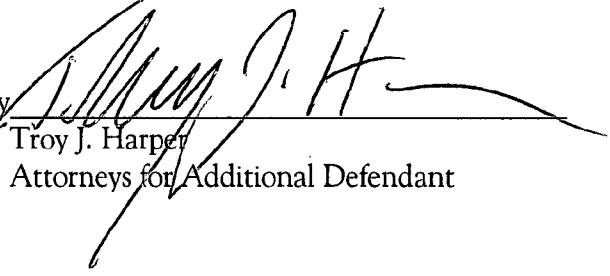
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
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* Civil Action - Law
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* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Crum & Forster Insurance, 530 E. Swedesford Road,
Wayne, PA 19087 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

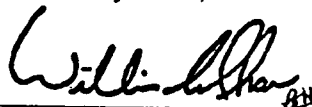
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID #74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


My Commission Expires
1st Monday in Jan. 2006

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about May 29, 1994, involving your insured, Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, with Claim Number PHU80054554.

CERTIFICATE OF SERVICE

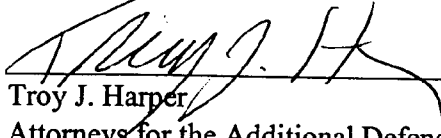
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.

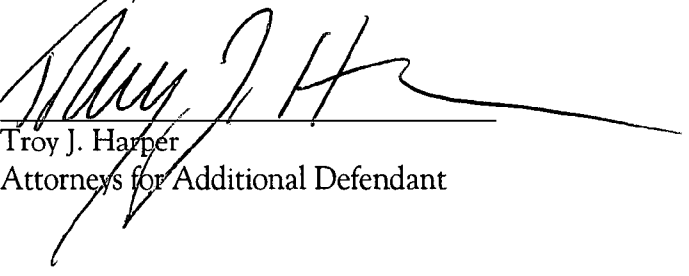
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/r:14
OCT 04 2002

ndcc

[Handwritten signature]

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

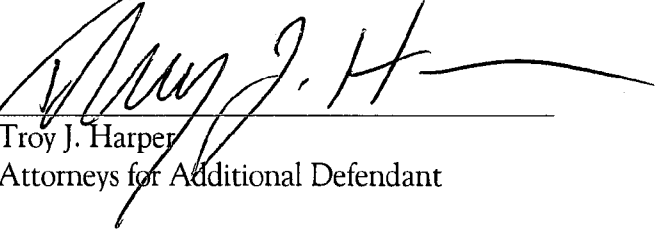
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Action - Law
*

* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: 8/12/02

DENNISON, DENNISON & HARPER

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

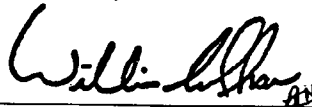
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


My Commission Expires
1st Monday in Jan. 2006

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

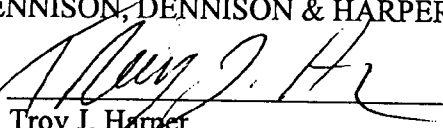
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.

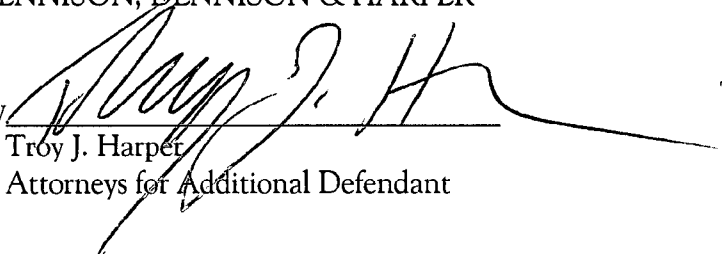
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED
m11:14 NO cc
OCT 04 2002 ~~SP~~

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

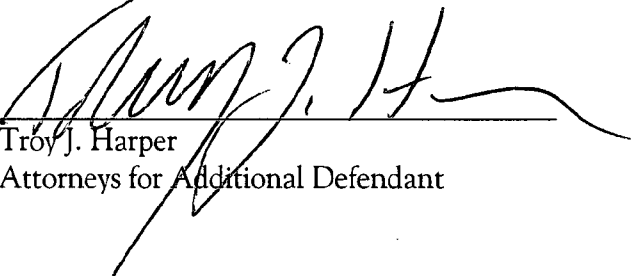
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
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1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;
4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

By Troy J. Harper
Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois,
PA 15801
(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

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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.

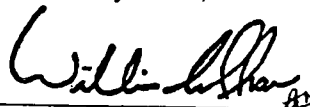
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

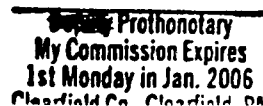
BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co. Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

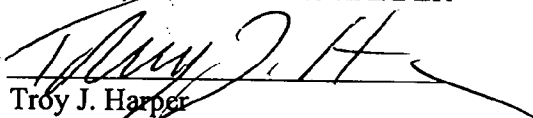
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

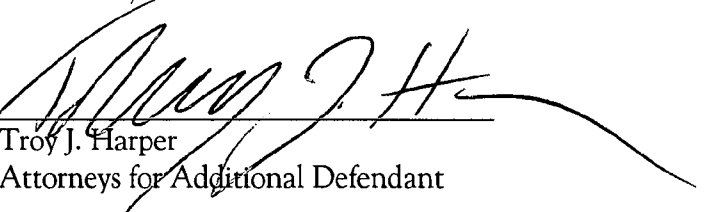
I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage
prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/1/14

OCT 04 2002

NO
CC

~~EX~~

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Additional Defendant, Hallstrom Construction,
Inc., through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

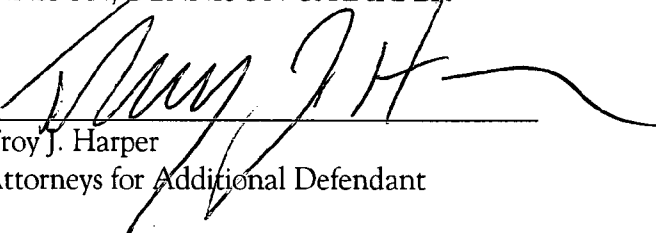
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

A handwritten signature in black ink, appearing to read "Troy J. Harper", is written over a horizontal line. The signature is stylized with a large initial "T" and "H".

Troy J. Harper

Attorneys for Additional Defendant

Dated: October 3, 2002

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Outpatient Physical Therapy Dept., DuBois Regional
Medical Center, P. O. (Name of Person or Entity)
Box 447, DuBois, PA 15801

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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

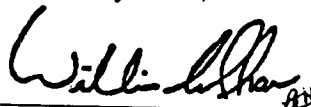
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Supreme~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

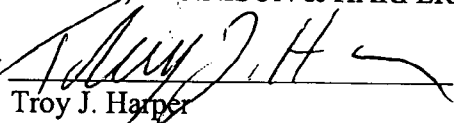
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 12th day of August, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

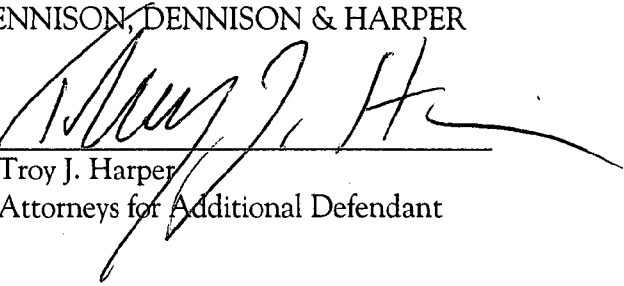
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4009.22 was served on the 3rd day of October, 2002, by United States Mail, First Class, postage
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Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

FILED

m11:14

OCT 04 2002

NO
CC

[Handwritten signature]

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
University Orthopaedics Center
101 Regent Court
State College, PA 16801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of the Records Custodian of the University Orthopaedics Center twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

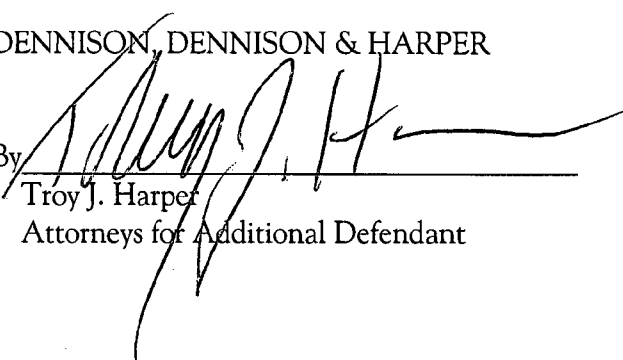
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, University Orthopaedics Center, 101 Regent Court,
State College, PA 16801 (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

(Address)
at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Seal of~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1-17-1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

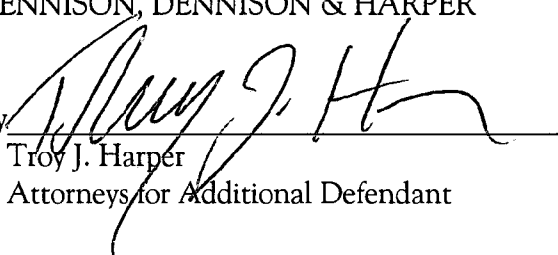
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
University Orthopaedics Center
101 Regent Court
State College, PA 16801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

11:14 No cc
OCT 04 2002

William A. Shaw
Prothonotary

[Handwritten signature]

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Crum & Forster Insurance
530 E. Swedesford Road
Wayne, PA 19087

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of the Records Custodian of Crum & Forster Insurance twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

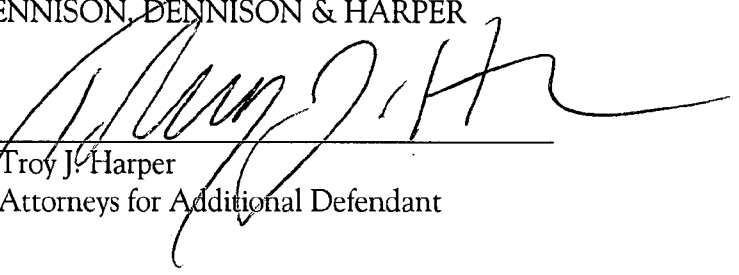
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA.
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Crum & Forster Insurance, 530 E. Swedesford Road,
Wayne, PA 19087 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

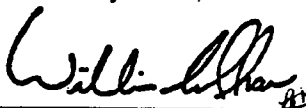
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Seal of Prothonotary~~
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about May 29, 1994, involving your insured, Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, with Claim Number PHU80054554.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

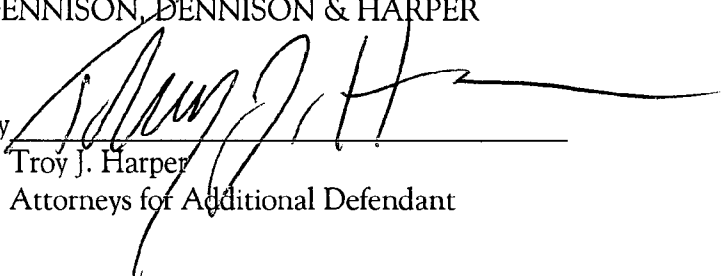
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Crum & Forster Insurance
530 E. Swedesford Road
Wayne, PA 19087

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m11:14
OCT 04 2002

NO
CC

E
JES

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Keystone Rehabilitation Systems
470 Jeffers Street
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will
take the deposition of the Records Custodian of Keystone Rehabilitation Systems twenty (20)
days from the service of this Notice and attached Subpoena upon the same, at the law offices of
Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

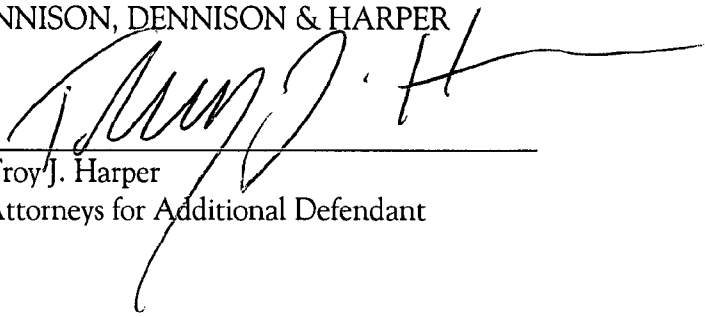
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the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Prothonotary~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

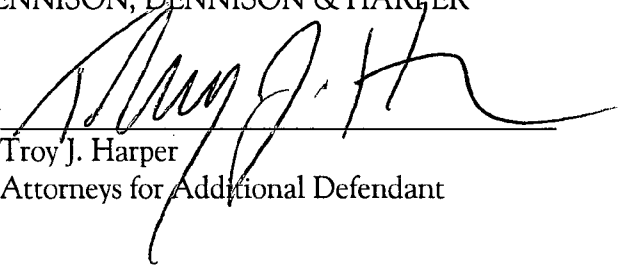
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Keystone Rehabilitation Systems
470 Jeffers Street
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/11:14 NO ce
OCT 04 2002 ~~EL~~

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Outpatient Physical Therapy Dept.
DuBois Regional Medical Center
P. O. Box 447
DuBois, PA 15801

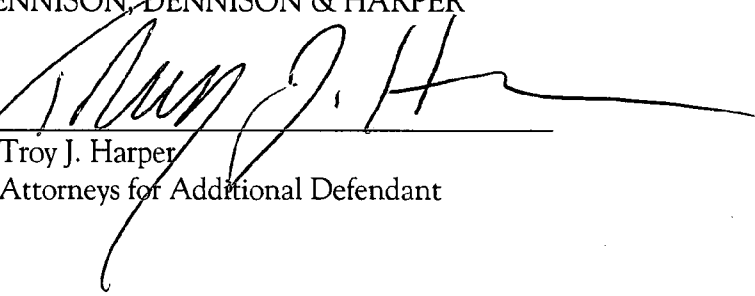
PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will
take the deposition of the Records Custodian of the Outpatient Physical Therapy Dept. of
DuBois Regional Medical Center twenty (20) days from the service of this Notice and attached
Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street,
Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Outpatient Physical Therapy Dept., DuBois Regional
Medical Center, P. O. (Name of Person or Entity)
Box 447, DuBois, PA 15801

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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

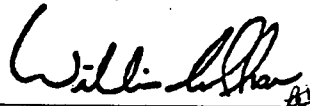
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

~~Deputy~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 03, 2002
Seal of the Court

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

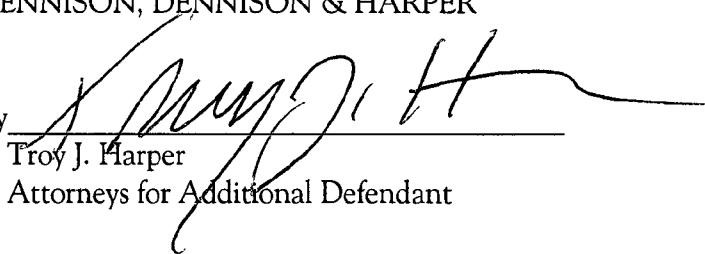
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Outpatient Physical Therapy Dept.
DuBois Regional Medical Center
P. O. Box 447
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

m/1/14 NO
OCT 04 2002 cc
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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
West Penn Orthopaedics
211 Beaver Drive
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of the Records Custodian of West Penn Orthopaedics twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

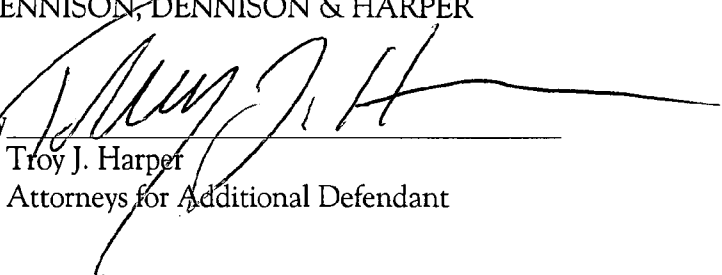
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois,
PA 15801
(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

Dennison, Dennison & Harper, 293 ^(Address) Main Street, Brookville, PA 15825

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.

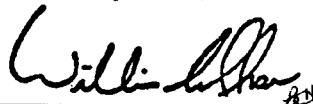
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Notary Public~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

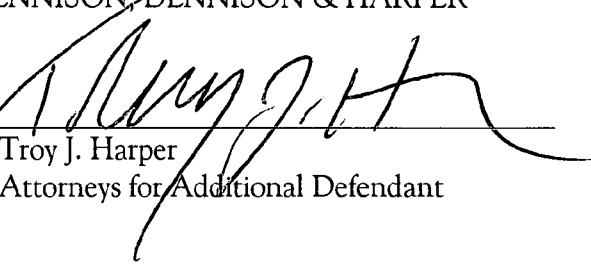
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
West Penn Orthopaedics
211 Beaver Drive
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Primary Care Associates
145 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of the Records Custodian of Primary Care Associates twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

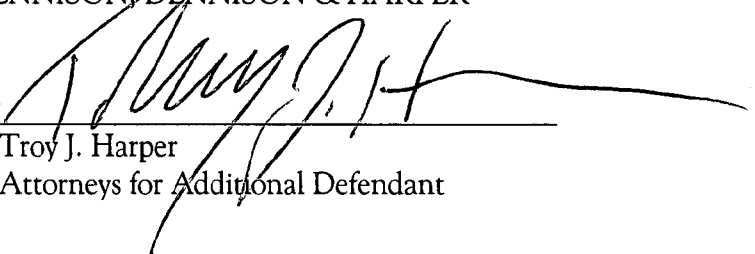
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Primary Care Associates, 145 Hospital Avenue,
DuBois, PA 15801 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
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.

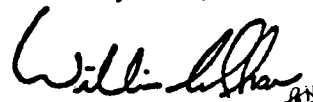
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Prothonotary~~
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

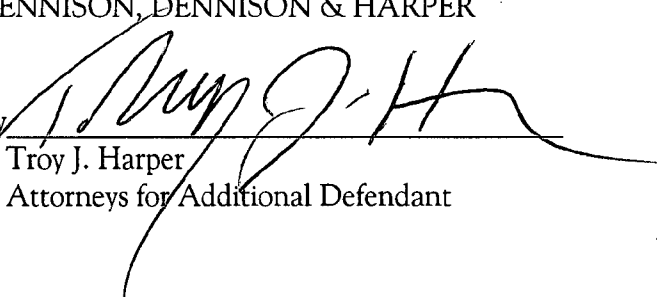
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Primary Care Associates
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED
m/11/14 NO
OCT 04 2002 ce
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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Mark Piasio
90 Beaver Drive
Suite 110B
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will
take the deposition of Dr. Mark Piasio twenty (20) days from the service of this Notice and
attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293
Main Street, Brookville, Pennsylvania 15825.

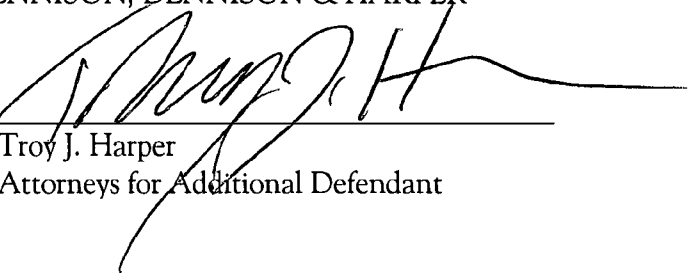
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Mark Piasio, 90 Beaver Drive, Suite 110B, DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Prothonotary~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

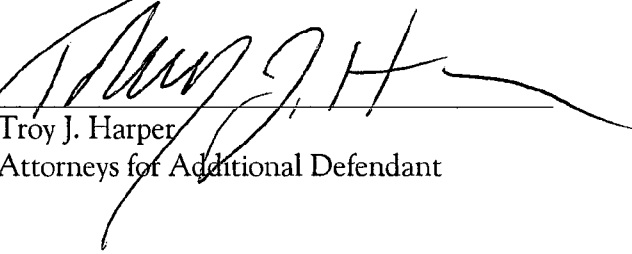
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Mark Piasio
90 Beaver Drive
Suite 110B
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

FILED

MM:14 NO
OCT 04 2002 CC

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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Garrett W. Dixon
One Dale Avenue
Franklin, PA 16323

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of Dr. Garrett W. Dixon twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

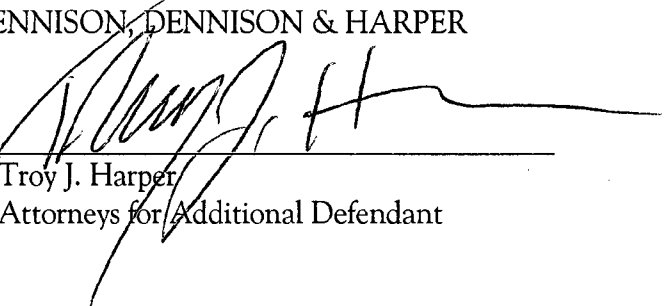
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Dr. Garrett W. Dixon, One Dale Avenue, Franklin, PA 16323
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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.

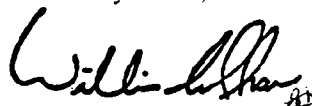
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

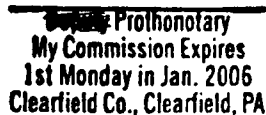
BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court


Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

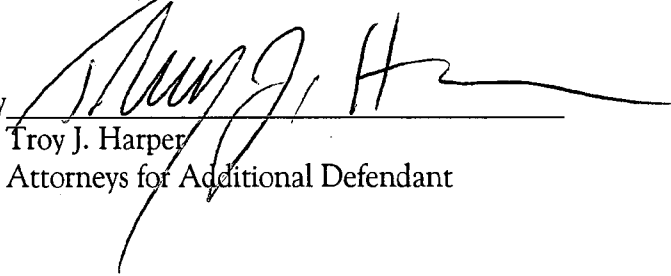
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Garrett W. Dixon
One Dale Avenue
Franklin, PA 16323

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will
take the deposition of the Records Custodian of the DuBois Regional Medical Center twenty
(20) days from the service of this Notice and attached Subpoena upon the same, at the law
offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

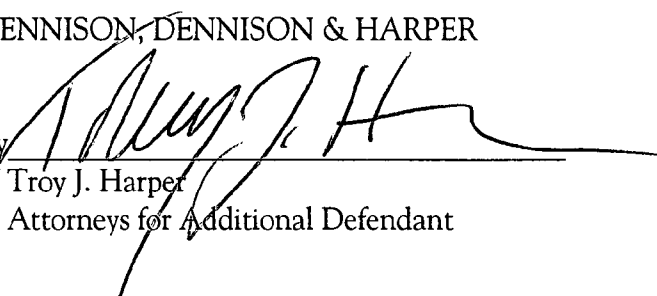
There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

*

*

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (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

Dennison, Dennison & Harper, (Address)
293 Main Street, Brookville, PA 15825

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: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

Deputy Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

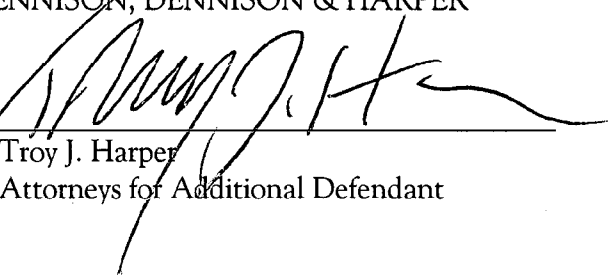
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

FILED
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William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Centre Community Hospital
1800 East Park Avenue
State College, PA 16803

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will take the deposition of the Records Custodian of the Centre Community Hospital twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

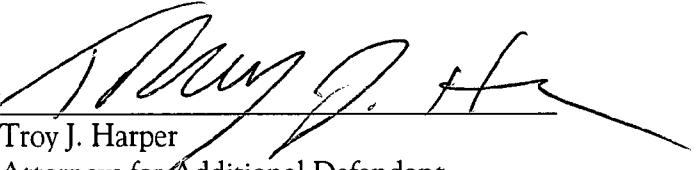
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is

directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, Centre Community Hospital, 1800 East Park Avenue,
State College, PA 16803 (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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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
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(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: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Prothonotary~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

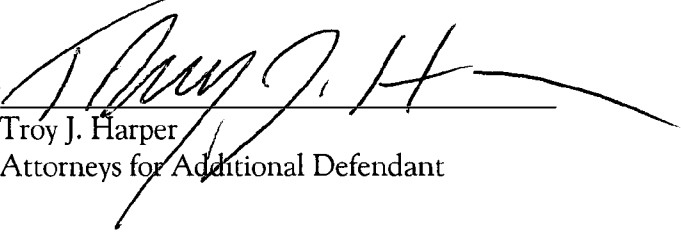
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Centre Community Hospital
1800 East Park Avenue
State College, PA 16803

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

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OCT 04 2002

William A. Shaw
Prothonotary

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DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND
A. GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001-00263-CD

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
The Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 04 2002

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,
Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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* Number 2001-00263-CD

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Magnetic Imaging Center
104 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Additional Defendant, Hallstrom Construction, Inc., will
take the deposition of the Records Custodian of the DuBois Magnetic Imaging Center twenty
(20) days from the service of this Notice and attached Subpoena upon the same, at the law
offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

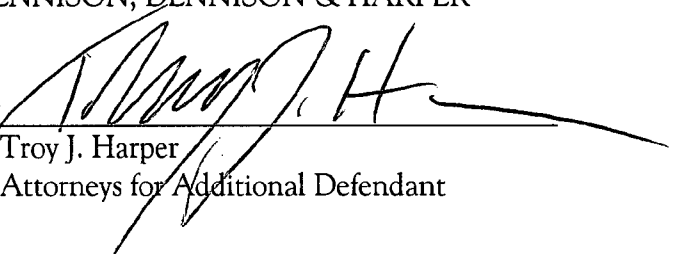
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier, and
Edmund A. Grenier Jr., husband and wife
Plaintiff(s)

Vs.

Gray Investment Co., Inc., t/d/b/a
Best Western Inn & Conference Center
Defendant(s)

Vs.

Hallstrom Construction, Inc.
Additional Defendant

No. 2001-00263-CD

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

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue,
DuBois, PA 15801
(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

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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this subpoena, together with the certificate of compliance, to the party making this request at the
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(20) days after its service, the party serving this subpoena may seek a court order compelling you
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Additional Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, July 03, 2002
Seal of the Court

~~Prothonotary~~ Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Brenda L. Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to imaging studies, reports, and records for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 3rd day of October, 2002, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry & Cherry, L.L.P.
One North Franklin Street
P. O. Box 505
DuBois, PA 15801

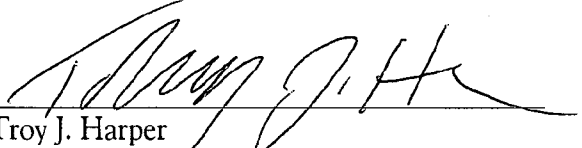
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Magnetic Imaging Center
104 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Additional Defendant

FILED

MI 114 No cc
OCT 04 2002

William A. Shaw
Prothonotary

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

)
)
)
) No. 2001-263 C.D.
)
) **Type of Pleading:** Motion to Compel
)
)
) **Filed on Behalf of:** Defendant Gray
) Investment Co., Inc. t/d/b/a Best
) Western Conference Center
)
) **Counsel of Record for this Party:**
)
) Tracey G. Benson, Esq.
) Julia R. Cronin, Esq.
) Miller, Kistler, Campbell, Miller,
) Williams & Benson, Inc.
) 124 N. Allegheny Street
) Bellefonte, PA 16823
) 814-355-5474

FILED

OCT 23 2002

William A. Shaw
Prothonotary

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

BRENDA L. GRENIER and	)	
EDMUND A. GRENIER, JR.,	)	
Husband and Wife,	)	
	)	No. 2001-263 C.D.
Plaintiffs	)	
	)	
vs.	)	
	)	
GRAY INVESTMENT CO., INC.,	)	
t/d/b/a BEST WESTERN INN &	)	
CONFERENCE CENTER,	)	
	)	
Defendant	)	
	)	
vs.	)	
	)	
HALLSTROM CONSTRUCTION, INC.,	)	
Additional Defendant	)	

MOTION TO COMPEL

NOW COMES the Defendant, Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center (hereinafter "Gray Investment Co."), by and through its counsel, MILLER, KISTLER, CAMPBELL, MILLER, WILLIAMS & BENSON, INC., and files this Motion to Compel Answers to Defendant's First Set of Interrogatories and a Response to the Request for Production of Documents Directed to Plaintiffs. In support thereof, Defendant Gray Investment Co. states as follows:

1. This matter was commenced by Plaintiffs' filing of a Praecipe for Writ of Summons on or about February 23, 2001.
2. Pursuant to a Rule issued upon Praecipe of Defendant Gray Investment Co., Plaintiffs filed a Complaint on or about May 16, 2001.

3. Plaintiffs' Complaint alleges that on or about February 28, 1999, Plaintiff-wife slipped and fell due to an accumulation of water upon the grate in the entryway of the Best Western Inn & Conference Center.

4. Plaintiff-wife alleges that as a result of the accident, she sustained serious, painful and possibility permanent injury to her knees, left leg, left ankle and hips.

5. On June 25, 2001, Defendant Gray Investment Co. filed an Answer and New Matter to Plaintiffs' Complaint in which it denied liability for the subject accident.

6. On July 3, 2001, Defendant Gray Investment Co. filed a Third Party Complaint against the Additional Defendant, Hallstrom Construction, Inc.

7. On or about December 3, 2001, Additional Defendant Hallstrom Construction, Inc. filed an Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d) in response to Defendant's Third Party Complaint.

8. On or about December 4, 2001, Defendant Gray Investment Co., by and through its counsel, served Interrogatories and a Request for Production of Documents upon Plaintiffs by mailing same by first class, United States mail, postage prepaid and addressed as follows:

Toni M. Cherry, Esquire
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

9. As of this date, Plaintiffs have not served Answers to the aforementioned Interrogatories or a Response to the aforementioned Request for Production of Documents.

10. Plaintiffs' failure to answer the Interrogatories and to respond to the Request for Production of Documents is a violation of Pennsylvania Rules of Civil Procedure 4006 and 4009.12, respectively.

11. By correspondence dated March 21, 2002, counsel for Defendant Gray Investment Co. called to Plaintiffs' counsel's attention the outstanding Interrogatories and Request for Production of Documents, and requested that Plaintiffs provide a response to same within the following two weeks. A copy of said correspondence is attached hereto as Exhibit A.

12. Neither Plaintiffs nor their counsel responded to Defendant's counsel's letter of March 21, 2002, although Plaintiffs' counsel did send Defendant's counsel a copy of Plaintiffs' Response to Additional Defendant Hallstrom Construction, Inc.'s Request for Production of Documents.

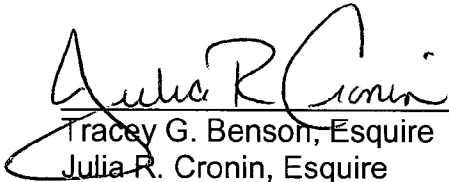
13. On July 31, 2002, counsel for Defendant Gray Investment Co. sent another letter to Plaintiffs' counsel, again asking for responses to the Interrogatories and Request for Production of Documents which were served on or about December 4, 2001. A copy of said correspondence is attached hereto as Exhibit B.

14. To date, Plaintiffs have failed to provide any response to the Interrogatories and Request for Production of Documents.

15. Plaintiffs' refusal and/or failure to answer the outstanding discovery is prejudicial to Defendant Gray Investment Co.

WHEREFORE, Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn and Conference Center prays that this Honorable Court enter an Order compelling the Plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., to provide full and complete

responses, without objections, to the Interrogatories and Request for Production of Documents Directed to Plaintiffs within fifteen (15) days of the date of such Order or be barred from producing at trial any and all evidence requested in such discovery.


Tracey G. Benson, Esquire
Julia R. Cronin, Esquire

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 N. Allegheny Street
Bellefonte, PA 16823
814-355-5474

Counsel for Defendant

Dated: 10/22/02

EXHIBIT A

FILE COPY

LAW OFFICES OF
MILLER, KISTLER, CAMPBELL, MILLER, WILLIAMS & BENSON, INC.
A PROFESSIONAL CORPORATION

JOHN R. MILLER, JR.
RICHARD L. CAMPBELL
JOHN R. MILLER, III
TERRY J. WILLIAMS
TRACEY G. BENSON
SCOTT C. ETTER, Ph.D.
ELIZABETH A. DUPUIS
DAVID B. CONSIGLIO
STACY R. PARKS

PLEASE REPLY TO:
BELLEFONTE OFFICE

124 NORTH ALLEGHENY STREET
BELLEFONTE, PA. 16823-1695
(814) 355-5474
GENERAL FAX (814) 355-5340
REAL ESTATE FAX (814) 357-0264
AND
720 SOUTH ATHONTON STREET
STATE COLLEGE, PA. 16801-4628
(814) 234-1500
FAX (814) 234-1549

COUNSEL TO THE FIRM
ROBERT K. KISTLER

March 21, 2002

Toni M. Cherry, Esquire
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

RE: Grenier v. Gray Investment Co., Inc. v. Hallstrom Construction, Inc.
No. 2001-00263-CD (Clearfield County)
Our File No.: B09926/07158

Dear Ms. Cherry:

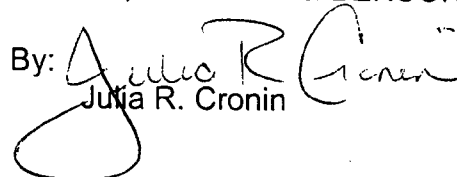
Please be advised that I am assisting Attorney Tracey Benson with the representation of Grey Investment Co., Inc. in the above-referenced matter. In review of the file, I note that we served your clients with Interrogatories and a Request for Production of Documents on or about December 4, 2001. As of this date, we have not yet received your clients' responses to same. I ask that you forward your clients' responses to the discovery requests within the next two (2) weeks.

Thank you for your attention to this matter.

Very truly yours,

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.

By:


Julia R. Cronin

JRC/lac

cc: Troy Harper, Esq.

bcc: Bridget Harriger, Best Western Inn and Conference Center
Mark Miner, Travelers Ins. Co. (Claim No. 130 LR BEI3674 J 001)

EXHIBIT B

LAW OFFICES OF
MILLER, KISTLER, CAMPBELL, MILLER, WILLIAMS & BENSON, INC.
A PROFESSIONAL CORPORATION

JOHN R. MILLER, JR.
RICHARD L. CAMPBELL
JOHN R. MILLER, III
TERRY J. WILLIAMS
TRACEY G. BENSON
SCOTT C. ETTER, Ph.D.
ELIZABETH A. DUPUIS
DAVID B. CONSIGLIO
STACY R. PARKS

PLEASE REPLY TO:
BELLEFONTE OFFICE

July 31, 2002

124 NORTH ALLEGHENY STREET
BELLEFONTE, PA. 16823-1695
(814) 355-5474
GENERAL FAX (814) 355-5340
REAL ESTATE FAX (814) 357-0264
AND
720 SOUTH ATHERTON STREET
STATE COLLEGE, PA. 16801-4628
(814) 234-1500
FAX (814) 234-1549

COUNSEL TO THE FIRM
ROBERT K. KISTLER

Toni M. Cherry, Esquire
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

**Re: Brenda L. Grenier and Edmund A. Grenier, Jr., husband and wife, v.
Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference
Center, et al. - Civil Action No. 2001-00253-CD (Clearfield County, PA)**

Dear Ms. Cherry:

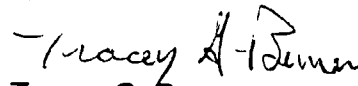
As you know, you were served with Interrogatories and a Request for Production of Documents on behalf of Defendant Gray Investment Co., Inc. on or about December 4, 2001. To-date, we have not received responses to that discovery, although I do acknowledge receiving your response to Halstrom Construction's Request for Production of Documents, along with documents produced therewith. We would like to proceed with scheduling depositions of your clients, but cannot do so until we have your interrogatory answers, and a formal response to our Request for Production of Documents. I note that by letter of March 21, 2002 Attorney Cronin from this office requested responses to the outstanding discovery.

If we do not receive formal responses to our interrogatories and the document requests propounded on behalf of Defendant Gray Investment Co., Inc. we will have no recourse but to file a motion to compel with the Court. Please provide me with Plaintiff's Responses by August 9, 2002 so that this will not be necessary.

Very Truly Yours,

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.

By:


Tracey G. Benson

TGB/krk

cc: Troy Harper, Esquire


Julia R. Cronin, Esquire

FILED

11:27:01
OCT 23 2002

NO
CC
E
KPS

William A. Shaw
Prothonotary

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

BRENDA L. GRENIER and	)	
EDMUND A. GRENIER, JR.,	)	
Husband and Wife,	)	
	)	No. 2001-263 C.D.
Plaintiffs	)	
	)	
vs.	)	
	)	
GRAY INVESTMENT CO., INC.,	)	
t/d/b/a BEST WESTERN INN &	)	
CONFERENCE CENTER,	)	
	)	
Defendant	)	
	)	
vs.	)	
	)	
HALLSTROM CONSTRUCTION, INC.,	)	
Additional Defendant	)	

ORDER

NOW THIS _____ day of _____, 2002, upon consideration of the Motion to Compel filed by Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, the Court does hereby ORDER, DIRECT and DECREE that the Plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., must provide full and complete responses, without objections, to the Defendant's First Set of Interrogatories and Request for Production of Documents Directed to Plaintiffs within fifteen (15) days of this date or be barred from producing at trial any and all evidence requested in such discovery.

BY THE COURT:

J.

J.

FILED

of 2:0781

OCT 31 2002

Att. Cronin



William A. Shaw
Prothonotary

William A. Shaw
Prothonotary

Member, Pennsylvania Association of Notaries

FILED

NOV 12 2002

William A. Shaw
Prothonotary

nc
cc

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10

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

No. 2001-263 C.D.

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

ORDER

NOW THIS 25 day of Nov, 2002, upon consideration

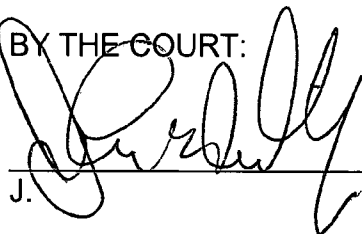
of the Motion to Compel filed by Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, the Court does hereby ORDER, DIRECT and DECREE that the Plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., must provide full and complete responses, without objections, to the Defendant's First Set of Interrogatories and Request for Production of Documents Directed to Plaintiffs within twenty (20) days of this date or be barred from producing at trial any and all evidence requested in such discovery.

FILED

NOV 25 2002

William A. Shaw
Clerk

BY THE COURT:

J. 

FILED

NOV 25 2002

0/10:30 a.m.
William A. Shaw
Physician/Secretary

1 cc to *att*
GR

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant :

:
:
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:
: No. 2001 - 263-CD

FILED
m/10:23 12/17/02
DEC 17 2002
William A. Shaw
Prothonotary

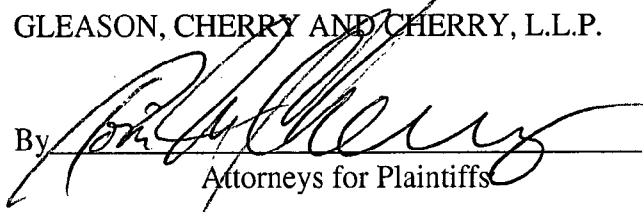
CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of December, 2002, Plaintiffs' Answers to Defendant's First Set of Interrogatories were sent to the following persons by mailing the same to them by United States First Class Mail, postage prepaid, by depositing the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

JULIA R. CRONIN, ESQ.
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823-1695

TROY J. HARPER, ESQ.
Dennison, Dennison & Harper
Attorneys at Law
293 Main Street
Brookville, PA 15825-1291

GLEASON, CHERRY AND CHERRY, L.L.P.

By 
Attorneys for Plaintiffs

Dated: December 16, 2002

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAY 14 2003

12:30 PM
William A. Shaw
Prothonotary

No c/f

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

* Civil Action Law

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* Number 2001 - 263

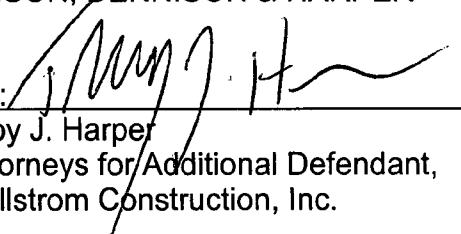
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, June 25, 2003, at 10:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: May 13, 2003

By: 

Troy J. Harper

Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of May, 2003, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By:



Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

MEMORANDUM FOR THE RECORD
DATE: 10/10/02

SUBJECT: [Illegible]

1. [Illegible]

2. [Illegible]

3. [Illegible]

4. [Illegible]

5. [Illegible]

FILED

MAY 14 2003

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAY 14 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

* Civil Action Law

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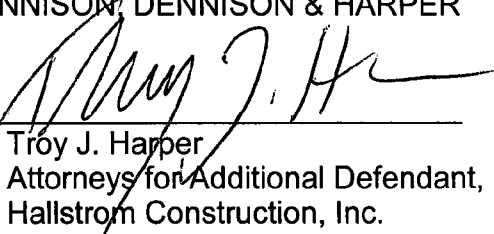
NOTICE OF DEPOSITION

TO: Edmund A. Grenier, Jr.
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **EDMUND A. GRENIER, JR.** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, June 25, 2003, at 11:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: May 13, 2003

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

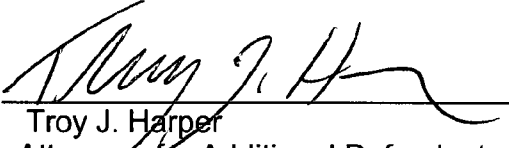
I hereby certify that on the 13th day of May, 2003, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By:


Troy J. Harper

Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

FILED

MAY 14 2003

W/12:30/hs
William A. Shaw
Proprietary

no c/c

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAY 27 2003

William A. Shaw
Prothonotary

VS.

VS.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
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*
*
* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated:

Dated: 5/23/03

DENNISON DENNISON & HARPER

By


Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier

Edmund A. Grenier Jr.

Plaintiff(s)

Vs.

Gray Investment Co., Inc.

Best Western Inn & Conference Center

Hallstrom Construction, Inc.

Defendant(s)

No. 2001-00263-CD

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

TO: Dr. William Ayoub, Geisinger Medical Group, 200 Scenery Drive, State
College, PA 16801 (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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

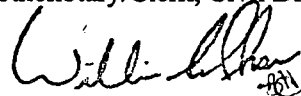
SUPREME COURT ID # 74753

ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003

Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

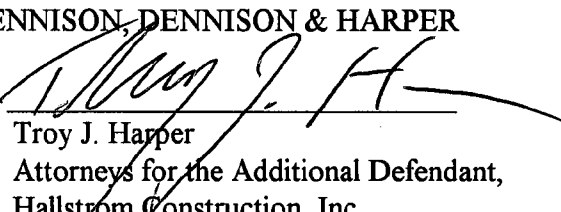
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 23rd day of May, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

FILED

MAY 24 2003

ND
cc

William A. Shaw
Prothonotary



DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAY 27 2003

William A. Shaw
Prothonotary

**BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,**

Plaintiffs,

VS.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

VS.

**HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.**

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

* **Civil Action - Law**

* Number 2001 - 263 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : BRENDA L. GRENIER and EDMUND A. GRENIER, JR.:

Hallstrom Construction, Inc., by and through its attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated:

5/23/03

DENNISON, DENNISON & HARPER

By

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier

Edmund A. Grenier Jr.

Plaintiff(s)

Vs.

Gray Investment Co., Inc.

Best Western Inn & Conference Center

Hallstrom Construction, Inc.

Defendant(s)

No. 2001-00263-CD

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

TO: Dr. Laun Hallstrom, Medical Arts Building, 145 Hospital Avenue, DuBois,
PA 15801 (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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003
Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

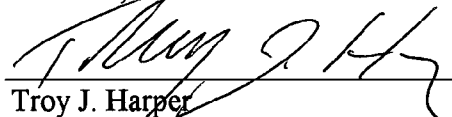
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 23rd day of May, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

FILED

MAY 27 2003

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant :

No. 2001 - 263

FILED

MAY 28 2003

William A. Shaw
Prothonotary

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May, 2003, Answers to First Set of Interrogatories Directed to Plaintiffs were sent to the following persons as follows:

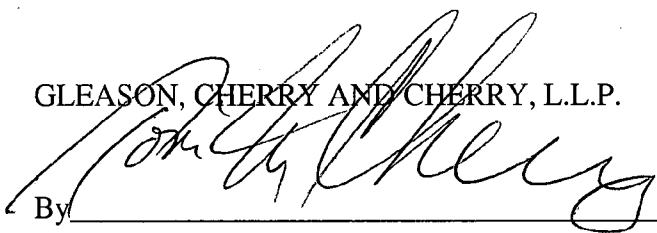
By United States First Class Mail:

JULIA R. CRONIN, ESQ.
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823-1695

By Personal Service:

TROY J. HARPER, ESQ.
Dennison, Dennison & Harper
Attorneys at Law
293 Main Street
Brookville, PA 15825

GLEASON, CHERRY AND CHERRY, L.L.P.

By 

Attorneys for Plaintiffs

Dated: May 22, 2003

FILED
MAY 28 2003
10/10:25 AM
cc

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND A.,
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO.,t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 00263 - C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 23 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
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*
* Number 2001 - 00263 - C.D.
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*

**CERTIFICATE PREREQUISITE TO SERVICE OF A
SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant certifies the following pursuant to
Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

Date: 6/20/03

By Troy J. Harper
Troy J. Harper,
Attorneys for the Defendant,
Hallstrom Construction, Inc.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

VS.

VS.

[illegible]

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier
Edmund A. Grenier Jr.
Plaintiff(s)

Vs.

Gray Investment Co., Inc.
Best Western Inn & Conference Center
Hallstrom Construction, Inc.
Defendant(s)

No. 2001-00263-CD

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

TO: Dr. Laun Hallstrom, Medical Arts Building, 145 Hospital Avenue, DuBois,
PA 15801
(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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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.

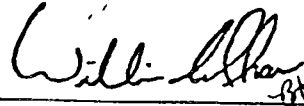
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003
Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

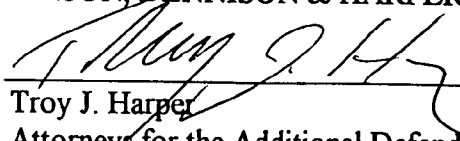
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 23rd day of May, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

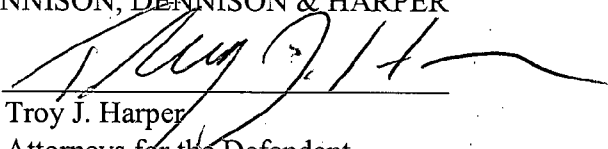
I certify that a true and correct copy of the Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 20th day of June, 2003, by United States Mail, First Class, Postage Prepaid addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellfonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant,
Hallstrom Construction, Inc.

FILED
JUN 23 2003
M 11 09 AM
cc
[Signature]

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND A.,
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO.,t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 00263 - C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 23 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Action - Law
*

* Number 2001 - 00263 - C.D.
*
*
*
*
*

**CERTIFICATE PREREQUISITE TO SERVICE OF A
SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant certifies the following pursuant to
Pa.R.C.P. 4009.22:

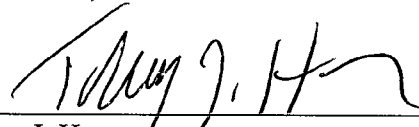
1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

Date: 6/20/03

By


Troy J. Harper,
Attorneys for the Defendant,
Hallstrom Construction, Inc.

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

**BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,**

Plaintiffs,

vs.

**GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,**

Defendant,

vs.

**HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.**

CIVIL ACTION - LAW

Number 2001 - 263 C.D.

Type of Case: Civil Division

**Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21**

**Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.**

Counsel of Record for this Party:

**Troy J. Harper
Supreme Court Number: 74753**

**John C. Dennison, II
Supreme Court Number: 29408**

**DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316**

VS.

VS.

[illegible]

Troy J. Harper,
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier
Edmund A. Grenier Jr.
Plaintiff(s)

*

Vs.

*

No. 2001-00263-CD

*

Gray Investment Co., Inc.
Best Western Inn & Conference Center
Hallstrom Construction, Inc.
Defendant(s)

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

TO: Dr. William Ayoub, Geisinger Medical Group, 200 Scenery Drive, State
College, PA 16801 (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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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.

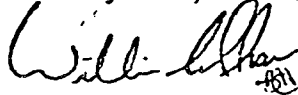
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003
Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

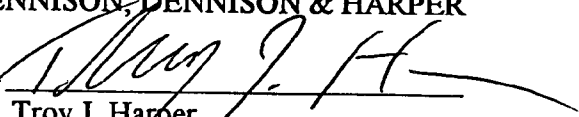
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 23rd day of May, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Additional Defendant,
Hallstrom Construction, Inc.

CERTIFICATE OF SERVICE

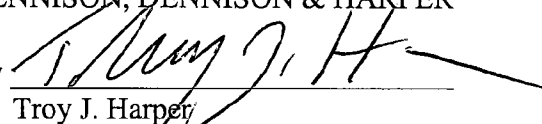
I certify that a true and correct copy of the Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 20th day of June, 2003, by United States Mail, First Class, Postage Prepaid addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellfonte, Pennsylvania 16823

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant,
Hallstrom Construction, Inc.

FILED
m 11:09 AM
JUN 23 2003
cc

William A. Shaw
Prothonetary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 00263 - C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 23 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

*

* Civil Action - Law

*

*

*

*

* Number 2001 - 00263 - C.D.

*

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*

*

*

NOTICE OF DEPOSITION FOR THE PURPOSE OF COPYING RECORDS ONLY

**TO: Dr. Laun Hallstrom,
Medical Arts Building
145 Hospital Avenue,
DuBois, Pennsylvania 15801**

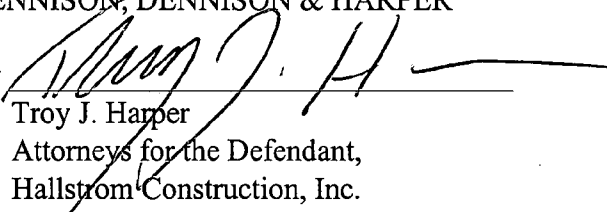
PLEASE TAKE NOTE that the Defendant will take the deposition of the Dr. Laun Hallstrom, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of the entire medical records file and/or physical therapy file in his/her possession for any medical treatment and/or medical care and/or physical therapy rendered to Brenda Grenier, S.S.N. 225-98-0052, date of birth: 01/17/59, and such other documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING
IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE/SHE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.**

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier

Edmund A. Grenier Jr.

Plaintiff(s)

Vs.

Gray Investment Co., Inc.

Best Western Inn & Conference Center

Hallstrom Construction, Inc.

Defendant(s)

No. 2001-00263-CD

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

TO: Dr. Laun Hallstrom, Medical Arts Building, 145 Hospital Avenue, DuBois,
PA 15801 (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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

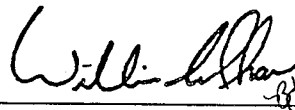
SUPREME COURT ID # 74753

ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003

Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of foregoing Notice of Deposition was served on the
20th day of June, 2003, by United States Mail, First Class, Postage

Prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

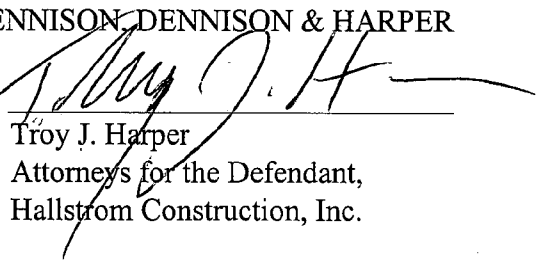
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Laun Hallstrom,
Medical Arts Building
145 Hospital Avenue,
DuBois, Pennsylvania 15801

DENNISON DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant,
Hallstrom Construction, Inc.

FILED

M 11:09 AM
JUN 23 2003

NO
CC
~~CC~~

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 00263 - C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Additional Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 23 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and EDMUND A.
GRENIER, JR., husband and wife,
Plaintiffs,

vs.

GRAY INVESTMENT CO., t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Original Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

*

* Civil Action - Law

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* Number 2001 - 00263 - C.D.

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NOTICE OF DEPOSITION FOR THE PURPOSE OF COPYING RECORDS ONLY

**TO: Dr. William Ayoub,
Geisinger Medical Group
200 Scenery Drive,
State College, Pennsylvania 16801**

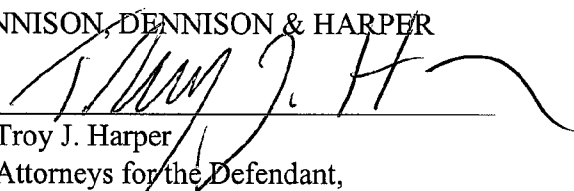
PLEASE TAKE NOTE that the Defendant will take the deposition of the Dr. William Ayoub, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of the entire medical records file and/or physical therapy file in his/her possession for any medical treatment and/or medical care and/or physical therapy rendered to Brenda Grenier, S.S.N. 225-98-0052, date of birth: 01/17/59, and such other documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING
IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE/SHE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.**

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant,
Hallstrom Construction, Inc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Brenda L. Grenier
Edmund A. Grenier Jr.
Plaintiff(s)

*

Vs.

*

No. 2001-00263-CD

Gray Investment Co., Inc.
Best Western Inn & Conference Center
Hallstrom Construction, Inc.
Defendant(s)

*

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

TO: Dr. William Ayoub, Geisinger Medical Group, 200 Scenery Drive, State
College, PA 16801 (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

at Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(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.

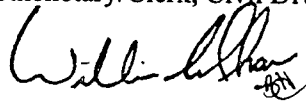
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Hallstrom Construction,
Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, May 12, 2003
Seal of the Court

Any and all medical records in your possession for Brenda Grenier, DOB: 1/17/1959, SSN: 225-98-0052, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of foregoing Notice of Deposition was served on the
20th day of June, 2003, by United States Mail, First Class, Postage

Prepaid, addressed to the following:

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

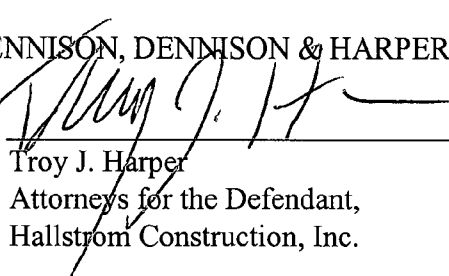
Tracey G. Benson, Esq.
Miller, Kistler, Campbell, Miller,
Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, Pennsylvania 16823

and by Certified Mail, Return Receipt Requested, on the following:

Dr. William Ayoub,
Geisinger Medical Group
200 Scenery Drive,
State College, Pennsylvania 16801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant,
Hallstrom Construction, Inc.

FILED

M/1:09-001
JUN 23 2003

no cc
ES

William A. Shaw
Proprietary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 24 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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* Number 2001 - 263

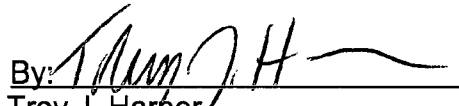
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, September 8, 2003, at 10:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: June 23, 2003

By: 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

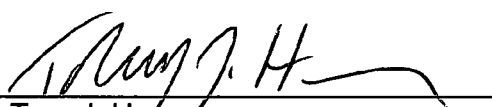
CERTIFICATE OF SERVICE

I hereby certify that on the 23 day of June, 2003, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

FILED

M 11 55 AM
JUN 24 2003

William A. Shaw
Prothonotary

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DENNISON, DENNISON & HARPER
ATTORNEYS AT LAW
293 MAIN STREET
BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

JUN 24 2003

William A. Shaw
Prothonotary

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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NOTICE OF DEPOSITION

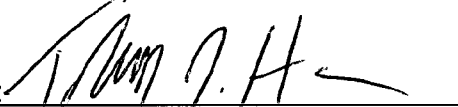
TO: Edmund A. Grenier, Jr.
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **EDMUND A. GRENIER, JR.** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, September 8, 2003, at 11:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: June 23, 2003

By:



Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

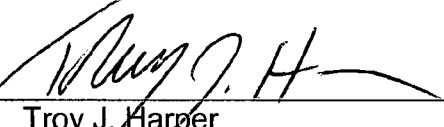
CERTIFICATE OF SERVICE

I hereby certify that on the 23 day of June, 2003, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

FILED

NO
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JUN 24 2003

William A. Shaw
Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
SEP 19 2003
m/1:30
William A. Shaw
Prothonotary/Clerk of Courts
LW C5nc.

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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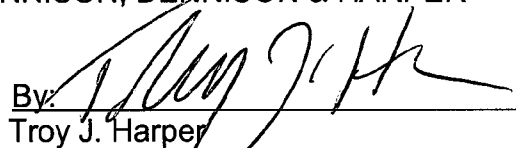
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, December 3, 2003, at 10:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: September 18, 2003

By: 

Troy J. Harper

Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

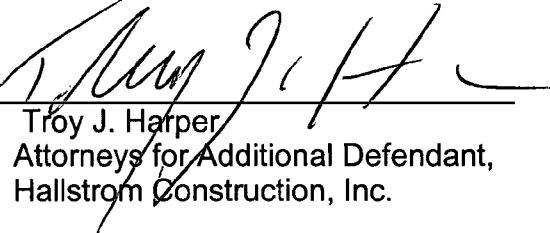
CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September, 2003, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

SEP 19 2003

M/L-30/um
William A. Shaw

Prothonotary/Clerk of Courts

NO CFM

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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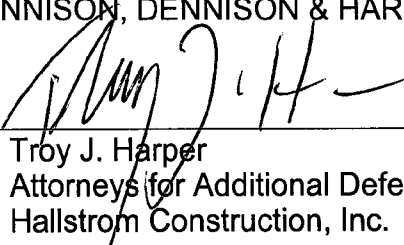
NOTICE OF DEPOSITION

TO: Edmund A. Grenier, Jr.
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **EDMUND A. GRENIER, JR.** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, December 3, 2003, at 11:30 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: September 18, 2003

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

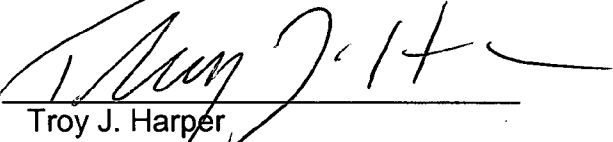
CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September, 2003, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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AUG 19 2004 ~~10~~

William A. Shaw
Prothonotary/Clerk of Courts

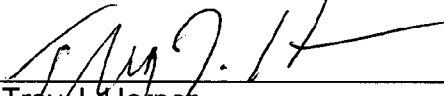
CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August, 2004, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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AUG 19 2004 ¹⁰

William A. Shaw
Prothonotary/Clerk of Courts

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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* Number 2001 - 263

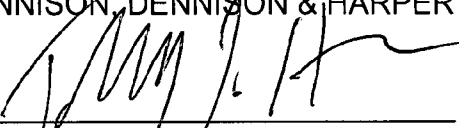
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Tuesday, September 14, 2004, at 10:00 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: August 18, 2004

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

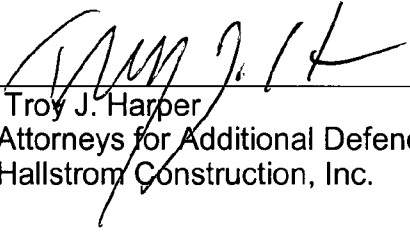
CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August, 2004, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

SEP 17 2004

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William A. Shaw

Prothonotary/Clerk of Courts

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EOK

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

* Civil Action Law

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* Number 2001 - 263

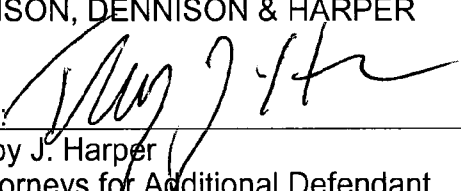
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Friday, November 12, 2004, at 10:00 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: September 16, 2004

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

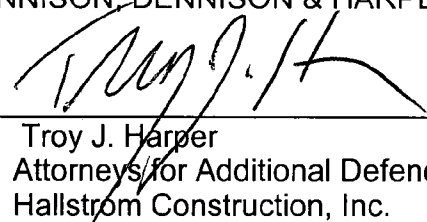
CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2004, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *E6K*

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William A. Shaw
Prothonotary/Clerk of Courts
W. C/C

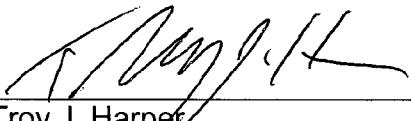
CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2004, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 
Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Brenda L.
Grenier

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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William A. Shaw
Prothonotary/Clerk of Courts

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action Law

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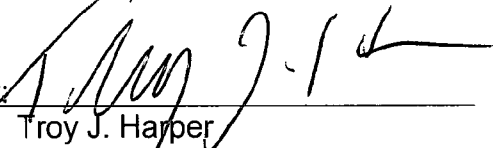
NOTICE OF DEPOSITION

TO: Brenda L. Grenier
c/o Toni M. Cherry, Esq.
GLEASON, CHERRY & CHERRY, L.L.P.
One North Franklin Street, PO Box 505
DuBois, PA 15801

Take notice that the deposition of **BRENDA L. GRENIER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, November 10, 2004, at 10:00 a.m., at the law offices of GLEASON, CHERRY & CHERRY, One North Franklin Street, DuBois, Pennsylvania 15801. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: October 12, 2004

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

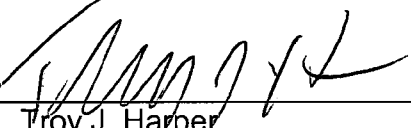
CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October, 2004, a true and correct copy of the foregoing Notice of Deposition for Brenda L. Grenier was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,

Plaintiffs,

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant,

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION - LAW

Number 2001 - 263 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Edmund A.
Grenier, Jr.

Filed on behalf of: Additional Defendant,
Hallstrom Construction, Inc.

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m/b:5461
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William A. St. John
Prothonotary/Clerk of Courts

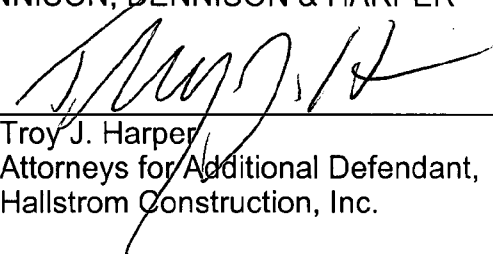
CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October, 2004, a true and correct copy of the foregoing Notice of Deposition for Edmund A. Grenier, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

Toni M. Cherry, Esquire
GLEASON, CHERRY & CHERRY, LLP
One North Franklin Street
PO Box 505
DuBois, PA 15801
(Attorney for Plaintiffs)

Julia R. Cronin, Esquire
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
124 North Allegheny Street
Bellefonte, PA 16823-1695
(Attorney for Defendant)

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Additional Defendant,
Hallstrom Construction, Inc.

CA

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

No. 2001-263 C.D.

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

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William A. Shaw
Prothonotary/Clerk of Courts

RULE TO SHOW CAUSE

NOW THIS 21ST day of JUNE, 2005, upon
consideration of Defendants' Motion to Compel, a Rule is hereby issued upon Plaintiffs
to show cause why said Motion should not be granted. This rule is returnable for
argument on the 2nd day of July, 2005 at 10:00 o'clock A.m. in
Courtroom # 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

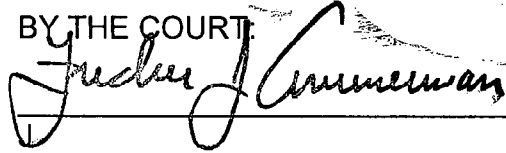
NOTICE

A PETITION OR MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF
YOU WISH TO DEFEND AGAINST THE CLAIM SET FORTH IN THE FOLLOWING
OTION FOR SANCTIONS BY ENTERING A WRITTEN APPEARANCE PERSONALLY
OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES
OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE
WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT
YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT
WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PETITIONER OR
MOVANT. YOU MAY LOSE RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator
Clearfield County Courthouse
Second and Market Streets
Clearfield, PA 16830
(814) 765-2641, Ext. 1300 Or 1301

BY THE COURT:

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

FILED

JUN 21 2005

William A. Shaw
Prothonotary/Clerk of Courts

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

BRENDA L. GRENIER and	)	
EDMUND A. GRENIER, JR.,	)	
Husband and Wife,	)	
	)	No. 2001-263 C.D.
Plaintiffs	)	
	)	
vs.	)	
	)	
GRAY INVESTMENT CO., INC.,	)	
t/d/b/a BEST WESTERN INN &	)	
CONFERENCE CENTER,	)	
	)	
Defendant	)	
	)	
vs.	)	
	)	
HALLSTROM CONSTRUCTION, INC.,	)	
Additional Defendant	)	

ORDER OF COURT

NOW THIS _____ day of _____, 2005, upon consideration of the Motion to Compel filed by Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, the Court does hereby ORDER, DIRECT and DECREE that the Plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., husband and wife, shall:

1. produce current addresses and telephone numbers for Jody Joiner and Denise Montini within twenty (20) days of the date of this Order or be barred from presenting any testimony from Jody Joiner and Denise Montini at trial;
2. produce any and all documents which support Plaintiff Edmund Grenier's claim for lost sales within twenty (20) days of the date of this Order or be barred from making a claim for lost sales at trial; and

3. produce written confirmation of any and all liens by Plaintiffs' health insurance carrier and documentation of the amount of said lien(s) within twenty (20) days of the date of this Order or be barred from presenting a claim for medical expenses at trial.

BY THE COURT:

J.

CA

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

)
)
)
) No. 2001-263 C.D.
)
) **Type of Pleading:** Motion to Compel
)
)
) **Filed on Behalf of:** Defendant Gray
) Investment Co., Inc. t/d/b/a Best
) Western Conference Center
)
) **Counsel of Record for this Party:**
)
) Tracey G. Benson, Esq.
) Julia R. Cronin, Esq.
) Miller, Kistler, Campbell, Miller,
) Williams & Benson, Inc.
) 124 N. Allegheny Street
) Bellefonte, PA 16823
) 814-355-5474

FILED *icc*
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JUN 20 2005 *Any Cronin* (X)

William A. Shaw
Prothonotary/Clerk of Courts

1. This action was commenced by Plaintiffs' filing of a Praeceptum for Writ of Summons on or about February 23, 2001.
2. Pursuant to a Rule issued upon Praeceptum of Defendant Gray Investment Co., Plaintiffs filed a Complaint on or about May 16, 2001.
3. Plaintiffs' Complaint alleges that on or about February 28, 1999, Plaintiff-Wife slipped and fell due to an accumulation of water upon the grate in the entryway of the Best Western Inn & Conference Center, resulting in serious and possibly permanent injury to her knees, left leg, left ankle and hips.

IDENTIFYING INFORMATION FOR WITNESSES

4. The averments set forth in paragraphs 1 through 3 above are incorporated herein by reference thereto as though the same were set forth at length.

5. On or about December 4, 2001, Defendant Gray Investment Co., by and through its counsel, served Interrogatories and a Request for Production of Documents upon Plaintiffs. (A copy of the Interrogatories (with Plaintiffs' typed answers) is attached hereto as Exhibit "A." A copy of the Request for Production of Documents is attached hereto as Exhibit "B").

6. In Interrogatory No. 8, this Defendant asked Plaintiffs to identify all people who witnessed the subject incident. Plaintiffs responded "see statement from Brenda Grenier previously supplied in Answer to Request for Production of Documents." (See Exhibit "A").

7. In Interrogatory No. 9, this Defendant asked Plaintiffs to identify each person who has or claims to have knowledge or information regarding any facts, circumstances or issues involved in this lawsuit or the subject incident. Plaintiffs responded "see answer to paragraph 8." (See Exhibit "A").

8. In the statement from Brenda Grenier referenced in Plaintiffs' Answers to Interrogatories Nos. 8 and 9, Plaintiffs identified the following individuals as witnesses to the accident:

Jody Joiner
1578 Treasure Lake
DuBois, PA 15801
Ph. #814-375-4197

Denise Montini
42 East Scribner Ave.
DuBois, PA 15801
Ph. #814-371-2808

(A copy of the statement from Brenda Grenier is attached hereto as Exhibit "C").

9. The definitions on page 2 of the Interrogatories define "identify" when used with respect to a person as "the full name and present or last known residence and business or permanent address of such person..." (See attached Exhibit "A").

10. During her deposition on November 10, 2004, Plaintiff Brenda Grenier again stated that Jody Joiner and Denise Montini witnessed the subject fall. (See Deposition of Brenda Grenier, T.P. 30-33, attached hereto as Exhibit "D").

11. Following the Plaintiffs' depositions, counsel for this Defendant attempted to contact Jody Joiner and Denise Montini using the identifying information provided by Plaintiffs, but found that the addresses and telephone numbers provided by Plaintiffs were incorrect. Defendant's counsel has been unsuccessful in locating the whereabouts of Ms. Joiner and Ms. Montini using various search methods.

12. By letter dated January 5, 2005, this Defendant's counsel asked Plaintiffs' counsel to schedule the depositions of Jody Joiner and Denise Montini. (A copy of said letter dated January 5, 2005 is attached hereto as Exhibit "E").

13. Having received no response to her letter of January 5, 2005, this Defendant's counsel again wrote Plaintiffs' counsel on March 2, 2005, asking that the Plaintiffs provide current information as to Jody Joiner and Denise Montini's whereabouts so that their depositions could be taken. (A copy of said letter dated March 2, 2005 is attached hereto as Exhibit "F").

14. As of this date, Plaintiffs have not provided this Defendant or its counsel with accurate identifying information for Jody Joiner or Denise Montini so that they can be deposed concerning their knowledge of the subject accident.

WHEREFORE, Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center requests that this Honorable Court compel Plaintiffs to provide current addresses and telephone numbers for Jody Joiner and Denise Montini within twenty (20) days or be barred from presenting any testimony from Jody Joiner and Denise Montini at trial.

DOCUMENTS PERTAINING TO LOST SALES CLAIM

15. The averments set forth in paragraphs 1 through 14 above are incorporated herein by reference thereto as though the same were set forth at length.

16. In Request No. 9 of the Request for Production of Documents, this Defendant asked Plaintiffs to produce "any and all documents that you intend to rely upon in support of any allegations complained of in the Complaint, including any documents that you contend support any damages that you are claiming in this lawsuit." (See Exhibit "B").

17. During his deposition, Plaintiff Edmund Grenier, a self-employed owner of two memorial parks, testified that due to his wife's injuries, he lost sales volume of 20% to 25% for about a year and a half, amounting to about \$60,000.00. (See Deposition of Edmund Grenier, T.P. 30-35 and 43, attached hereto as Exhibit "G").

18. As of this date, Plaintiffs have not provided any documentation to support Plaintiff Edmund Grenier's claim of lost sales.

19. Such documentation was requested at Request No. 9 of this Defendant's Request for Production of Documents.

20. Furthermore, during Mr. Grenier's deposition, counsel for Defendant Hallstrom Construction, Inc. requested that Mr. Grenier produce his CPA financial records which Mr. Grenier testified would document his lost sales. (See Deposition of Edmund Grenier, T.P. 34, l. 17 – t.p. 35, l. 5, attached hereto as Exhibit "G").

21. By letter to Plaintiffs' counsel dated February 9, 2005, counsel for Defendant Hallstrom Construction, Inc. again asked Plaintiffs to produce "the financial information from Grenier Enterprises that Mr. Grenier was relying on in making his lost sales claim as he testified during his deposition." (A copy of said letter dated February 9, 2005 is attached hereto as Exhibit "H").

22. By letter to Plaintiffs' counsel dated March 2, 2005, this Defendant's counsel asked Plaintiffs to produce the documentation Plaintiffs are relying on in support of Mr. Grenier's claim of lost sales/business income as a result of Mrs. Grenier's injuries. (A copy of said letter dated March 2, 2005 is attached as Exhibit "F").

23. As of this date, Plaintiffs have not produced any documentation to support Mr. Grenier's claim for lost sales.

WHEREFORE, Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center requests that this Honorable Court compel Plaintiffs to produce any and all documentation which supports Plaintiff Edmund Grenier's claim for lost sales within twenty (20) days or be prohibited from making a claim for lost sales at the time of trial.

INFORMATION PERTAINING TO LIEN FOR MEDICAL EXPENSES

24. The averments set forth in paragraphs 1 through 23 above are incorporated herein by reference thereto as though the same were set forth at length.

25 In Request No. 16 of the Request for Production of Documents, this Defendant asked Plaintiffs to produce copies of any and all correspondence or notices of subrogation received by Plaintiffs asserted by any insurance carrier or healthcare provider in connection with care rendered in response to injuries allegedly sustained in the subject accident. (See Exhibit "B").

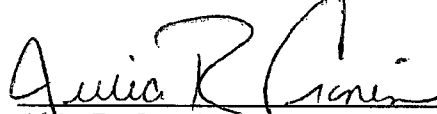
26. During his deposition, Plaintiff Edmund Grenier testified that he and his wife received letters from an entity trying to collect on behalf of Geisinger for medical bills paid for treatment rendered to Brenda Grenier as a result of the subject accident. (See Deposition of Edmund Grenier, T.P. 29-30, attached hereto as Exhibit "G").

27. In his letter to Plaintiffs' counsel dated February 9, 2005, counsel for Defendant Hallstrom Construction, Inc. requested that Plaintiffs provide defense counsel with written confirmation of the lien from Mrs. Grenier's health insurance carrier and the amount of same. (See Exhibit "H").

28. In her letter to Plaintiffs' counsel dated March 2, 2005, counsel for this Defendant again requested documentation concerning the existence and amount of the lien for medical expenses paid by Mrs. Grenier's health insurance carrier. (See Exhibit "F").

29. As of this date, Plaintiffs have not produced any evidence of a lien for medical expenses or the amount of same.

WHEREFORE, Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center requests that this Honorable Court compel Plaintiffs to produce written confirmation of any and all liens by Plaintiff Brenda Grenier's health insurance carrier(s) and documentation concerning the amount of such liens within twenty (20) days or be barred from presenting a claim for medical expenses at trial.



Julia R. Cronin, Esquire

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 N. Allegheny Street
Bellefonte, PA 16823
814-355-5474

Counsel for Defendant Gray Investment
Co., Inc. t/d/b/a Best Western Inn &
Conference Center

Dated: 6/17/05

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

: No. 2001 - 263 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading: PLAINTIFFS' ANSWERS
: TO DEFENDANT'S FIRST SET OF
: INTERROGATORIES
:
: Filed on Behalf of: BRENDA L. GRENIER and
: EDMUND A. GRENIER, JR., Husband and
: Wife, Plaintiffs
:
: Counsel of Record for these Parties:
:
: TONI M. CHERRY, ESQ.
: Supreme Court No.: 30205
:
: GLEASON, CHERRY AND
: CHERRY, L.L.P.
: Attorneys at Law
: P. O. Box 505
: One North Franklin Street
: DuBois, PA 15801
:
: (814) 371-5800

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO. 2001-263-CD

**DEFENDANT GRAY INVESTMENT CO., INC. T/D/B/A BEST WESTERN INN &
CONFERENCE CENTER'S FIRST SET OF INTERROGATORIES TO PLAINTIFFS**

Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, by its counsel, Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., hereby requests that Plaintiffs Brenda L. Grenier and Edmund A. Grenier, Jr., answer the interrogatories listed below within thirty (30) days of service hereof under oath and in writing in accordance with Rule 4006 of the Pennsylvania Rules of Civil Procedure.

These interrogatories shall be deemed to be continuing in nature so as to require seasonal supplemental answers if plaintiffs obtains further information subsequent to the time their answers are served and filed.

I. DEFINITIONS

A. The word "person" means any entity and includes, but is not limited to, any natural person, joint owner, association, company, partnership, joint venture, corporation, trust or estate.

B. The word "document" means any written, printed, recorded or graphic matter, photographic, film or videotaped matter or sound reproductions, however produced or reproduced, pertaining in any manner to the subject matter indicated, including all copies thereof.

C. The words "identify," "identity," and "identification" when used with respect to a person means to state the full name and present or last known residence and business or permanent address of such person, and, if a natural person, his present or last known job title, and the name and address of his present or last known employer.

D. The words "identify," "identity," and "identification" when used with respect to a document means to describe the document by date, subject matter, the name of each person who wrote, signed, initialed, dictated or otherwise participated in the preparation of same, the name and address of each addressee (if any) and the name and address of each person who has possession, custody or control of such document.

E. The words "identify," "identity," and "identification" when used with respect to an act, occurrence, statement or conduct, including an alleged violation or

breach (hereinafter collectively called an "act"), mean to: (1) describe the substance of each event constituting such act and to state the date when such act occurred; (2) identify each person participating in such act; (3) identify each person present when such act occurred; (4) state whether the occurrence of such act was recorded or described in a document; (5) state whether such document, or a copy thereof, now exists; and (6) identify the person presently having possession, custody or control of each such document.

F. The words "you" or "your" or "plaintiffs" mean or refer to Brenda L. Grenier and Edmund A. Grenier, Jr., as appropriate, parties herein, their employees, agents, representatives, accountants, and attorneys.

G. The word "Defendant" mean or refers to Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, as may be appropriate, party to this action, its employees, agents, representatives, accountants, and attorneys.

H. The word "incident" means and refers to the events described in the Complaint, leading or relating to the injuries allegedly sustained by wife-plaintiff on or about February 28, 1999.

II. INTERROGATORIES

1. Please provide the following information with respect to Brenda L. Grenier's background:

- (a) Height and weight immediately before this incident and at the present time;
- (b) Whether you are or have ever been married and, if so, the identity of your spouse;
- (c) Your maiden name;
- (d) Any married or other names used by your, and the period of time during which any such names were used by your;
- (e) Your social security number;
- (f) Your present address;
- (g) Each address of your residences for the past ten years;
- (h) Your present employer;
- (i) Your present job title;
- (j) Your present rate of pay; and
- (k) The identity of each employer during the past five years and, with respect to each, your job description and rate of pay.

ANSWER:

- (a) before: Approximately 180 pounds; now: 248 pounds; 5' 8"
- (b) Yes, Edmund A. Grenier, Jr.
- (c) Daniels
- (d) None
- (e) 225-98-0052
- (f) R. R. 4, Box 603, DuBois, PA 15801
- (g) R. R. 4, Box 229, DuBois, PA 15801
- (h) self-employed
- (i) Secretary-Treasurer
- (j) Salary: \$600.00 per week; \$480.00 after taxes
- (k) self-employed

2. Please state whether Brenda L. Grenier or Edmund A. Grenier, Jr. have ever filed or made a formal or an informal claim or proceeding for an industrial accident or any injury (whether or not work-related) prior or subsequent to the incident, and, if so, please state the following:

(a) The circumstances, nature and extent of each accident and injury;

(b) The identity of each employer and each examining, consulting or treating physician or limited medical practitioner;

(c) The identity of each superior, officer, court, board, or tribunal before which or to whom each claim has been made or filed, the date on which each such claim has been made or filed and the file number of each case, if any;

(d) The amount and date of each award and payment, and;

(e) Whether you now have or had, prior to the incident, any disability as a result of such injury or disability, and, if so, please describe.

ANSWER: See Answer to Question 3. herein.

3. Please state whether Brenda L. Grenier and/or Edmund A. Grenier, Jr. have ever been a party to any other litigation or legal proceeding, and, if so, please state the following:

- (a) The nature of the litigation or proceeding;
- (b) The date, court, tribunal, and place where the litigation or proceeding was filed or commenced;
- (c) The identity of all plaintiffs, defendants, other parties, and their attorneys;
- (d) The present status of each litigation or proceeding; and
- (e) If concluded, the result of each litigation or proceeding.

ANSWER:

- (a) February 1, 1989 automobile accident - passenger in vehicle
- (b) Clearfield County
- (c) Our attorney, Querino Torretti, Esq.
Other's attorney - ?
- (d) Settled out of court. Injury was to jaw and neck strain; fully recovered; aggravated pre-existing TMJ problem. Total was \$10,000.00.

4. Please state the business or occupation of Brenda L. Grenier during the ten (10) years preceding the incident, and please state the following with regard to such business:

(a) The identity of each of her employers, the dates of employment for each, and a description of the work performed for each employer;

(b) Whether a physical examination was required for any of the employers;

(c) If your response to the preceding subinterrogatory is affirmative, the date, place, and identity of the person giving such physical examination;

(d) The identity of her immediate foreman, supervisor, or other person to whom she was responsible at the time of the incident;

(e) Her rate of pay or compensation at the time of the incident and for the year immediately prior thereto; and

(f) Her total income for each of the ten (10) years preceding this incident.

ANSWER: (a) self-employed

(b) No.

(c) n/a

(d) n/a

(e) salary

(f) See Income Tax Returns previously supplied in response to Request for Production of Documents.

5. If Brenda L. Grenier has been employed since the incident, please state the following:

- (a) The identity of her present employer;
- (b) The title or position being held and nature of work being performed;
- (c) The average number of hours she worked per week;
- (d) Her present weekly wages, earnings, income or profit;
- (e) The identity of her immediate foreman or other superior to whom she is responsible; and
- (f) Whether a physical examination was required;
- (g) If her response to the preceding subinterrogatory is affirmative, the date, place, and person giving the examination.

ANSWER:

- (a) self-employed; Grenier Enterprises, Inc.
- (b) Secretary-Treasurer; Office Manager
- (c) 10 hrs. per week
- (d) \$600.00 - officer's salary
- (e) self-employed
- (f) No.
- (g) n/a

6. Please state the business or occupation of Edmund L. Grenier, Jr. during the ten (10) years preceding the incident, and please state the following with regard to such business:

(a) The identity of each of his employers, the dates of employment for each, and a description of the work performed for each employer;

(b) Whether a physical examination was required for any of the employers;

(c) If your response to the preceding subinterrogatory is affirmative, the date, place, and identity of the person giving such physical examination;

(d) The identity of his immediate foreman, supervisor, or other person to whom he was responsible at the time of the incident;

(e) His rate of pay or compensation at the time of the incident and for the year immediately prior thereto; and

(f) His total income for each of the ten (10) years preceding this incident.

ANSWER: Edmund L. Grenier, Jr., is the primary shareholder in Grenier Enterprises, Inc. He has been employed by Grenier Enterprises, Inc., since 1990. No physical examination was required for this job. He has no immediate foreman or supervisor. His rate of pay or compensation is by commission. Total income is shown on copies of Income Tax Returns previously supplied.

7. If Edmund L. Grenier, Jr. has been employed since the incident, please state the following:

- (a) The identity of his present employer;
- (b) The title or position being held and nature of work being performed;
- (c) The average number of hours he worked per week;
- (d) His present weekly wages, earnings, income or profit;
- (e) The identity of his immediate foreman or other superior to whom he is responsible; and
- (f) Whether a physical examination was required;
- (g) If his response to the preceding subinterrogatory is affirmative, the date, place, and person giving the examination.

ANSWER: N/A. Edmund L. Grenier, Jr., was not injured in the accident. However, information concerning his income is shown on the Income Tax Returns previously supplied.

8. With respect to the incident, please state the following:

- (a) A description of the precise location where it occurred;
- (b) The identity of any persons in or near the location described in response to the preceding subpart;
- (c) The identity of all persons witnessing events leading up to the incident;
- (d) The identity of all persons who witnessed the incident; and
- (e) The identity of all persons who witnessed events following the incident.

ANSWER: See statement from Brenda Grenier previously supplied in Answers to Request for Production of Documents.

9. Please identify each person who has or claims to have knowledge or information regarding any facts, circumstances, or issues involved in this lawsuit or this incident, and, with respect to each, please state the following:

(a) Whether each has given an oral or written statement and, if so, the identity of such statement;

(b) A brief summary of the knowledge which each has or claims to have; and

(c) The identity of any documents reflecting each's statement.

[If you will do so without a formal request for production of documents, please attach all such documents to your answers.]

ANSWER: See answer to Paragraph 8.

10. Please provide the following information concerning the identity of the persons identified in response to the preceding interrogatory:

- (a) Each's full and proper name;
- (b) Each's present or last known residence address;
- (c) Each's present or last known business address;
- (d) Each's present or last known job title;
- (e) Each's job title at the time of the incident;
- (f) Each's present or last known employer;
- (g) The address of each's present or last known employer; and
- (h) Each's employer at the present time.

ANSWER: See information previously supplied through responses to Request for Production of Documents.

11. Please state whether you have a stenographic, mechanical, electrical, or other recording or transcript of any oral statement made by any person having any knowledge whatsoever concerning the above-captioned case or the incident.

ANSWER: YES.

12. If your answer to the preceding interrogatory is anything but an unqualified negative, please state the following with respect to each such person making such statements:

- (a) Whether the statement is in question and answer form or in narrative form;
- (b) Whether the person giving the statement received a copy of the same;
- (c) The method by which the statement has been preserved;
- (d) The identity of the person by whom the statement was taken; and
- (e) The identity of the person presently having custody of the notes, recordings, transcripts, and so on of such statement.

[If you will do so without a request for production, please attach a copy of such statements hereto.]

ANSWER: Statements in possession of Plaintiff have previously been supplied in Responses to Request for Production of Documents.

13. Please state whether you have given any statement (as defined by the Rules of Civil Procedure) concerning this action or its subject matter. If so, please identify:

- (a) Each person to whom a statement was given;
- (b) When and where each statement was given;
- (c) Any person who has custody of any such statements that were reduced to writing or otherwise recorded; and
- (d) Whether you will attach a copy of each such statement to these answers to interrogatories without the necessity of filing a request for production of documents.

ANSWER: YES. Statement made by Plaintiff has previously been supplied.

14. Please identify each person who you expect to call as an expert witness at the trial of this case.

ANSWER: Thomas J. Ellis, D.O.
University Orthopedics Center
101 Regent Court
State College, PA 16801

15. Please identify each individual who you expect to call as an expert witness at the time of trial with regard to the following topics:

(a) Any allegation of negligence or liability on the part of Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center;

(b) Wife-plaintiff's medical condition, diagnosis or treatment.

ANSWER: No other expert witnesses other than the doctor listed in answer to Question 14 have been identified at this time. However, as soon as the identity of any expert witness becomes known, such information will be immediately supplied.

16. As to each person named in response to the preceding interrogatories please state:

(a) The substance of each fact to which he or she is expected to testify;

(b) The substance of each opinion to which he or she is to testify;

(c) The grounds for each opinion; and

(d) The background, training, experience and other qualifications of such expert.

ANSWER: See report from Dr. Ellis provided through previous Responses to Motion for Production of Documents.

17. Please describe the medical and/or other specialty, if any, which each person identified in the answer to the preceding interrogatories possesses.

ANSWER: orthopaedic surgeon

18. Please state each and every respect in which each of the persons identified in response to the aforementioned interrogatories will contend that Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center was negligent.

ANSWER: There is no expert witness at this time to testify to this issue. However, Plaintiff has been advised that another individual had previously been hurt at the same location in the same manner and thus, Defendants were aware of a dangerous condition existing on the premises.

19. Please set forth each and every fact on which each contention listed in response to the preceding interrogatory is based, identifying the source of each such fact.

ANSWER: See Answer to Paragraph 18. The identity of that individual is known to Defendants and will be sought by Plaintiffs through discovery.

20. Please state whether you or anyone acting on your behalf knows of the existence of any photographs, motion pictures, video recordings, maps, diagrams or models of the site of the incident, the parties, or any other subject matter involved in this action.

ANSWER: Copy of photograph of the site has previously been supplied through Responses to Motion for Production of Documents.

21. Please state whether you or anyone on your behalf conducted any investigations of the incident which is the subject matter of the Complaint.

ANSWER: NO.

22. If your answer to the preceding interrogatory is anything but an unqualified negative, please state with respect to any such investigations the following information:

(a) Each person, and the employer of each person, who conducted any investigations;

(b) The dates of the investigations; and

(c) All notes, reports or other documents prepared during or as a result of the investigations and the identity of the persons who have possession thereof.

ANSWER: N/A

23. Please explain what you contend Gray Investment Co., t/d/b/a Best Western Inn & Conference Center should have done to avoid the incident or any injury to you resulting from the incident:

- ANSWER:**
1. There should have been someone on duty in this building. (The Convention Center is in a separate building from Best Western. The on-duty desk is in the main building.) while event room is rented.
 2. Water tracked into lobby and ice at entrance should be cleaned up or warning signs posted by a person on duty especially during inclement weather.
 3. No one on duty at desk in main motel building was aware of accident until much later and no one offered to call medical assistance.
 4. Floor grates are very slipperty and with large number of people tracking in water, they became more slippery in the vestibule.
 5. See allegations of negligence set forth in Paragraph 6 of the Complaint which are incorporated herein by reference.

24. With regard to the physical condition of wife-plaintiff Brenda L. Grenier, please describe any injuries which you have incurred as a result of the February 28, 1999 slip and fall accident, and state the following:

(a) A precise and full description of which injuries you claim to have sustained as a result of the incident;

(b) The identity of all physicians and surgeons who have examined, attended, or treated you or who have performed tests upon you or have diagnosed your condition or have been consulted concerning your condition since the incident;

(c) As to each person identified in the preceding subparagraph, the nature of the attention by the physicians identified in the preceding subparagraph including the symptoms which compelled you to visit each, the condition for which each physician treated you, a description of each treatment, and the dates on which you visited each physician;

(d) An indication of which of the above-mentioned physicians were consulted on the advice of your attorneys;

(e) The identity of any physicians or surgeon who has given an oral or written report to you, your attorneys, or their investigators concerning any treatment, examination, attendance, diagnosis, or conclusion about your condition since the incident as well as the date of each such report and the identity of each person now in possession or custody of each such report;

(f) The identity of the person to whom any of the above-mentioned physicians made an oral report on your condition as well as the identity of anyone present when the report was made and the substance of each report;

(g) Whether you were hospitalized at any time since the incident as a direct or indirect result of the accident and, if so, the identity of each hospital, the dates of admission thereto, and the nature of the treatment received;

(h) Whether you received treatment as an outpatient in any hospital or clinic as a result of any injuries alleged to stem from the accident, and, if so, the identity of each hospital or clinic, the dates of treatment, the nature of the treatment, and the nature of any examination;

(i) An itemization of the charges made and expenses incurred as a result of any outpatient or inpatient treatment including which charges have been paid, the dates of payment, and the identity of the person paying;

(j) Whether you had any tests made or taken in relation to the incident and, if so, the identity of the place where they were taken, the identity of the person taking them, the date of them and the nature of them;

(k) The identity of all other medical bills paid or incurred to date which are connected to any injury allegedly resulting from the incident;

(l) The identity of the physician who, at the time of the accident, was usually contacted by you or the members of your family when medical attention was desired or necessary; and

(m) Whether you have undergone any type of rehabilitation or training necessitated by or otherwise connected to any injuries stemming from the incident, and, if so, the identity of each organization, person, or facility administering the rehabilitation or training, the dates of training, a detailed description of the training, and an itemization of any charges assessed as a result of that training.

ANSWER: See statements, documents and medical records previously supplied through Responses to Request for Production of Documents. In addition, see medical records supplied through subpoenas.

25. With regard to the physical condition of wife-plaintiff Brenda L. Grenier before the incident, please state the following:

(a) Whether you ever sustained any injuries prior to the incident;

(b) If your response to the preceding subinterrogatory is anything but an unqualified negative, the nature of each such injury, the date of each such injury, the manner in which each such injury was sustained, a description of the injury, the identity of the treating physician, the dates of such treatment, and the period of time when you missed work as a result of the injury;

(c) Whether you sustained any other injuries or major illnesses during the ten years preceding the date of the slip and fall, either caused by a motor vehicle collision or otherwise; and

(d) If your response to the preceding subinterrogatory is anything but an unqualified negative, the nature of each such injury or illness, the date each such injury or illness was sustained, the inclusive dates of your disability resulting from any such injury, a description of any disability or incapacity resulting from each such injury or illness, the identity of each physician or doctor examining or the treating you in connection with each such injury or illness;

(e) Whether you have had an accident or injury for which a claim has been made against a company or in which a lawsuit has been filed; and

(f) If your response to the preceding subinterrogatory is anything but an unqualified negative, the identity of each such person against whom you made a claim, the facts upon which your claim was based, the dates, and the nature of each injury claimed by you, the identity of and dates during which you were a patient or received treatment by any physician or were confined to any hospital regarding each such injury, the amount of any compensation paid, the identity of the person paying any compensation, the present effect of any injury for which a claim was made, the dates of employment which were lost because of such injury, and the title, court, date and docket number of any legal action initiated for such claim.

ANSWER: (a) Yes, see answer to Questions 2 and 3.
(b) See answers to Questions 2 and 3
(c) No
(d) N/A
(e) See answers to Questions 2 and 3
(f) See answers to Questions 2 and 3

26. With regard to the physical condition of wife-plaintiff Brenda L. Grenier since the date of the incident, please state the following:

(a) The nature of any injury or major illness affecting your physical condition, a description of how it was sustained, the inclusive dates of any disability resulting from each such illness, and the identity of each physician or surgeon examining or treating you in connection with each such injury or illness;

(b) Whether you have sustained any injury, illness or other condition affecting any bodily or mental function after the incident which is alleged to stem from the incident, or from any disability resulting therefrom;

(c) If your response to the preceding subinterrogatory is anything but an unqualified negative, the nature of such injury, the date each such injury was sustained, the identity of the physician treating you for each such injury, the dates of such treatment, and the dates on which you missed work as a result of such injury;

(d) Whether you have had an accident or injury for which a claim has been made against a company or in which a lawsuit has been filed; and

(e) If your response to the preceding subinterrogatory is anything but an unqualified negative, the identity of each person against whom you made a claim, the facts upon which your claim was based, the dates and the nature of each injury claimed by you, the identity of and dates during which you were a patient or received treatment by any physician or were confined to any hospital regarding each such injury, the amount of any compensation paid, the identity of the person paying any compensation, the present effect of any injury for which a claim was made, the dates of employment which were lost because of such injury, and the title, court, date, and docket number of any legal action initiated for such claim.

ANSWER: On August 20, 2002, wife's ankle was bumped when someone pushed into her and her symptoms of pain increased. There was no re-injury.

(b) There was no re-injury.

(c) Dr. Ellis continues to treat Plaintiff. An updated medical report has been requested and will be submitted upon receipt.

(d) No.

(e) N/A

27. With respect to any damages incurred by Brenda L. Grenier and/or Edmund A. Grenier, Jr. as a result of this incident, please state the following:

- (a) A description of the damages incurred;
- (b) An itemization of each and every expense or outlay by you claimed as a result of any injury in this case including but not limited to the date incurred, the amount involved, the person to whom it was owed, the nature of the service performed, and the identity of the person paying it;
- (c) The dates of hospitalization, the identity of any hospitals, the identity of any admitting physician, and identity of any treating physician, and so on; and
- (d) The identity of any documents relating in any way to damages incurred by you as a result of the incident on which this action is brought.

ANSWER: (1) Blue Cross - Blue Shield; and
(2) Geisinger; and
(3) Self-paid bills

28. Please state whether wife-plaintiff Brenda L. Grenier has ever made application for and/or received health or accident insurance benefits, first party benefits, workmen's compensation payments, disability benefits, pensions, accident compensation payments or veterans' or social security or other disability compensation, benefits or awards, prior or subsequent to the incident alleged in the Complaint, and, if so, please state the following:

(a) The circumstances under which each such benefit, award or payment has been received;

(b) The amount of each such benefit, award or payment;

(c) The covering dates during which each such benefit, award or payment has been received;

(d) The identity of the agency or the insurance company which has paid each such benefit or award or has made such payment; and

(e) Whether you now have or had prior to the incident any disability as a result of such injury or disability, and, if so, please state the following:

(f) The name and description of each congenital abnormality;

(g) The area of your body affected;

(h) The date on which plaintiff first became aware of such congenital abnormality;

(i) A description of the care or treatment being rendered for same, by whom (identity), where, and the identity of the person paying for said care or treatment; and

(j) Whether you or your counsel have been placed on notice of any subrogation interest with regard to your receipt of each such benefit, award or payment;

ANSWER: No.

29. Please state whether wife-plaintiff Brenda L. Grenier has undergone any surgery or surgical procedures prior or subsequent to the incident, and, if so, please state the following:

- (a) The purpose of each such surgical operation or procedure;
- (b) The date on which each such surgical operation or procedure has been performed;
- (c) The identity of each hospital or other institution or medical facility at which each such surgical operation or procedure has been performed;
- (d) The identity of each physician or surgeon conducting said surgical operation or procedure;
- (e) Each and every operative or postoperative complication, if any, from each surgical operation or procedure and the nature of the same;
- (f) Whether future hospitalization, convalescence, or treatment will be necessary.

ANSWER:

- (a) ankle surgery
- (b) See medical records and reports previously supplied.
- (c) "
- (d) "
- (e) "
- (f) I am being treated for on-going problems and possibly more treatments and/or operations in the future.

30. Please state whether or not wife-plaintiff was confined to home or the home of another person or other place of convalescence as a result of the incident, and, if so, please state the following:

(a) The identity and relationship to plaintiff of each person where said confinement took place;

(b) The identity of each physician, other practitioner, registered or practical nurse, or any other person who treated, cared for, or attended plaintiff during the aforementioned confinement or convalescence; and

(c) The dates of the beginning and end for each of the aforementioned confinements.

ANSWER: I was confined to my home after accident and after surgery. .

31. Please state whether Brenda L. Grenier and/or Edmund A. Grenier, Jr. missed any work as a result of injuries allegedly sustained in the incident, and, if so, please state the following:

- (a) Each date on which you were absent from work;
- (b) The total number of days or hours which you allegedly lost;
- (c) Whether you have been paid by your employer or have received income from any other source during your absence; and
- (d) If your response to the preceding subinterrogatory is affirmative, the identity of the person paying it, the reason why it was paid, and the amount paid.

ANSWER: Job duties were curtailed, resulting in us employing other to do the work I was unable to do.

32. Please state whether Brenda L. Grenier and/or Edmund A. Grenier, Jr. claim an impairment of earning capacity or loss of future earnings as a result of injuries allegedly sustained in the incident by Brenda L. Grenier, and, if so, please state the following:

(a) The amount claimed as damages and the method of computing this amount; and

(b) The facts upon which such claim is based.

ANSWER: Being self-employed, we know that Brenda will not be able to sit for extended periods of time, since most of her work is managing the accounts and bookkeeping and computer work. We have moved most of this into our home and we still must employ others to "sit in" for her and to the functions which she is unable to do. She cannot sit for extended periods of time as her muscles stiffen up.

33. Please state whether you have been required to make expenditures for household help or any other service which you have not been able to perform as a result of the injuries allegedly sustained in the incident, and, if so, please state the following for each person rendering services;

- (a) The identity and telephone number;
- (b) A description of the services performed;
- (c) The inclusive dates of employment;
- (d) The hours of work per week;
- (e) An explanation why the services could not have been performed by plaintiff;
- (f) An itemization of charges for the services;
- (g) The amount of such charges paid and the identity of the person paying them;
- (h) Whether such services will be required in the future; and
- (i) If your response to the preceding subinterrogatory is affirmative, the estimated cost.

ANSWER: Employees performing services for Grenier Enterprises, Inc., are shown on Income Tax Returns previously supplied. Housekeeper performing four to five hours of work per week was paid in cash at the rate of \$10.00 per hour or \$40.00 to \$50.00 per week.

34. Please state whether you have had any other expenses or have suffered any pecuniary loss other than set forth elsewhere in your answers to these interrogatories because of the incident, and, if so, please state the following for each expense and loss:

- (a) A description of such other expenses and/or pecuniary losses;
- (b) An explanation of how the injuries necessitated the expense or caused the loss;
- (c) The total amount of the expense or loss;
- (d) The amount of each such expense and each such loss paid, including but not limited to the identity of the persons paying such expenses and losses and to whom such were paid; and
- (e) The estimated future expenses or losses.

ANSWER: Incidental - travel expenses to doctors mostly in State College.

35. Please state whether any photographs, video tapes, pictures, or snapshots have been taken of Brenda L. Grenier since the onset of the problems complained of in the Complaint, and, if so, please state the following:

(a) The dates on which such photographs were taken, the identity of persons by whom they were taken, and the identity of persons in whose possession said photographs now rest; and

(b) A description of the content of each of such photographs in detail or, in the alternative, an indication whether copies will be provided without a formal request therefore.

ANSWER: No specific photographs of Brenda Grenier were taken. She may appear in various family photographs that were previously supplied in Response to Request for Production of Documents.

36. If you have incurred any bills or expenses in connection with the injuries or diseases which you suffered because of the incident referred to in the Complaint, and such bills or expenses are not otherwise listed in answer to these interrogatories, please set forth the amount of each such bill or expense, the services for which the bill or expense was incurred, and the identity of the person who rendered the bill or who was involved in the expense.

ANSWER: Medical bills in possession of Plaintiff were previously supplied. All additional bills will be supplied when received on a continuing basis.

37. Please state whether, as a result of this incident, Brenda L. Grenier and/or Edmund A. Grenier, Jr. have been unable to perform any of their customary occupational duties or social or other activities in the same manner as prior to the incident, stating with particularity: (a) the duties and/or activities that each have been unable to perform, (b) the periods of time each have been unable to perform, and (c) the identities of all persons having knowledge thereof.

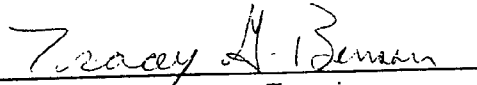
ANSWER: We are self-employed. Ed Grenier takes up the slack when Brenda is unable to perform her duties. Brenda Grenier is working at about one-fourth the speed from what she could do before the accident. Duties are varied but the bookkeeping/accounting duties for two corporations account for 80% of her duties. This cannot be performed in the same manner as before the accident as Brenda cannot sit for long periods. We now must hire others to do some of her work, under her supervision.

38. Please state whether, as a result of this incident, you have received a notice of subrogation interest on behalf of any entity or third party provider in connection with payments or benefits received by you or made on your behalf. If so, please provide the following information with respect to each such notice of subrogation:

- (a) The name and address of each entity asserting a subrogation claim;
- (b) An itemized description of the payments, benefits, and amounts included in each claim for subrogation;
- (c) The date or dates, on which any payments or benefits were paid or made to you or on your behalf;
- (d) Whether you have received a written notice of subrogation and/or documentation supporting a subrogation claim.

[If you will do so without a formal request for production of documents, please attach copies of each subrogation notice, as well as copies of supporting documentation, to your answers to these interrogatories.]

ANSWER: NO.


Tracey G. Benson, Esquire

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

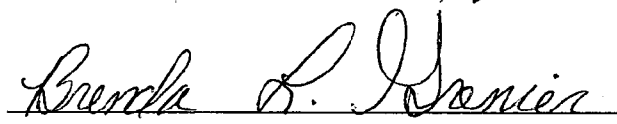
Counsel for Defendant
Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

Dated: December 4, 2001

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

Personally appeared before me, a Notary Public in and for the County and State
aforesaid, EDMUND A. GRENIER, JR., and BRENDA L. GRENIER, who, being duly sworn
according to law, depose and say that the facts set forth in the foregoing Answers to
Interrogatories are true and correct to the best of their knowledge, information and belief.


Edmund A. Grenier, Jr.


Brenda L. Grenier

Sworn to and subscribed before me this 16th day of December, 2002.


NOTARIAL SEAL
PAULA M. CHERRY, NOTARY PUBLIC
CITY OF DUBOIS, CLEARFIELD COUNTY
MY COMMISSION EXPIRES SEPTEMBER 16, 2005

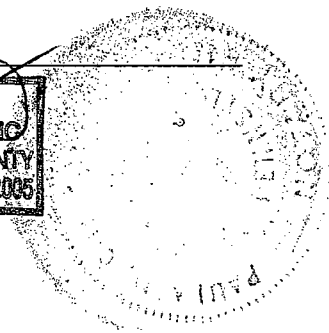


EXHIBIT B

Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, by its counsel, Tracey G. Benson, Esquire, and Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., hereby requests plaintiffs to produce pursuant to Rule 4009 of the Pennsylvania Rules of Civil Procedure for inspection and/or photocopying at the offices of Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., 124 North Allegheny Street, Bellefonte, Pennsylvania 16823, within thirty (30) days of the date of service hereof, the documents described below. In responding to this Request, you (as hereinafter defined) shall utilize the definitions and follow the instructions set forth below, each of which shall be deemed to be a material part of each request.

DEFINITIONS

1. "You" or "your" shall mean plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., as well as their agents, attorneys, accountants, consultants, independent contractors, and any other individual or entity associated or affiliated with you or purporting to act on your behalf with respect to the matter in question.
2. The word "document" as used herein shall be understood to mean all written, graphic, or otherwise recorded matter, however produced or reproduced, in the actual or constructive possession, custody, care or control of you, your officers, agents, employees and attorneys, or any of them, including but not limited to originals and all copies of correspondence, tapes, disks, photographs, telegrams, notes, sound recordings, minutes of meetings, memoranda, reports, and the like, whether made or received by you.
3. The singular of any word used herein shall be deemed to include the plural of such word and the plural shall include the singular.
4. The word "incident" shall mean the circumstances on which this action is based relating to the injuries allegedly sustained by wife-plaintiff, Brenda L. Grenier, on or about February 28, 1999.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Any and all documents reflecting, referring or relating in any way to the incident forming the basis for the allegations contained in the Complaint.
2. Any and all documents reflecting, referring or relating in any way to any investigation of the incident forming the basis for the allegations contained in the Complaint, whether conducted or undertaken by plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., husband and wife, or others.
3. Any and all documents reflecting, referring or relating in any way to statements rendered by individuals in connection with this incident, whether written, oral, signed, transcribed, recorded, or otherwise contained in any documentary form.
4. Any and all documents reflecting, referring or relating in any way to individuals who witnessed the incident alleged in the Complaint, or any activities or occurrences prior or subsequent thereto, which you contend support any of the allegations contained in the Complaint.
5. Any and all photographs, drawings, and/or diagrams reflecting, referring, depicting or relating in any way to the incident alleged in the Complaint.
6. Any and all documents, reports, or notes reflecting, referring or relating in any way to the medical, emotional or physical condition of wife-plaintiff Brenda L. Grenier from January 1, 1991, to the present.

7. Any expert reports reflecting, referring or relating in any way to issues of liability and damages for the incident alleged in the Complaint, including any reports, letters or other medical records from physicians or health care providers.

8. Any and all documents that you contend establish, either in whole, in part, or otherwise, any negligence on the part of the Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, or others which you contend resulted, in whole, in part, or otherwise, in the injuries for which you seek recovery in this lawsuit.

9. Any and all documents that you intend to rely upon in support of any allegations contained in the Complaint, including any documents that you contend support any damages that you are claiming in this lawsuit.

10. Any and all state and federal income tax returns filed by Brenda L. Grenier and Edmund A. Grenier, Jr. for the years, 1996, 1997, 1998, 1999, 2000 and 2001.

11. Copies of any and all documents in the custody or possession of plaintiffs or their counsel regarding claims for workers' compensation benefits and/or receipt of wage loss and/or medical benefits by plaintiff, Brenda L. Grenier, pursuant to the Pennsylvania Workmens' Compensation Act for any times prior to, or subsequent to, the accident identified in the Complaint.

12. Any and all documents in the custody or possession of plaintiffs or their counsel regarding Brenda L. Grenier's application for, and/or receipt of, any Social Security disability benefits, SSI benefits, or public assistance benefits for any times prior to, or subsequent to, the accident identified in the Complaint.

13. Any and all documents pertaining to litigation or claims for personal injury made at any time by plaintiff, Brenda L. Grenier, against any other parties other than Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, including demand letters, pleadings, discovery, or other related materials.

14. Any and all documents pertaining to any accidents or injuries sustained by plaintiff, Brenda L. Grenier, at any time either prior to, or subsequent to, the February 28, 1999 incident forming the subject matter of this litigation.

15. Authorizations for the release of medical records pertaining to plaintiff, Brenda L. Grenier, in a form as attached hereto or otherwise sufficient to enable defendant or its counsel to obtain any and all medical records in the custody, possession and control of health care providers identified in response to interrogatories served on you by counsel for defendant.

16. Copies of any and all correspondence, medical ledgers and/or notices of subrogation received by plaintiff asserted by the Pennsylvania Department of Public Welfare or any other insurance carrier or health care provider in connection with care rendered in response to injuries allegedly sustained in the incident alleged to have occurred on or about February 28, 1999.

Tracey G. Benson

MILLER, KISTLER, CAMPBELL,
MILLER & WILLIAMS, INC.
124 North Allegheny Street
Bellefonte, PA 16823
(814) 355-5474

Counsel for Defendant
Gray Investment Co., Inc. t/d/b/a
Best Western Inn & Conference Center

Dated: December 4, 2001

**AUTHORIZATION FOR RECORDS
OF MEDICAL TREATMENT**

TO:

I, **BRENDA L. GRENIER**, (Social Security No. _____; Date of Birth: _____), hereby authorize you to furnish to Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., or its representative, copies of any and all records, reports, notes, correspondence, x-rays, test results, or other material or information relating to **BRENDA L. GRENIER**, consultation, examination, medical history, psychological and/or psychiatric, diagnosis or treatment and to permit a representative of Miller, Kistler, Campbell, Miller, Williams & Benson, Inc. or a physician designated thereby to inspect and examine tangible materials related to such examination, diagnosis or treatment.

A photocopy of this Authorization shall be as effective as the original.

Brenda L. Grenier

On this ____ day of _____, 2001, before me personally appeared **BRENDA L. GRENIER**, the person whose name is subscribed in the foregoing Authorization and who acknowledged to me the execution of the same.

Notary Public

My Commission Expires:

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

BRENDA L. GRENIER AND
EDMUND A. GRENIER, JR.,
HUSBAND AND WIFE,

Plaintiffs,

v.

GRAY INVESTMENT CO., INC. t/d/b/a
BEST WESTERN INN & CONFERENCE
CENTER,

Defendant.

v.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant.

CIVIL ACTION NO.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **REQUEST FOR PRODUCTION OF DOCUMENTS**, was hereby served by depositing the same within the custody of the United States Postal Service, First Class, postage prepaid, addressed as follows:

Toni M. Cherry, Esq.
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

Troy J. Harper, Esq.
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON INC.

By:

Tracey G. Benson

Dated: December 4, 2001

EXHIBIT C

March 9, 1999

Brenda Grenier
RD 4, Box 229
DuBois, PA 15801
(814) 583-7406

RE: Best Western Inn & Conference Center
and Travelers Insurance

On Sunday February 28, 1999 at approximately 4:45PM Mrs. Grenier slipped and fell on the Metal Strips between the two(2) double doors at the Best Western Inn and Conference Center in DuBois, PA. She was attending an Awards Ceremony for a local girls Baton Corps. There was no alcohol served and the conditions that day were scattered rain showers. The floor was slippery and wet.

Mrs. Grenier was observed by at least two other people when she fell and they will attest to seeing her slip and fall. Another person in attendance who did not see her fall will attest to almost slipping and falling herself earlier in the day at the same location.

Mrs. Grenier wishes to have all medical bills paid and compensation for any therapy and equipment needed to recover. In addition she wishes to have any extra help compensated as she and her husband have two businesses 35 miles apart and a 7 year old daughter in 1/2 day kindergarten that is taken to and from school. With all the traveling between both businesses now being done exclusively by her husband, there is no way that she can function on crutches and on medication without extra help until her recovery is complete. She would also like to have the problem corrected at the location of her fall so that others will not meet the same fate as Brenda. Brenda has found out that another woman fell at the same location about one year ago and was also injured.

The accident was reported to the Best Western Inn immediately after she fell by Mrs. Jackie Sykich. Mrs. Grenier screamed when she fell and tried to get up but could not. She was then assisted by others and they observed her knee and ankle swollen and she could not apply any weight to her left foot. They sat her down and elevated her leg and applied ice to her knee for approximately 10 minutes.

Brenda was asked if she wanted an ambulance and she declined because she didn't want her daughter traumatized by the ambulance crew when she already was upset because her mother had fallen in pain. Mrs. Grenier and her daughter were driven home by Mr. Paul Sykich where Mr. Grenier then immediately drove Brenda to DuBois Regional Medical Center. They arrived at the hospital at approximately 5:40PM and had to be helped from her vehicle by hospital staff into a wheelchair. She was given treatment, an X-ray, and sent home with medication for her pain and swelling of her left knee, leg and ankle.

Brenda was released at approximately 9:30PM on crutches and her left leg was in an immobilizer. She contacted her family doctor, Dr. Gregory Austin, the next day and has been referred to an orthopedic surgeon.

Lastly, on Tuesday March 2, 1999, Ms. Jerri Gosser of Travelers Insurance called Mrs. Jackie Sykich at work and questioned her about the accident. On Wednesday March 3, 1999 Ms. Gosser called Mrs. Grenier and questioned her. She wanted to call back and tape record Brenda Grenier. Mr. Grenier called Ms. Gosser and left message that Mrs. Grenier was on medication and he would prefer she would be left alone and not tape record her at this time. Mrs. Gosser's phone number is 1-800-238-6285, ext. 4232.

WITNESSES TO THE ACCIDENT

1. Jody Joiner
1578 Treasure Lake
DuBois, PA 15801
Ph.# 814-375-4197
2. Denise Montini
42 East Scribner Ave.
DuBois, PA 15801
Ph.# 814-371-2808

The person that was mentioned that almost fell at the same location is:

1. Sherri Reitz
RR 1, Box 103-B
DuBois, PA 15801
Ph.# 814-371-8134

EXHIBIT D

Page 30

I know.

Q Did you physically though see any type of wet footprints or accumulations of water?

A No, not at that time, no.

Q You indicate then after you fell, you screamed?

A Yes.

Q Did you try to get up?

A I tried to get up, I couldn't. I wanted to get up, I couldn't.

Q Who then came to your assistance?

A There was a couple of men and a couple of ladies. There was Denise Martini and Jody and two gentlemen, and then followed by Mr. Brennan coming in and seeing me, seeing me in the chair.

Q And you referenced Jody, is that Jody Jointer?

A Yes, sir.

Q And you said there were two men?

A Yes, sir.

Q Do you know who they were?

A One of them was Sherry Reitz's husband, I don't know who the other gentleman was.

Q Then you indicated Mr. Brennan then also came in?

A He come in when I was in the chair.

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Q So after these folks assisted you up, they put you in a chair inside the conference center?

A Yes, they put me in two chairs actually and they went to the kitchen and there was automatic ice there, they got ice, found something to wrap ice and put it on my ankle and my knee.

Q And you indicate that someone called up to the hotel. Do you know who that someone was?

A Yes. Jackie Syktich did.

Q And were you able to hear her call up or how do you know she called up?

A No, sir. She said she had called up. She had spoken with Ann I believe.

Q Did Jackie tell you she reported that you had fallen?

A Yes, sir.

Q And did anybody at all from the hotel then or the conference center come down to see you?

A No one came down, no, sir, no. Not at all.

Q Did you talk to anybody from the hotel at any point from the time you fell to the time you left the conference center that day?

A No, sir.

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Q You indicated then that Mr. Syktich, he is the one who drove you home that day?

A Yes, sir.

Q And did he drive your vehicle?

A He drove my vehicle.

Q When you left to go home that day, did you have to go back through the vestibule area?

A They had, yes, because this was the only way we could get out and I had- there was- the gentleman helped me get out the doors with me leaning on both of them like, and I was injured. And then Mr. Syktich pulled up in front right at the curb there, he pulled right here, (indicating).

Q Okay. You are pointing to the top photograph of Exhibit 1, the driveway right in front of the sidewalk?

A Yes, sir.

Q When you went back through the vestibule when you were leaving, after you had already fallen, did you notice whether or not there was any water accumulating?

A I didn't notice anything.

Q You indicated that Denise and Jody and these two gentlemen helped you up?

A Yes.

Page 33

Q To your knowledge, did any of those people actually see you fall?

A Yes. Jody and Denise saw me fall.

Q Do you know where they were located when you fell?

A They were - we had food tables set up over here, (indicating).

Q You are pointing to the bottom photograph of Exhibit 1 off to the right side?

A Yes, sir. We had food tables set up on this side and we had food tables set up on this side and they were over in here (indicating).

Q You are pointing to the right hand side of that photograph?

A Yes. They could see me. I was in the glass area here. They were behind the second set of doors.

Q While you were there that afternoon, before you left to be driven home, did you have any conversations with Jody or Denise about what they saw?

A No. I was in pain.

Q Did you talk to either of the two gentlemen that helped you up?

A No.

EXHIBIT E

LAW OFFICES OF
MILLER, KISTLER, CAMPBELL, MILLER, WILLIAMS & BENSON, INC.
A PROFESSIONAL CORPORATION

JOHN R. MILLER, JR.
RICHARD L. CAMPBELL
JOHN R. MILLER, III
TERRY J. WILLIAMS
TRACEY G. BENSON
SCOTT C. ETTER, Ph.D.
ELIZABETH A. DUPUIS
DAVID B. CONSIGLIO
STACY PARKS MILLER
JULIA R. CRONIN

PLEASE REPLY TO:
BELLEFONTE OFFICE

124 NORTH ALLEGHENY STREET
BELLEFONTE, PA. 16823-1695
(814) 355-5474
GENERAL FAX (814) 355-5340
REAL ESTATE FAX (814) 357-0264
AND
720 SOUTH ATHERTON STREET
STATE COLLEGE, PA. 16801-4628
(814) 234-1500
FAX (814) 234-1549

January 5, 2005

COUNSEL TO THE FIRM
ROBERT K. KISTLER

Toni M. Cherry, Esquire
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

RE: Grenier v. Gray Investment Co., Inc. v. Hallstrom Construction, Inc.
No. 2001-00263-CD (Clearfield County)

Dear Ms. Cherry:

I am contacting you because I would like to depose Jody Joiner and Denise Montini, who Mrs. Grenier identified as having witnessed the subject fall. I have been unable to reach Ms. Joiner and Ms. Montini using the addresses and telephone numbers provided by your clients in answers to discovery. Will you please speak with the Greniers and locate the current whereabouts of Ms. Joiner and Ms. Montini so that we can arrange for their depositions?

Thank you for your time in this matter.

Very truly yours,

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.

By:


Julia R. Cronin

JRC/lac

cc: Troy Harper, Esq.

EXHIBIT F

LAW OFFICES OF
MILLER, KISTLER, CAMPBELL, MILLER, WILLIAMS & BENSON, INC.
A PROFESSIONAL CORPORATION

JOHN R. MILLER, JR.
RICHARD L. CAMPBELL
JOHN R. MILLER, III
TERRY J. WILLIAMS
TRACEY G. BENSON
SCOTT C. ETTER, Ph.D.
ELIZABETH A. DUPUIS
DAVID B. CONSIGLIO
STACY PARKS MILLER
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PLEASE REPLY TO:
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REAL ESTATE FAX (814) 357-0264
AND
720 SOUTH ATHERTON STREET
STATE COLLEGE, PA. 16801-4628
(814) 234-1500
FAX (814) 234-1549

March 2, 2005

COUNSEL TO THE FIRM
ROBERT K. KISTLER

Toni M. Cherry, Esquire
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

RE: Grenier v. Gray Investment Co., Inc. v. Hallstrom Construction, Inc.
No. 2001-00263-CD (Clearfield County)

Dear Ms. Cherry:

I am writing in follow up to my letter of January 5, 2005, in which I asked that you provide me with contact information for Jody Joiner and Denise Montini, so that I can arrange for their depositions. As you know, Mrs. Grenier identified Ms. Joiner and Ms. Montini as having witnessed the subject fall. The contact information provided by your clients in discovery is incorrect. Please provide me with current information as to Ms. Joiner and Ms. Montini's whereabouts so that I can schedule their depositions.

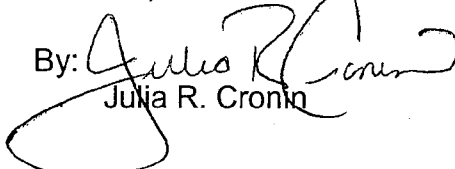
I will likely depose Sherry Reitz at the same time. I have accurate contact information for her.

Finally, I join in Mr. Harper's request that you provide us with any and all documentation your clients are relying on in support of Mr. Grenier's claims of lost sales/business income as a result of injuries sustained by Mrs. Grenier in the subject fall. I also request documentation confirming the existence and amount of the lien for medical expenses paid by Mrs. Grenier's health insurance carrier.

Thank you in advance for your cooperation on these matters.

Very truly yours,

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.

By: 
Julia R. Cronin

JRC/lac
cc: Troy Harper, Esq.

EXHIBIT G

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Center at all.

Q In your wife's deposition she indicated that she thought that maybe you had called someone the day after the accident at Best Western. Do you recall doing that?

A Like I just said awhile ago, you asked me a similar question. I thought, I can't remember if she called or I called, okay. One of us called.

Q I want to switch gears a little bit if we can, Mr. Grenier. Your wife testified earlier in her deposition that for a period of time after the accident that she essentially had to stay in the house and she had to have some assistance bathing and getting dressed and that you were the person that helped her do those things.

Is that correct to the best of your recollection?

A Yes.

Q Other than helping her bathe and getting dressed, what other types of things did you have to do for her while she was in that period of time when she was basically in the house?

A Cooked, did clothes, took care of the kid, what she couldn't do sometimes, you know. She was under medication, you got to figure that she was in la-la land half of the time. She tried not to take the medication during the

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day when I was at work, but in the evening she was so, she really needed it. So she took the medication more towards the evening because I wasn't home and that medication put her to sleep, you know, and we had a daughter that was almost three so she couldn't be asleep and watch her. So I had to come home early and I had to cut back on my work of evening appointments. It cost me money, okay, it cost me time. My income is in sales.

So I came home early and did duties that she would have normally done while she was—that pain medicine puts you in la-la land.

Q You indicated that you had to do some of the cooking after her injury and before she was up and about again. Prior to her injury, who did the cooking at home?

A About 90 percent her. Once in awhile I make a pot of chili.

Q After that accident while she was still kind of confined to the house, did you then take over doing the 90 percent of the cooking?

A Yes, I would say, yes.

Q For how long of a period of time did you continue to do the majority of the cooking at home?

Page 28

1 A I'd say probably two or three months.

2 Q You indicated that after her accident you had
3 to do the laundry. Who did the laundry for the most part
4 prior to her accident?

5 A She did, but it was down, it's a split level
6 home, all the way down in the basement area, she couldn't get
7 up and down the steps to do it.

8 Q Was there a period of time after the accident
9 that she returned to doing the family laundry?

10 A I'd say probably six months to a year in there.

11 Q And were you the one who did the laundry for
12 that period of time then?

13 A Yes. And then she went to Dr. Ellis and had
14 the operation which was about a year after the accident and
15 then I was still at it for another four months.

16 Q So there was an additional period of time
17 after her surgery that you had to do the cooking and the
18 laundry?

19 A Yes.

20 Q That was about a four month period?

21 A Yes, about four or five months, yes.

22 Q For how long a period of time did you have
23 to assist your wife in bathing and dressing?

Page 29

1 A On and off probably a year and a half.

2 Q So there would have been a period of time
3 immediately after the accident and a period of time
4 after that surgery that you had to help her with that?

5 A Right. That was more concentrated during that.

6 Q Were there any other specific duties that you
7 had to pick up doing around the house that we haven't
8 already talked about?

9 A Cleaning. She didn't have a cleaning person.
10 She had a cleaning person part of that time and then I can't
11 remember when she stopped and then I just kind of took over
12 most of it.

13 Q I want to switch gears a little bit on you and
14 earlier your wife indicated that maybe you had some knowledge
15 about whether or not she had been contacted by your private
16 health insurer with regard to reimbursement for the medical
17 expenses that paid for your wife's care?

18 A Yes.

19 Q Have you been contacted concerning that?

20 A Concerning, yes, we forwarded letters to Mrs.
21 Cherry from some outfit trying to collect from Geisinger.

22 Q Some outfit trying to get money back for
23 Geisinger for the medical bills they paid for your wife?

Page 30

A Yes, Socrates or something out of Erie.

Q Do you know the amount that they were trying to collect?

A No. I think they wanted to-whatever amount I can't remember. I can't remember. I just can't.

Q Your wife testified earlier that she did have some out of pocket expenses for her medical care and prescriptions that she wasn't sure of the amount. Do you have any idea of what that amount may be?

A No. You figure gas to go back and forth to State College, extra expenses, wheelchair twice, you know, different medical devices where the insurance only paid half or whatever. I would say around \$500.00.

Q About \$500.00?

A Yes. Gas expenses and everything over a period of a year and a half or two years there, extra, up and above what we would be spending on ourselves, out of pocket, yes.

Q I want to switch gears with you again Mr. Grenier. Your wife testified in her deposition that from her perspective that she didn't have any lost wage claim because she was getting paid regardless whether she was at work or not at work. And I want to ask you, from your perspective as the President of the company, are you

Page 31

contending that you lost any amount of business or wages as a result of the injuries that your wife sustained and the time she missed from work?

A She was fortunate to have a job where we both owned the company, first of all. If she was working for someone else she would not have had a paycheck for awhile. As far as I'm concerned, I did probably lose sales volume that I normally could have made in the evening hours when I was home taking care of her.

Q Let's talk about that then, this last sales volume. First of all, what period of time was it that you had to come home early and wouldn't have been available to work on your business in those evening hours for sales calls?

A I would say probably about a year and a half and that goes all the way through her operation and the recovery from the operation.

Q So you got about a year and a half period you are talking about where you had to leave work early and come home so you weren't available to make sales calls during the evening?

A Right. Because most of the families that I see, they worked day shift and you set a 6:30, 7:00 o'clock appointment with them like an insurance agent would.

Page 32

1 You go to their home and show them what we do.

2 Q That's one of your duties at your business is
3 that you made sales calls to people's homes?

4 A Right.

5 Q Are you the only person in that company that
6 makes sales calls?

7 A Now?

8 Q Yes, now.

9 A Now, yes. Then, no.

10 Q Now, let's talk about then in February of '99,
11 how many people did you have at your company that did sales
12 calls?

13 A Me and two others, whenever they felt like
14 working.

15 Q Who was- what were their names?

16 A Frank Ruffollo and John Perry.

17 Q Was their only job in the sales position?

18 A Yes.

19 Q And Frank and John worked for you in February of
20 '99?

21 A I believe so, I can't be sure. They worked
22 for me during that year and a half period of time.

23 Q Is Frank still working for your company?

Page 33

1 A No.

2 Q When did he stop working for you?

3 A He stopped at the end of '99, yes, or beginning
4 of 2000.

5 Q Does John still work for you?

6 A No. He left six months prior to Frank. He left
7 September of '99.

8 Q Between your wife's accident in February of '99
9 and presently, did you have any other sales people other than
10 Frank and John?

11 A In the year 2000, towards the end of the year,
12 October, until 2001 and June I had a couple sales people
13 there, other than myself.

14 Q How many did you have during that period?

15 A Just two more.

16 Q Who were they?

17 A I can't remember. Ted Martin and he had a
18 Trina or something or other. I can't remember her last name,
19 but he was an independent contractor, he came in and did the
20 sales, he hired her. So he would know who she is.

21 Q And the sales people on your staff, would they
22 also be the ones making evening calls to people's homes?

23 A Yes, 80 percent of the time it's evening calls,

Page 34

unless you catch two retired people during the day.

Q Have you, Mr. Grenier, in any fashion, attempted to calculate what you contend your lost sales volume was as a result of these injuries to your wife?

A Well in my experience, I could get people during the day. I concentrate on retired people. There again I would say my sales volume was cut down probably about 20 percent, 20 to 25 percent.

Q Now, would that be a cut in sales calls or would that be a cut in the actual sales made?

A Sales made.

Q What is your basis for arriving at that 20 to 25 percent cut in sales made? How do you arrive at that?

A I just take the sales volume for the previous year and look at it to see what it was and look and see what it was now.

Q Does your company maintain accounting books that would show your sales volume for 1998?

A You don't need that, we have a CPA that does that financial sales part of that.

Q So you have a CPA that does your financials for your corporation?

A Right, shows total sales for the year.

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Q And would you have those available for the years, let's say between 1997 and 2002?

A I'd have to look for them but I probably could come up with them.

Q Well we are going to request that we get those. Were you required to hire any additional staff people because of the injuries to your wife and the fact that there was a period of time that she wasn't coming to the office?

A Carol Armstrong, she was hired mainly to do the bookkeeping.

Q We are going to take a look at that then, I think it's Exhibit No. 7. Looking at Exhibit Number 7, it appears to be a 1099 made out to Carol Armstrong for the calendar year 2001. Why did you hire Carol Armstrong?

A To do the bookkeeping. She was an independent contractor and she did the bookkeeping which my wife now is doing.

Q Did Carol only work for your company as an independent contractor in the calendar year 2001?

A I believe so, I'm not sure. I believe we had somebody else in there. Vasbinder. Here is one right here. I don't know who else we had. I just can't remember.

Q Let's talk about Carol Armstrong first in Exhibit

Page 36

1 **No. 7. Looks like you paid her \$9,565.00 for 2001. Am I**
2 **correct in understanding that it's your position that you**
3 **hired this lady to do the job that your wife would have been**
4 **doing?**

5 **A** Yes.

6 **Q** And that you would not have incurred this
7 **\$9,650.00 expense had your wife not been injured?**

8 **A** Had my wife not been injured there was no need
9 to hire her to do that.

10 **Q** Let's take a look then at Exhibit No. 8
11 **which is a 1099 for the calendar year 1999 indicating**
12 **Vasbinder Accounting and Tax Service for an amount of**
13 **\$2,862.50. What service was Vasbinder providing for you?**

14 **A** She was doing the same thing this girl was.

15 **Q** The same thing that Carol was doing, Carol
16 **Armstrong?**

17 **A** Right, but she only worked a few months at the
18 end of '99 then she worked in the next year, 2000 also.

19 **Q** Were you required to contract with and hire
20 **Vasbinder because of the injuries to your wife?**

21 **A** Yes and no, okay.

22 **Q** Can you explain what you mean?

23 **A** We hired her in '99 because we had a person

Page 37

1 that was doing it and he left us. He left us because I told
2 him, I said, the sales are dropping, okay, because I'm having
3 to spend more time at home, I told him we'd try to find him
4 another job and he did. We had to hire her to do it in the
5 interim, and then in 2000. And then in 2001 we had Carol
6 Armstrong. But the problem was we didn't have anybody- all
7 the work was out there, the two safes
8 were out there, everything was out there, the computer was out
9 there, everything. So what we did was we brought it all in to
10 our home and now my wife does what these people are doing.
11 She does that now and she has a girl come in that knows
12 computers and she's been entering monthly data on the computer
13 and the year ends and it only cost me about \$45.00 a month for
14 that to happen now. My wife does the rest of it, what these
15 people were doing.

16 **Q** I want to follow up on there. You indicated that
17 **you had someone prior to Vasbinder that was doing- strike**
18 **that. What was Vasbinder doing for you when you hired them in**
19 **'99?**

20 **A** She was- the only thing she did was
21 accounting and tax service.

22 **Q** She was doing your bookkeeping?

23 **A** She was doing the bookkeeping, except the

Page 42

done during this period of time because she come in and trained Vasbinder and Carol Armstrong. She came in on crutches, I brought her in on crutches and she showed them how to do this stuff because they didn't know how to do the cemetery end of it.

Q But Vasbinder was doing the work that Mr. Speicher had done, is that correct?

A On a part time basis, they came in only on a part time basis, I think they were fifteen, twenty dollars an hour, and just did the accounting. He did the sales contracts, he did everything. They weren't doing that.

Q Who is he?

A Speicher. He did the whole thing, he was the office manager. He did the sales contracts, he did the accounting, he did the bookkeeping, he did everything, where these people only came in a couple days a week, Vasbinder and Armstrong, they weren't in every day like Robby Speicher was. They came in twice a week, usually Tuesdays and Thursdays. So these were part time people here. Speicher, when he left, we didn't replace his job duties, we didn't need him, I told him we didn't need him, that's why he went elsewhere.

Q So if Vasbinder and then Ms. Armstrong were

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only doing part of the duties that Mr. Speicher had been doing, who was filling in for the rest of the duties?

A You are looking at him, me.

Q When was it that your wife began to work from home after February of '99?

A In September of 2001. We moved all the bookkeeping to the home, we hired a truck, moved all the stuff over here, over to DuBois.

Q Are you telling me that from the date of the accident in 1999 until September 2001 your wife did not perform any duties with the business?

A You got it. That's affirmative.

Q You testified earlier that you believed that you lost sales volume of 20 percent to 25 percent. For what period of time do you believe you lost such?

A About a year and a half.

Q Can you put a number or figure on that?

A Well let's see, I'm used to selling about two hundred fifty to three hundred thousand a year. I was down, well I am now- probably about forty thousand dollars a year in sales volume and that's conservative, very conservative.

Q Now, I assume you were able to make some

Page 44

1 telephone calls from home in the evening even though your
2 wife had some injuries, is that correct?

3 A Yes.

4 Q And you are probably able to make some sales
5 calls in the evening even though your wife had injuries,
6 is that correct?

7 A I curtailed my evening sales calls.

8 Q How did you do that?

9 A I stopped them all together.

10 Q Why was that?

11 A My wife was on medication, she couldn't take
12 the one that put you in la-la land while the little girl
13 was up and running. In the day time I'd stop back in maybe
14 two, three times a day between appointments and see if
15 everything was going all right. She would take the heavy pain
16 medicine at night basically because, you know,
17 if you are talking stuff that makes you drowsy and you got a
18 three year old running around the house, let's be realistic
19 here, you don't take it, or you let your little girl catch
20 herself on fire or something, you are going to be up. You
21 take it at night when your husband is home. I came home, I
22 didn't go on evening calls, I came home and cooked supper.

23 Q Did you ever look into getting a babysitter or

Page 45

1 a nanny to help you out in the evenings so that you could
2 continue to make your sales calls?

3 A We made calls here and there and got different
4 people in and out maybe for a week at a time but they
5 weren't the type of people we- you know, they were just
6 fly by night people.

7 Q Or a high school babysitter that could help
8 you out?

9 A No, we didn't, because we live on Cook Road
10 between, at that time, we lived between DuBois and Rockton and
11 we didn't look into teenagers or high school kids or anything.
12 It was hard to get anybody to help during the day.

13 Q Did you hire any sales individuals because of
14 your wife's injuries? You testified- let me clarify that.
15 You testified that in 1999 you had Frank and John helping you
16 out in the sales field then after that you had Ted Martin and
17 a woman named Trina helping you out in the sales field. Were
18 any of those individuals hired because of your wife's
19 injuries?

20 A Frank Ruffollo has worked for me since 1992 and
21 he worked for me until the end of '99 or the beginning of
22 2000. John Perry worked for me in '98. I think he came
23 in the end of '97 and stayed until, I think September of

EXHIBIT H

DENNISON, DENNISON & HARPER

Attorneys at Law

Donald J. Dennison (1917-2002)
John C. Dennison, II
Troy J. Harper

293 Main Street
Brookville, PA 15825-1291
Telephone (814) 849-8316
Fax (814) 849-4656
E-Mail ddb@usachoice.net

February 9, 2005

Toni M. Cherry, Esq.
Gleason, Cherry and Cherry, L.L.P.
One North Franklin Street
P.O. Box 505
DuBois, Pennsylvania 15801

RE: Grenier v. Gray Investment Co., Inc. v. Hallstrom Construction, Inc.
No. 2001 -263 C.D. (Clearfield County)

Dear Toni:

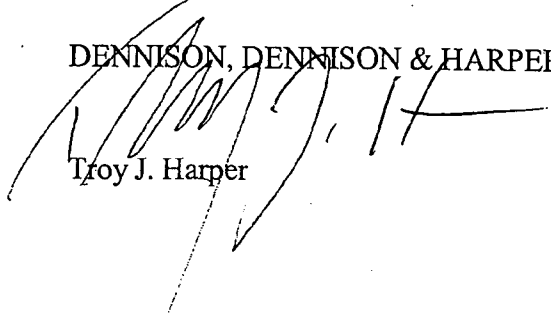
It was a pleasure bumping into you recently at the Courthouse. As you indicated, you have obtained the financial information from Grenier Enterprises that Mr. Grenier was relying on in making his lost sales claim as he testified during his deposition. I would appreciate it if you would please forward that information to me and Julia Cronin as soon as possible.

In addition., Mr. Grenier indicated in his deposition that he had been put on notice of a lien for medical expenses that were paid for by Mrs. Grenier's health insurer. I request that you please provide us with written confirmation of that lien from the carrier and the amount of the same.

Thank you for your cooperation.

Very truly yours,

DENNISON, DENNISON & HARPER


Troy J. Harper

cc: Julia Cronin, Esq.

~~Julia R. Cronin, Esquire~~

FILED

JUN 20 2005

William A. Shaw
Prothonotary/Clerk of Courts

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,

Additional Defendant

No. 2001-263 C.D.

FILED ^{GP} 4CC
01/10/25/01 Amy T.
JUL 22 2005 Cherry
William A. Shaw (will serve)
Prothonotary/Clerk of Courts

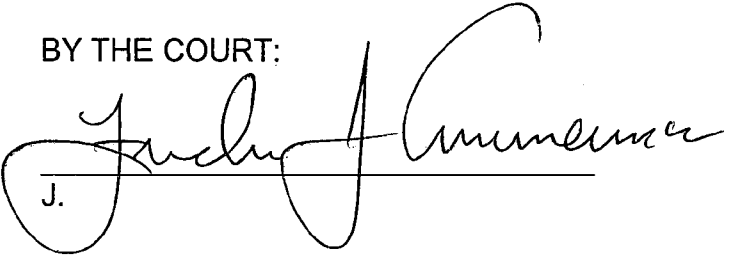
ORDER OF COURT

NOW THIS 22 day of July, 2005, upon consideration of the Motion to Compel filed by Defendant Gray Investment Co., Inc. t/d/b/a Best Western Inn & Conference Center, the Court does hereby ORDER, DIRECT and DECREE that the Plaintiffs, Brenda L. Grenier and Edmund A. Grenier, Jr., husband and wife, shall:

1. produce current addresses and telephone numbers for Jody Joiner and Denise Montini within twenty (20) days of the date of this Order or be barred from presenting any testimony from Jody Joiner and Denise Montini at trial;
2. produce any and all documents which support Plaintiff Edmund Grenier's claim for lost sales within twenty (20) days of the date of this Order or be barred from making a claim for lost sales at trial; and

3. produce written confirmation of any and all liens by Plaintiffs' health insurance carrier and documentation of the amount of said lien(s) within twenty (20) days of the date of this Order or be barred from presenting a claim for medical expenses at trial.

BY THE COURT:


J.

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

)
)
)
) No. 2001-263 C.D.
)
) **Type of Pleading:** Affidavit of
) Service
)
) **Filed on Behalf of:** Defendant Gray
) Investment Co., Inc. t/d/b/a Best
) Western Conference Center
)
) **Counsel of Record for this Party:**
)
) Tracey G. Benson, Esq.
) Julia R. Cronin, Esq.
) Miller, Kistler, Campbell, Miller,
) Williams & Benson, Inc.
) 124 N. Allegheny Street
) Bellefonte, PA 16823
) 814-355-5474

FILED ^{NO} CC
m/1:426
JUN 27 2005 LB

William A. Shaw
Prothonotary/Clerk of Courts

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

No. 2001-263 C.D.

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

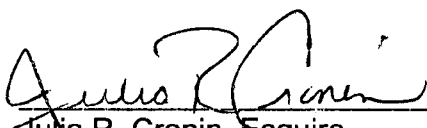
vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

AFFIDAVIT OF SERVICE

I, Julia R. Cronin, Esquire, counsel for Defendant Gray Investment Co., Inc., t/d/b/a Best Western Inn & Conference Center, hereby certify that I served the Rule to Show Cause dated June 21, 2005 pertaining to Defendant's Motion to Compel against Plaintiffs as follows:

- (1) Service upon the Plaintiffs by service on their counsel of record, by depositing the same in the United States mail, first class, postage prepaid on June 24, 2005;
- (2) Service upon the Additional Defendant by service on its counsel of record by depositing the same in the United States mail, first class, postage prepaid on June 24, 2005.


Julia R. Cronin, Esquire

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.
124 N. Allegheny Street
Bellefonte, PA 16823
814-355-5474

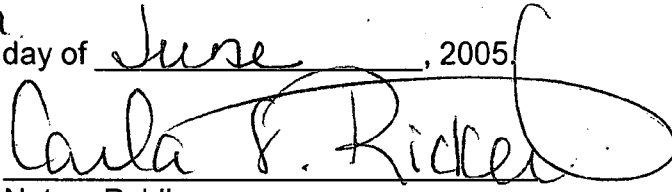
Counsel for Defendant

Sworn to and subscribed before me this 24th day of June, 2005.

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Carla S. Rickert, Notary Public
Bellefonte Boro. Centre County
My Commission Expires Feb. 28, 2006

Member, Pennsylvania Association of Notaries


Notary Public

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

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,

Plaintiffs

No. 2001-263 C.D.

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,

Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

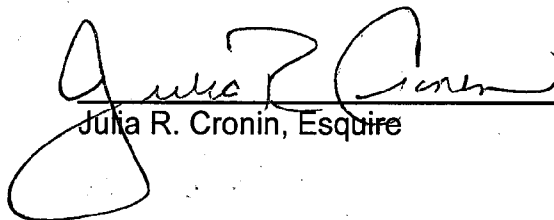
CERTIFICATE OF SERVICE

I, Julia R. Cronin, Esquire of the law firm of MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC., hereby certify that the foregoing Affidavit of
Service was served this 24th day of June, 2005 by
mailing same first class United States mail, postage prepaid, addressed to:

Toni Cherry, Esquire
Gleason, Cherry and Cherry
One North Franklin Street
P.O. Box 505
DuBois, PA 15801

Troy J. Harper, Esquire
Dennison, Dennison & Harper
23 Main Street
Brookville, PA 15825

MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.


Julia R. Cronin, Esquire

FILED

NOV 27 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs

vs.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

vs.

HALLSTROM CONSTRUCTION, INC.,
Additional Defendant

: No. 2001 - 263 C.D.

:

: Type of Case: CIVIL

:

: Type of Pleading: PRAECIPE TO MARK

: CASE SETTLED, DISCONTINUED AND

: ENDED

:

: Filed on Behalf of: BRENDA L. GRENIER and

: EDMUND A. GRENIER, JR., Husband and

: Wife, Plaintiffs

:

: Counsel of Record for these Parties:

:

: TONI M. CHERRY, ESQ.

: Supreme Court No.: 30205

:

: GLEASON, CHERRY AND

: CHERRY, L.L.P.

: Attorneys at Law

: P. O. Box 505

: One North Franklin Street

: DuBois, PA 15801

:

: (814) 371-5800

FILED 11/10/15m disc. issued to
DEC 26 2006 ATT. T. Cherry

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

**BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs**

:
:
:
:
:
:
: No. 2001 - 263 C.D.

VS.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

vs.

HALLSTROM CONSTRUCTION, INC., :
Additional Defendant :

PRAECIPE TO MARK CASE SETTLED, DISCONTINUED AND ENDED

TO WILLIAM A. SHAW, PROTHONOTARY

Sir:

Kindly mark the above-captioned case settled, discontinued and ended.

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By 
Attorneys for Plaintiffs

Dated: December 22, 2006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

**BRENDA L. GRENIER and
EDMUND A. GRENIER, JR.,
Husband and Wife,
Plaintiffs**

VS.

GRAY INVESTMENT CO., INC.,
t/d/b/a BEST WESTERN INN &
CONFERENCE CENTER,
Defendant

VS.

HALLSTROM CONSTRUCTION, INC., :
Additional Defendant :

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December, 2006, a true and correct copy of Plaintiffs' Praecepto to Mark Case Settled, Discontinued and Ended was sent to the following persons by mailing the same to them by United States First Class Mail, postage prepaid, by depositing the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

JULIA R. CRONIN, ESQ.
Miller, Kistler, Campbell,
Miller, Williams & Benson, Inc.
Attorneys at Law
124 North Allegheny Street
Bellefonte, PA 16823-1695

TROY J. HARPER, ESQ.
Dennison, Dennison & Harper
Attorneys at Law
293 Main Street
Brookville, PA 15825-1291

GLEASON, CHERRY AND CHERRY, L.L.P.

By Philip Cherry
Attorneys for Plaintiffs

Dated: December 22, 2006

LAW OFFICES
GLEASON, CHERRY AND CHERRY, L.L.P.
P.O. Box 505
DuBois, PENNSYLVANIA 15801-0505

TONI M. CHERRY
PAULA M. CHERRY
EDWARD V. CHERRY
1950-1990
JAMES A. GLEASON
1946-1975

ONE NORTH FRANKLIN STREET

AREA CODE 814
371-5800
FAX NUMBER
(814) 371-0936

December 22, 2006

William A. Shaw, Prothonotary
Office of the Prothonotary
Clearfield County Courthouse
P. O. Box 549
Clearfield, PA 16830

**RE: GRENIER vs. GRAY INVESTMENT CO., INC. vs.
HALLSTROM CONSTRUCTION, INC.
No. 2001 - 263 C.D.**

Dear Mr. Shaw:

We are enclosing herewith on behalf of the Plaintiffs an original and one copy of a Praecipe to mark the above-captioned case settled, discontinued and ended. Would you kindly mark the original filed of record, certify the copy and leave it in our box.

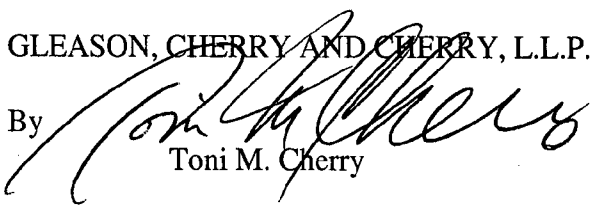
By copy of this letter, we are forwarding a true and correct copy of the Praecipe to mark this case settled, discontinued and ended to Julia R. Cronin, Esq., counsel for Defendant, and Troy J. Harper, Esq., counsel for Additional Defendant.

Thanking you for your kind attention to this matter and wishing you a very Happy New Year, we remain

Very truly yours,

GLEASON, CHERRY AND CHERRY, L.L.P.

By


Toni M. Cherry

TMC:mls

Enclosures

cc/w.enc.: Julia R. Cronin, Esq.
Troy J. Harper, Esq.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Brenda L. Grenier
Edmund A. Grenier Jr.

Vs.

No. 2001-00263-CD

Gray Investment Co., Inc.
Best Western Inn & Conference Center
Hallstrom Construction, Inc.

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 December 26, 2006, marked:

Settled, discontinued and ended

Record costs in the sum of \$80.00 have been paid in full by Toni M. Cherry, Esq. .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 26th day of December A.D. 2006.



William A. Shaw, Prothonotary