

01-369-CO.
RICHARD T. HUGHES, Consulting -vs- ROBERT STUTMAN, ESQUIRE
Engineer

*** ACTIVITY REPORT ***

Feb.21 '04 1:28

Tx. TOTAL PAGES 006630
Rx. TOTAL PAGES 002503
PRINT TOTAL PAGES 005819

NO.	DATE	START	TIME	PARTNER	MODE	PAGE	RESULT
Tx.							
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2	Feb.20	16:52	0'44	3713241	G3	01	OK

Rx.

Date: 02/25/2004

Clearfield County Court of Common Pleas

User: BANDERSON

Time: 03:50 PM

ROA Report

Page 1 of 1

Case: 2001-00369-CD

Current Judge: Fredric Joseph Ammerman

Richard T. Hughes Consulting Engineers vs. Robert Stutman Esq

Civil Other

Date	Judge
03/14/2001	Filing: Civil Complaint Paid by: Ryan, John R. (attorney for Richard T. Hughes Consulting Engineer) Receipt number: 1822023 Dated: 03/14/2001 Amount: \$80.00 (Check) Three Certified Copies to Attorney Ryan No Judge ✓
03/22/2001	Affidavit of Service, Complaint upon Robert Stutman, Esq.. Filed by s/John R. Ryan, Esq. No CC No Judge ✓
04/09/2001	Preliminary Objections of Defendant, Robert Stutman, Esq. to Plaintiff's Complaint Pursuant to PA. R.C.P. 1028(4), filed by Atty. Shovlin No Cert. Copies No Judge ✓
01/21/2004	ORDER, AND NOW, this 21st day of January, 2004, re: Status Conference scheduled for Friday, February 6, 2004, at 10:45 a.m., in Courtroom No. 1. by the Court, s/FJA,P.J. 1 cc Atty Ryan, Shovlin John K. Reilly Jr. ✓
02/02/2004	ORDER, NOW, this 2nd day of February, 2004, re: Status Conference continued from Friday, Feb. 6, 2004, to Tuesday, Feb. 17, 2004, at 11:30 a.m., in Courtroom No. 1. by the Court, s/FJA,P.J. 2 cc to Atty Ryan, Shovlin, 1 copy President Judge Ammerman and CA John K. Reilly Jr. ✓
02/18/2004	ORDER, AND NOW, this 18th day of February, 2004, re: Argument on Preliminary Objections of Defendant scheduled for Thursday, March 4, 2004, at 2:30 p.m. in Courtroom No. 1. by the Court, s/FJA, P.J. 1 cc Atty Ryan, Shovlin Fredric Joseph Ammerman ✓

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING
ENGINEER,

Plaintiff

CIVIL DIVISION

No. 01 - 369 - CD

Vs.

ROBERT STUTMAN, ESQUIRE,
Defendant

COMPLAINT

Filed on Behalf of:

Plaintiff, RICHARD T. HUGHES
CONSULTING ENGINEER

Counsel of Record for This
Party:

JOHN R. RYAN, ESQUIRE
Pa. I.D. #38739

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P. O. Box 131
Clearfield, PA 16830

814/765-1566

FILED

MAR 14 2001

William A. Shaw
Prothonotary

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, : No. 01 - - CD
Plaintiff :
:
Vs. :
:
ROBERT STUTMAN, ESQUIRE, :
Defendant :

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.

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
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P. O. BOX 131
CLEARFIELD, PA

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, : No. 01 - - CD
Plaintiff :
:
Vs. :
:
ROBERT STUTMAN, ESQUIRE, :
Defendant :

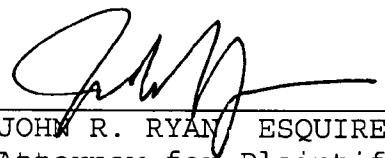
COMPLAINT

NOW COMES, Richard T. Hughes, Consulting Engineer, Plaintiff above named, and by his attorney, John R. Ryan, Esquire, files this Complaint as follows:

1. The Plaintiff is Richard T. Hughes, Consulting Engineer, an adult individual having his principal place of business at 506 Krebs Avenue, Clearfield, Pennsylvania 16830.
2. Defendant is Robert Stutman, an adult individual having a place of business at 275 Commerce Drive, Suite 304, Ft. Washington, Pennsylvania 19034.
3. During the dates of August 10, 1999, and October 8, 1999, the Plaintiff did perform engineering services for the Defendant.
4. The Plaintiff has billed the Defendant for those services in the total amount of Two Thousand Six Hundred Dollars (\$2,600.00).
5. Defendant has failed and refused to pay the balance due despite repeated demands by the Plaintiff.

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

WHEREFORE, Plaintiff demands judgment in his favor and against Defendant in the amount of Two Thousand Six Hundred Dollars (\$2,600.00), together with costs of suit and interest thereon.

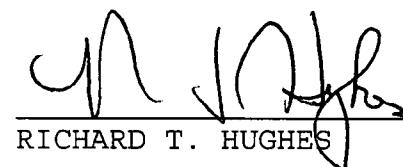


JOHN R. RYAN, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



RICHARD T. HUGHES

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.

CIVIL DIVISION

No. 01 - CD

RICHARD T. HUGHES CONSULTING
ENGINEER,

Plaintiff

vs.

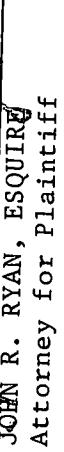
ROBERT STUTMAN, ESQUIRE,
Defendant

COMPLAINT

NOTICE TO DEFENDANT:

YOU are hereby notified
that you are required to file
an Answer to the within Complaint
within twenty (20) days after
service upon you or judgment
may be entered against you.


John R. Ryan
JOHN R. RYAN, ESQUIRE

Attorney for Plaintiff

William A. Shaw

FILED

MAR 14 2001


William A. Shaw

Prothonotary

pd. \$80.00

3cc Cathy Ryer

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING CIVIL DIVISION
ENGINEER, Plaintiff
vs.
No. 01 - 369 - CD

ROBERT STUTMAN, ESQUIRE,
Defendant

AFFIDAVIT OF SERVICE

Filed on Behalf of:

Plaintiff, RICHARD T. HUGHES
CONSULTING ENGINEER

Counsel of Record For This Party:

JOHN R. RYAN, ESQUIRE
Pa. I. D. #38739

Colavecchi, Ryan & Colavecchi
221 East Market Street
P. O. Box 131
Clearfield, PA 16830

Phone: 814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED

MAR 22 2001

William A. Shaw
Prothonotary

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, :
Plaintiff :
vs. : No. 01 - 369 - CD
ROBERT STUTMAN, ESQUIRE, :
Defendant :

AFFIDAVIT OF SERVICE

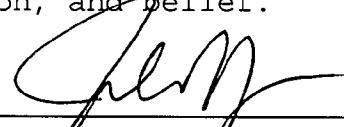
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF CLEARFIELD : ss.

Before me, the undersigned officer, personally appeared JOHN R. RYAN, ESQUIRE, who, being duly sworn according to law, deposes and says that a copy of the Complaint was mailed to Robert Stutman, Esquire, at 275 Commerce Drive, Suite 304, Ft. Washington, Pennsylvania 19034 on March 16, 2001, as shown on the certified mail receipt attached below:

Further, this Complaint was received by Robert Stutman, Esquire, on March 19, 2001 as shown on the receipt signed by S. Simon and attached below:

Richard J. Hughes	
SENDER: COMPLETE THIS SECTION	
<ul style="list-style-type: none">■ 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: Robert Stutman, Esquire 275 Commerce Drive Suite 304 Mt. Washington, PA 19034	
2. Article Number (Copy from service label) 7099 3400 0016 7883 2054	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
COMPLETE THIS SECTION ON DELIVERY	
A. Received by (Please Print Clearly)	B. Date of Delivery <u>3-19</u>
C. Signature <u>X. J. Dixon</u>	
<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952	

The above statements are true and correct to the best of affiant's knowledge, information, and belief.


JOHN R. RYAN, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

Sworn to and subscribed before me
this 21st day of March, 2001.

Margaret B. Buzzanca

NOTARIAL SEAL
MARGARET B. BUZZANCA, Notary Public
Clearfield Boro, Clearfield County, PA
My Commission Expires Nov. 23, 2001

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
No. 01-369-CD

RICHARD T. HUGHES CONSULTING
ENGINEER,
vs.

Plaintiff

ROBERT STUTMAN, ESQUIRE,
Defendant

AFFIDAVIT OF SERVICE

FILED
01/10/03
MAR 2 2003
William A. Shaw
Prothonotary

COLAVECCHI
RYAN & COLAVECCHI
ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 1311
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING
ENGINEERS,

CIVIL DIVISION

No.: 01-369-CD

Plaintiff

v.

ROBERT STUTMAN, ESQUIRE,

Defendant.

FILED

APR 09 2001

William A. Shaw
Prothonotary

**PRELIMINARY OBJECTIONS OF DEFENDANT,
ROBERT STUTMAN, ESQUIRE TO PLAINTIFF'S COMPLAINT
PURSUANT TO Pa.R.C.P. 1028(4)**

AND NOW, comes defendant, Robert Stutman, Esquire, by and through his attorney, Brian Shovlin, Esquire and files these Preliminary Objections and in support thereof avers the following:

1. The plaintiff filed a Complaint on March 14, 2001, seeking compensation for services performed during the dates of August 10, 1999 and October 8, 1999. A true and correct copy of Plaintiff's Complaint is incorporated herein and attached hereto as Exhibit "A."
2. Pennsylvania is a fact pleading jurisdiction and Pa.R.C.P. 1019 requires that the material facts which support a cause of action be stated in a concise and summary form.
3. Plaintiff's Complaint is devoid of any facts regarding the specifics of the work performed or the failure to receive payment. Plaintiff's failure to include sufficient specificity in their pleading pursuant to Pa.R.C.P. 1019 prevents defendant from properly addressing the claims presented in plaintiff's Complaint.

WHEREFORE, defendant, Robert Stutman, Esquire, respectfully requests that this Honorable Court sustain his Preliminary Objections, striking plaintiff's Complaint.

Respectfully submitted,

LAW OFFICES OF ROBERT A. STUTMAN, P.C.

By: Brian Shovlin
Brian J. Shovlin, Esquire
Attorney for Defendant

Dated: 4/6/01

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING
ENGINEER,
Plaintiff

Vs.

ROBERT STUTMAN, ESQUIRE,
Defendant

CIVIL DIVISION

No. 01 - 369 - CD

COMPLAINT

Filed on Behalf of:

Plaintiff, RICHARD T. HUGHES
CONSULTING ENGINEER

Counsel of Record for This
Party:

JOHN R. RYAN, ESQUIRE
Pa. I.D. #38739

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P. O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAR 14 2001

Attest:

William J. Ryan
Prothonotary

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, : No. 01 - - CD
Plaintiff :
:
Vs. :
:
ROBERT STUTMAN, ESQUIRE, :
Defendant :

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.

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COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, : No. 01 - - CD
Plaintiff :
:
Vs. :
:
ROBERT STUTMAN, ESQUIRE, :
Defendant :

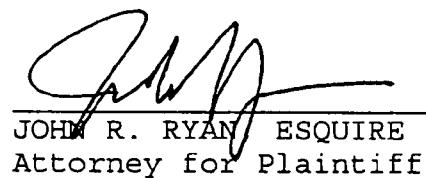
COMPLAINT

NOW COMES, Richard T. Hughes, Consulting Engineer, Plaintiff above named, and by his attorney, John R. Ryan, Esquire, files this Complaint as follows:

1. The Plaintiff is Richard T. Hughes, Consulting Engineer, an adult individual having his principal place of business at 506 Krebs Avenue, Clearfield, Pennsylvania 16830.
2. Defendant is Robert Stutman, an adult individual having a place of business at 275 Commerce Drive, Suite 304, Ft. Washington, Pennsylvania 19034.
3. During the dates of August 10, 1999, and October 8, 1999, the Plaintiff did perform engineering services for the Defendant.
4. The Plaintiff has billed the Defendant for those services in the total amount of Two Thousand Six Hundred Dollars (\$2,600.00).
5. Defendant has failed and refused to pay the balance due despite repeated demands by the Plaintiff.

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

WHEREFORE, Plaintiff demands judgment in his favor and against Defendant in the amount of Two Thousand Six Hundred Dollars (\$2,600.00), together with costs of suit and interest thereon.



JOHN R. RYAN, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



RICHARD T. HUGHES

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA
CIVIL DIVISION
NO. : 01-369-cd

RICHARD T. HUGHES CONSULTING
ENGINEER,

Plaintiff

v.

ROBERT A. STUTMAN, ESQUIRE,
Defendant

PRELIMINARY OBJECTIONS

and
BRIEF IN SUPPORT OF PO'S

Brian J. Shovlin, Esquire
LAW OFFICES OF ROBERT STUTMAN
275 Commerce Drive
Suite 304
Ft. Washington, PA 19034
(215) 283-1177

FILED

APR 09 2001
m 11:24/ nocc
William A. Shaw
Prothonotary



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

RICHARD T. HUGHES :
CONSULTING ENGINEERS :
vs. : No. 01-369-CD
ROBERT STUTMAN, ESQUIRE :
:

ORDER

AND NOW, this 21st day of January, 2004, it is the ORDER of the Court that a status conference in the above matter has been scheduled for Friday, February 6, 2004 at 10:45 A.M., in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

FILED

JAN 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

BY THE COURT:


FREDRIC J. AMMERMAN
President Judge

FILED

1CC

100-3264
JAN 2 12004

Attns: Ryan, Shovlin

JKL

William A. Shaw
Prothonotary/Clerk of Courts

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

RICHARD T. HUGHES
CONSULTING ENGINEERS,
Plaintiff

*
*
*
*

vs.

* No. 2001-369-C.D.
*

ROBERT STUTMAN, ESQUIRE,
Defendant

*

O R D E R

NOW, this 2nd day of February, 2004, it is the ORDER of this Court that Status Conference scheduled in the above matter has been continued from Friday, February 6, 2004 to **Tuesday, February 17, 2004 at 11:30 a.m.** in Courtroom No. 1, Clearfield County Courthouse, Clearfield, Pennsylvania.

By the Court,



HONORABLE FREDRIC J. AMMERMAN
President Judge

FILED

FEB 02 2004

William A. Shaw
Prothonotary

FILED

01:22 PM

FEB 02 2004



William A. Shaw
Prothonotary

✓ 2 certified copies to John R. Ryan, Esquire
✓ 2 certified copies to Brian J. Shovlin, Esquire
1 copy to Judge Ammerman
1 copy to Court Administrator

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

RICHARD T. HUGHES CONSULTING :
ENGINEERS :
vs. : No. 01-369-CD
: :
ROBERT STUTMAN, ESQUIRE :
:

O R D E R

AND NOW, this 18th day of February, 2004, it is the ORDER of the Court that argument on Preliminary Objections of Defendant in the above matter has been scheduled for Thursday, March 4, 2004 at 2:30 P.M., in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

BY THE COURT:



FREDRIC J. AMMERMAN
President Judge

FILED

FEB 18 2004

William A. Shaw
Prothonotary

FILED

010-05139-1ccatty Ryan
FEB 18 2004
1ccatty Shonlin

William A. Shaw
Prothonotary

LAW OFFICES OF ROBERT A. STUTMAN, P.C.
BY: Robert A. Stutman, Esquire
Attorney I.D. # 52872
275 Commerce Drive, Suite 304
Fort Washington, PA 19034
(215) 283-1177

Attorneys for Plaintiff

RICHARD T. HUGHES CONSULTING : COURT OF COMMON PLEAS
ENGINEERS, : CLEARFIELD COUNTY
Plaintiff, :
vs. : No. 01-369-CD
ROBERT A. STUTMAN, ESQUIRE :
Defendant. :

PRAECIPE FOR ENTRY OF APPEARANCE

Kindly enter my appearance as counsel for the Defendant, Robert A. Stutman, Esquire, for the above-referenced matter.

LAW OFFICES OF ROBERT A. STUTMAN, P.C.



Robert A. Stutman, Esquire
Attorney I.D. # 81241

Date: February 16, 2004

FILED

FEB 27 2004

William A. Shaw
Prothonotary/Clerk of Courts

LAW OFFICES OF ROBERT A. STUTMAN, P.C.

BY: Robert A. Stutman, Esquire
Attorney I.D. # 52872
275 Commerce Drive, Suite 304
Fort Washington, PA 19034
(215) 283-1177

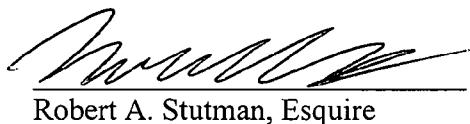
Attorneys for Plaintiff

RICHARD T. HUGHES CONSULTING	:	COURT OF COMMON PLEAS
ENGINEERS,	:	CLEARFIELD COUNTY
Plaintiff,	:	
vs.	:	No. 01-369-CD
ROBERT A. STUTMAN, ESQUIRE	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Robert A. Stutman, Esquire, hereby state that on this 16th day of February, 2004, a true and correct copy of my *Praecipe for Entry of Appearance* was sent via Airborne Express to the following counsel of record:

John R. Ryan, Esquire
Colavecchi, Ryan & Colavecchi
221 East Market Street
Clearfield, PA 16830



Robert A. Stutman, Esquire

FILED

FEB 27 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, :
Plaintiff :
: :
vs. : NO. 01 - 369 - C.D.
: :
ROBERT STUTMAN, ESQUIRE, :
Defendant :
:

AMENDED COMPLAINT

Filed on behalf of
Plaintiff

Counsel of Record for
this Party:

John R. Ryan
Attorney-At-Law

Pa. I.D. 38739

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

MAR 03 2004

William A. Shaw
Prothonotary

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

RICHARD T. HUGHES CONSULTING	:	
ENGINEER,	:	
Plaintiff	:	
vs.	:	No. 01 - 369 - C.D.
ROBERT STUTMAN, ESQUIRE,	:	
Defendant	:	

NOTICE

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Court Administrator's Office
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, Ext. 1300

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

RICHARD T. HUGHES CONSULTING	:	
ENGINEER,	:	
Plaintiff	:	
vs.	:	NO. 01 - 369 - C.D.
ROBERT STUTMAN, ESQUIRE,	:	
Defendant	:	

COMPLAINT

NOW COMES, Richard T. Hughes, Consulting Engineer., and by his Attorneys, Belin & Kubista, files his Amended Complaint and avers as follows:

1. Plaintiff is Richard T. Hughes, Consulting Engineer, an adult individual having his principal place of business at 506 Krebs Avenue, Clearfield, Pennsylvania 16830.
2. Defendant is Robert Stutman, Esquire, an adult individual having his principal place of business at 275 Commerce Drive, Suite 304, Ft. Washington, Pennsylvania 19034.
3. On or about January, 1999, Defendant engaged the services of Plaintiff to perform consulting services with regard to the collapse of a building situated in Bradford, Pennsylvania. On January 19, 1999, Plaintiff visited the building site to perform a structural inspection and subsequently provided Defendant with a written report containing his findings and conclusions. A true and correct copy of the report is attached hereto, marked Exhibit "A" and incorporated herein by reference as if set forth at length.
4. On or about July 19, 1999, Plaintiff submitted an invoice to Defendant for the above described services in the amount of \$1,200.00. A true and correct copy of the invoice

dated July 19, 1999 is attached hereto, marked Exhibit "B" and incorporated herein by reference as if set forth at length.

5. On or about July 26, 1999, Defendant engaged the services of Plaintiff to perform an investigation as to a fire which destroyed a commercial building in Cranberry Township, Pennsylvania, to determine whether the building was in conformance with Department of Labor and Industry standards for fire protection. On or about July 27, 1999, Plaintiff visited the building site accompanied by Defendant to perform the inspection. Subsequently, Plaintiff submitted a written report to Defendant, which contained his findings and conclusions. A true and correct copy of the report is attached hereto, marked Exhibit "C" and incorporated herein by reference as if set forth at length.
6. On August 25, Plaintiff issued to Defendant an invoice for his services in connection with the Cranberry Township building in the amount of \$1,2000.00. A true and correct copy of the statement dated August 25, 1999, is attached hereto, marked Exhibit "D" and incorporated herein by reference as if set forth at length.
7. Defendant has failed and refused to pay the above statements despite regular monthly billing on the part of Plaintiff. One payment was made in the amount of \$200.00.
8. At the present time, the total balance due and owing by Defendant to Plaintiff is Two Thousand Two Hundred Dollars, representing the balance owed for services rendered together.

WHEREFORE, Plaintiff demands that judgment be entered in his favor and against

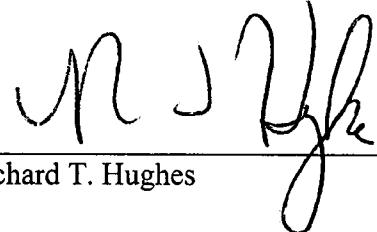
Debtors are to pay the amount of \$5,300.00, together with interest and costs of suit.

BERLIN & KUDISKA



John F. Ryan
Attorney for Plaintiff

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of Pa. C.S. 4904, relating to unsworn falsification to authorities.



Richard T. Hughes

Investigation into the Bisett Building Center Warehouse Collapse
142 Davis Street
Bradford, PA

for
Penn National Insurance Company

August 19, 1999

Richard T. Hughes, P.E.
Consulting Engineer
506 Krebs Avenue
Clearfield, Pa. 16830
(814) 765-8691

EXHIBIT "A"

1.0 INVESTIGATION

On Tuesday, January 19, 1999, a site investigation of the collapsed warehouse building was performed by Mr. Richard T. Hughes, P.E. accompanied by Mr. Jeff Hlesciak, legal counsel for Penn National Insurance Company, and also by George Gigliotti, manager of the Bisett Building Center.

The collapsed building was a one-story, timber pole building structure, 50 ft. wide and 100 ft. deep with three bearing supports; one down the center of the building and one on each of the two exterior elevations (see attached sketch and photographs). The walls were constructed out of 6 x 6 timber posts with 2 x 4 purlins and metal sheeting. The roof system was constructed out of three fabricated timber trusses, which span 25 feet to the center of the structure spaced at 4 feet on centers supporting 2 x 4 purlins spaced at 2 feet on centers and a metal deck. The building was unheated, and was enclosed on three sides with the north side open. The structure housed building supply materials such as shingles, sheathing, molding, plasterboard, and other building supplies.

On Friday, January 15, 1999, at approximately 8:45 a.m., Mr. Mark Palitmer and Mr. Jim Gleason were working around the front entrance to the building on the north side of the warehouse. Mr. Gleason had walked into the structure approximately 10 feet in the east bay when he noticed a sudden snapping and cracking in the back of the building, which was followed immediately by a successive collapse, which caused Mr. Gleason to turn and run at which time the wind pressure pushed him out of the building. The entire roof system collapsed in the east column line, pushed eastward (see attached photographs). At the time of the inspection, the roof system sustained a complete collapse onto the concrete floor slab and everything was still in its original state. A close-up inspection revealed that the east column line had pushed out approximately 2 feet out of plumb, whereas the center column line and girder line and the west column line and girder line sustained minor damages.

The prefabricated timber trusses had a 2 x 8 top cord and a 2 x 6 bottom cord with 2 x 4 webbing. The bottom cord had two intermediate splices which were connected by steel press plates. The snow on the roof, at the time of my inspection, measured 12 inches with 1 inch of ice. The obvious point of failure was where the 2 x 4 compression members were knotted and slender. It is at this location where both bays collapsed with the east bay collapsing first as described by Mr. Gleason. At the time of the inspection, snow covered 95% of the superstructure framing and it was difficult to observe. The men on site were instructed to expose the bottom cords splices and webbing for future inspection.

It should be noted that in this region of Pennsylvania, a ground snow load of 40 lb. per square ft. is expected, which would be equivalent to a 28 lb. per square ft. roof liveload necessary to be supported by superstructures (see attached). The one inch of ice (5.2 psf) and 12 inches of snow (10 psf) on the roof total approximately 15 psf.

The structure was built in 1986 and survived both the severe winters of 1994 and 1996, which had snow levels in excess of 2 feet. Snow has never been removed off of the roof system prior to this event or other events, and it was noted that two trusses were damaged in the front of the building, directly underneath where Mr. Gleason was standing, several years ago and were repaired by scissoring two 2 x 6's to the bottom cord. Mr. Gleason indicated that this is not the location where the collapse occurred, but rather at the back of the building southeast bay.

Photographs of the construction of the building were supplied by Bissett. The photos reveal bracing of the diagonal, but not the vertical compression members, tension members and the condition of the lumber

Finally, structural calculations were performed on the truss system using RISA structural analysis frame program. A 40 psf snow load with a 70% actual roof load was used on the trusses, which were spaced at 4'-c-c. The results revealed that member 24, which was the long 2 x 4 vertical member had a compression stress of 1,390 lbs. Observation of the 2 x 4's used in this member revealed many low grade pieces which lacked sufficient lateral bracing. Calculations reveal that the vertical #24 member would require two braces to support the axial loads under required loads (see attached calculations).

2.0 CONCLUSIONS

Based on the physical evidence at the site, a review of the snow loads, a review of the structural analysis of the prefabricated timber trusses, a review of the construction photographs, plus my experience with other timber truss failures, it is my professional opinion with a high degree of engineering certainty that:

1. The cause of the failure was a combination of lack of lateral bracing on the vertical 2 x 4 web members combined with low grade lumber (see attached photos);
2. The snow loads on the building roof (15 psf) did not exceed the required snow loads (28 psf) that can be expected in this region of Pennsylvania, yet the roof system failed;
3. The building failed due to lateral buckling of a poorly braced vertical compression members which consisted of low grade material. The stress in the compression member at failure was 141 psi and the member was designed to carry 264 psi, yet only had a capacity of 58.5 psi due to slenderness. This under-design was in violation of the American Institute for Timber Construction, AITC, the BOCA Code and the National Design Specification, NDS.
4. The grade of the lumber that was used for both the top and bottom cords was adequate, but the material selection for webbing was poor and two braces would be necessary for even high grade lumber.

3.0 REFERENCES

4.0 VITAE

Richard T. Hughes, P.E.

Consulting Engineer
506 Krebs Avenue
Clearfield, Pa 16830

Invoice

DATE	INVOICE #
8/19/99	99-184

BILL TO
Mr. Robert Stutman 275 Commerce Drive Suite 304 Ft. Washington, PA 19034

P.O. NO.	TERMS	TAX ID# 164-54-0895
99-184	Net 30	

ITEM	DESCRIPTION	AMOUNT
1	For the structural investigation including analysis and report with regards to the Bissett Building collapse, Bradford, PA.	1,200.00
It's been a pleasure working with you!		Total
		\$1,200.00

EXHIBIT "B"

Investigation into the Fire Loss

at the

Rectinwald Brothers Construction Company Facility
Cranberry Twp, PA

for

August 25, 1999

Richard T. Hughes, P.E.
Consulting Engineer

506 Krebs Avenue
Clearfield, Pa. 16830
(814) 765-8691

EXHIBIT "C"

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2.0 INVESTIGATION.....	2
3.0 CONCLUSIONS.....	3
4.0 REFERENCES	4
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SUMMARY

On July 26, 1999, a fire broke out at the Rectinwald Brothers Construction Company Facility located in Cranberry Twp, PA, resulting in a complete loss of the structure.

The results of this investigation revealed that the fire protection of the warehouse, which was completed in 1996, was in violation of Labor and Industry requirements for a manufacturing facility.

1.0 BACKGROUND

On July 26, 1999, a fire broke out at the Rectinwald Brothers Construction Company's office and warehouse facility located in Cranberry Twp., PA, resulting in a complete loss of the structure.

The origin of the fire was determined to be in the paint booth area where an employee was attempting to mix paint at which time it spilled and ignited by a nearby gas hot water heater. The fire then spread into the front offices and then into the rear of the building where the facility was used as a lumber molding fabrication area (see attached plan).

On July 26, 1999, Mr. Robert Stutman, legal counsel for the insurance company, retained the services of Mr. Richard T. Hughes, P.E., to determine if the original building, which was constructed in 1996, was in conformance with the Department of Labor and Industry for fire protection, and if it was not, would correct fire protection have prevented the spread of the fire.

As part of my investigation, a copy of the permit plans were supplied.

2.0 INVESTIGATION

On Tuesday, July 27, 1991, a site inspection of the premises was performed by Mr. Richard T. Hughes, P.E. and accompanied by Mr. Robert Stutman and the owner of the building, Mr. Art Rectinwald.

The facility in question is a one-story concrete slab on grade warehouse in the rear of the facility with a two-story office complex in the front (see attached drawings). The fire broke out in the back part of the building and spread throughout the facility, resulting in a total loss. The approximate area of the facility is 10,000 square feet including the office spaces.

Mr. Rectinwald retained Mr. Clark Wallace, AIA, of Zelienople to develop the building plans for permit approval. Mr. Rectinwald stated that Mr. Wallace visited his existing facility prior to developing these plans and was familiar with his operations.

A close-up inspection revealed that the facility was not originally built with a sprinkler system, yet a paint booth and dust producing manufacturing of molding was what the space was used for. A review of the approved Labor and Industry plans revealed that the paint booth area and storage area for the paint were not drawn on the approved permit drawings.

A review of the local building permit at the Cranberry Twp. Center was performed at which time we met with Mr. Jeffery Winkle. The drawings revealed that exhaust fans were located directly over the paint booths, yet the paint booths were not drawn into the facility. The paint booth walls were not on the primitive drawings.

3.0 CONCLUSIONS

Based on the physical evidence at the site, a review of the Labor and Industry plans, which were developed by Mr. Clark Wallace, plus my experience with other facilities such as this, it is my professional opinion to a high degree of engineering certainty that:

1. No sprinkler system was provided in this building, which is a dust producing manufacturing facility;
2. The architect who designed the facility was aware of the operations having visited the previous location of this facility;
3. The architect elected not to show the sprinkler system, but was aware of the proposed activity;
4. The Department of Labor and Industry has strict regulations with regards to use of sprinkler systems in facilities such as storage warehouses and manufacturing facilities which create dust. Furthermore, facilities which use paint booths also require sprinkler systems and various fire protection devices, which were not provided in this building, such as fire separation walls (see attached);
5. The disregard for the fire protection system in this building was a contributing cause to the spread of the fire and the complete loss of this facility. If the sprinkler system would have been in place and operating, the fire could have been contained to an approximately 200 square foot area instead of the 10,000 square foot. By showing the exhaust fans on the plans and not labeling the facility as a manufacturing and painting area is a disregard for the safety and a direct result of the loss in this structure.

5.0 VITAE

Richard T. Hughes, P.E.

Consulting Engineer
506 Krebs Avenue
Clearfield, Pa 16830

Invoice

DATE	INVOICE #
8/25/99	99-193

BILL TO

Mr. Robert Stutman
275 Commerce Drive
Suite 304
Ft. Washington, PA 19034

P.O. NO.	TERMS	TAX ID# 164-54-0895
99-193	Net 30	

ITEM	DESCRIPTION	AMOUNT
1	With regards to the Rectinwald Brothers Construction Company.	
1	Investigation into previous Labor and Industry permits to the fire loss building--6.5 hrs. @ \$80/hr.	520.00
1	Report preparation and review --dated August 25, 1999-- 8 hrs. @ \$80/hr.	640.00
1	Secretarial Services 2 hrs. @ \$20/hr.	40.00
It's been a pleasure working with you!		
		Total \$1,200.00

EXHIBIT "D"

FILED

3/20/04

MAR 03 2004

o/ 2:54 P.M.

William A. Shaw
Prothonotary

3 CC TO ATTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING
ENGINEERS,

CIVIL DIVISION

No.: 01-369-CD

Plaintiff

v.

ROBERT STUTMAN, ESQUIRE,

Defendant.

ORDER

AND NOW, this ____ day of _____, 2001, upon consideration of defendant, Robert Stutman, Esquire's Preliminary Objections to Plaintiff's Complaint and any response thereto, it is hereby ORDERED and DECREED that said Preliminary Objections are SUSTAINED and plaintiff's Complaint is hereby stricken.

BY THE COURT:

J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RICHARD T. HUGHES CONSULTING	:	CIVIL DIVISION
ENGINEERS,	:	
	:	No.: 01-369-CD
Plaintiff	:	
	:	
v.	:	
	:	
ROBERT STUTMAN, ESQUIRE,	:	
	:	
Defendant.	:	

ORDER

AND NOW, this ____ day of _____, 2001, upon consideration of defendant, Robert Stutman, Esquire's Preliminary Objections to Plaintiff's Complaint and any response thereto, it is hereby ORDERED and DECREED that said Preliminary Objections are SUSTAINED and plaintiff's Complaint is hereby stricken.

BY THE COURT:

J.

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, :
Plaintiff :
vs. : NO. 01 - 369 - C.D.
: :
ROBERT STUTMAN, ESQUIRE, :
Defendant :
:

CERTIFICATE OF SERVICE

Filed on behalf of
Plaintiff

Counsel of Record for
this Party:

John R. Ryan
Attorney-At-Law

Pa. I.D. 38739

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

MAR 05 2004

William A. Shaw
Prothonotary

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

RICHARD T. HUGHES CONSULTING :
ENGINEER, :
Plaintiff :
vs. : NO. 01 - 369 - C.D.
: :
ROBERT STUTMAN, ESQUIRE, :
Defendant :
:

CERTIFICATE OF SERVICE

This is to certify that I have served a certified copy of an Amended Complaint filed on behalf of Plaintiff in the above captioned matter to the following party by postage prepaid first-class United States mail, on the 4th day of March, 2004:

Thomas Paolini, Esquire
Law Offices of Robert A. Stutman, P.C.
339A Route 73 North
West Berlin, NJ 08091
Attorney for Defendant

BELIN & KUBISTA



John R. Ryan
Attorney for Plaintiff

STUTMAN
LAW OFFICES OF ROBERT A. STUTMAN, P.C.

275 Commerce Drive
Suite 304
Ft. Washington
Pennsylvania 19034

* * * UNITED STATES POSTAGE
156 2613 \$ 00 340 PB 8609425
4393 FORT WASHINGTON PA 19034

Brian J. Shovlin, Esquire
Law Offices of Robert A. Stutman, P.C.
275 Commerce Drive, Suite 304
Ft. Washington, PA 19034

FILED

0 10:30 AM 2004
MAR 05 2004
WAS

William A. Shaw
Prothonotary

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

RICHARD T. HUGHES,
Consulting Engineer,
Plaintiff

*
*
*
*

vs.

* NO. 2001-369-C.D.
*
*

ROBERT STUTMAN, ESQUIRE,
Defendant

*

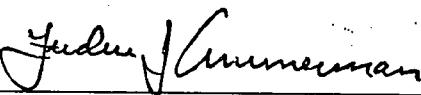
O R D E R

NOW, this 3rd day of March, 2004, counsel for the parties having advised the Court that the parties have reached an agreement with respect to the disposition of the Preliminary Objections of the Defendant and Argument on Defendant's Preliminary Objections scheduled for Thursday, March 4, 2004 is no longer necessary, therefore, it is the ORDER of this Court that said Argument scheduled in the above captioned action be and is hereby cancelled. Counsel for Plaintiff and the Defendant shall have no more than twenty (20) days from the date of this Order to present the appropriate settlement document to the Court.

By the Court,

FILED

MAR 05 2004



FREDRIC J. AMMERMAN
PRESIDENT JUDGE

William A. Shaw
Prothonotary

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET

CARL A. BELIN, JR.
 KIMBERLY M. KUBISTA
 JOHN R. RYAN

P. O. BOX 1
 CLEARFIELD, PENNSYLVANIA 16830

CARL A. BELIN
 1901-1997
 AREA CODE 814
 TELEPHONE 765-6972
 FAX (814) 765-9893

March 3, 2004

The Honorable Fredric J. Ammerman
 Clearfield County Courthouse
 230 East Market Street
 Clearfield, PA 16830

**RE: Richard T. Hughes Consulting Engineer
 vs. Robert Stutman, Esquire
 No. 01-369-C.D.**

Dear Judge Ammerman:

The parties in the above matter have reached an agreement with respect to the disposition of the Preliminary Objections of the Defendant. On behalf of the Plaintiff, I will be filing a first Amended Complaint. The Defendant will withdraw his Preliminary Objections.

For this reason, argument on those Objections will not be necessary. Therefore, you may remove Oral Argument from your schedule on March 4, 2004, at 2:30 p.m..

Attached is a copy of correspondence from defense counsel confirming this understanding.

Very truly yours,

BELIN & KUBISTA



John R. Ryan

JRR/kdm

Attachment

cc: Richard T. Hughes
 Thomas Paolini, Esquire

VIA FACSIMILE ONLY (814) 765-6089



Thomas Paolini
paolini@stutmanlaw.com

<i>Reply to</i>	<i>Office in</i>
399 A Route 73 North	St. Washington, PA
West Berlin	West Berlin, NJ
New Jersey 08091	New York, NY
p (856) 767-6800	Hartford, CT
f (856) 767-6810	(888) 579-1144

Thomas Paolini
Managing Attorney

March 3, 2004

VIA TELEFAX (814) 765-9893

John Ryan, Esquire
Belin & Kubista
P.O. Box 1
Clearfield, PA 16830

Re: Richard Hughes v. Robert Stutman

Dear Mr. Ryan:

This will confirm that the defendant has agreed to withdraw his preliminary objections and that you have agreed to file an amended complaint within ten (10) days. This also will confirm that you will notify the Court of our Agreement.

Thank you for your attention to this matter. If you have any questions, please feel free to give me a call.

Very truly yours,

Thomas Paolini

TP:ncl

正

FILED **STATEMENT**
O 2:51 NO **SECURE** **REGAN**
2000 REGAN

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William A. Shaw
Prothonotary

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

RICHARD T. HUGHES :
CONSULTING ENGINEER, :
Plaintiff :
: :
vs. : NO. 01 - 369 - C.D.
: :
ROBERT STUTMAN, ESQUIRE, :
Defendant :
: :

**PRAECIPE TO SETTLE,
DISCONTINUE AND END**

Filed on behalf of
Plaintiff

Counsel of Record for
this Party:

John R. Ryan
Attorney-At-Law

Pa. I.D. 38739

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

JUN 10 2004

William A. Shaw
Prothonotary

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

RICHARD T. HUGHES :
CONSULTING ENGINEER, :
Plaintiff :
: :
vs. : NO. 01 - 369 - C.D.
: :
ROBERT STUTMAN, ESQUIRE, :
Defendant :
:

PRAECIPE

TO: WILLIAM SHAW, PROTHONOTARY

Please mark the above-captioned case settled, discontinued
and ended.

BELIN & KUBISTA



John R. Ryan
Attorney for Plaintiff

FILED
08:40 AM 10 JUN 2004
Court of Common Pleas
Copy to CJA
JUN 10 2004

William A. Shaw
Prothonotary

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

CIVIL DIVISION

Richard T. Hughes Consulting Engineers

Vs.
Robert Stutman Esq **No. 2001-00369-CD**

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on June 10, 2004, marked:

Discontinued, settled and ended.

Record costs in the sum of \$\$80.00 have been paid in full by Attorney.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 10th day of June A.D. 2004.

William A. Shaw, Prothonotary