

01-392-CD
TRAVELERS INDEMNITY COMPANY et al -vs- SHAWN WITHERITE et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TRAVELERS INDEMNITY COMPANY
and TRAVELERS PROPERTY CASUALTY
CORP. as Subrogee of SAM KULA
and
SAM KULA, in his own right

01-392-C

vs.

SHAWN WITHERITE and BRANDY WITHERITE

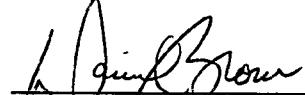
236 NOTICE

NOTICE IS GIVEN THAT A JUDGMENT IN THE ABOVE CAPTIONED MATTER HAS BEEN ENTERED AGAINST YOU.



PROTHONOTARY

IF YOU HAVE ANY QUESTIONS CONCERNING THE ABOVE,
PLEASE CONTACT:



#59638
Signature ID Number

Daniel M. Brown, Esquire

Francis R. Gartner & Associates

Union Meeting, III, Suite III

960-B Harvest Drive

Blue Bell, PA 19422-1969

(215) 619-4346

FILED

MAR 19 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TRAVELERS INDEMNITY COMPANY and TRAVELERS PROPERTY CASUALTY CORP. as Subrogee of SAM KULA and SAM KULA, in his own right	:	COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
VS.	:	NO.
SHAWN WITHERITE and BRANDY WITHERITE, h/w	:	

PRAECIPE FOR JUDGMENT

To the Prothonotary:

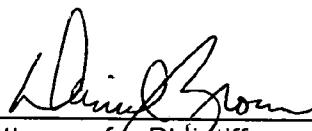
Enter judgment in favor of Plaintiffs and against: Defendants, Shawn Witherite and Brandy Witherite. Pursuant to the attached certified District Justice Judgment.

(X) Assess Damages as Follows: \$ 5,564.77

Total \$ 5,564.77

Plus interest, costs and attorney's fees

I CERTIFY THAT THE FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT. I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1.



Attorney for Plaintiff

Daniel M. Brown, Esquire/ #59683
Print/Type Name and ID Number

(215) 619-4346
Phone Number

This 19th day of March, 2001, judgment is entered in favor of Plaintiff and against Defendants, Shawn Witherite and Brandy Witherite, by default for want of an answer, pursuant to the District Justice Judgment and damages assessed in the sum of \$ 5,564.77 as per the above certification.



Prothonotary, Clearfield County

LAW OFFICES
FRANCIS R. GARTNER & ASSOCIATES
BY: DANIEL M. BROWN, ESQUIRE
IDENTIFICATION NO: 59683
UNION MEETING III, SUITE 215
960 B HARVEST DRIVE
BLUE BELL, PA 19422
(215) 619-4322

Attorney for Plaintiffs

TRAVELERS INDEMNITY COMPANY : COURT OF COMMON PLEAS
and TRAVELERS PROPERTY CASUALTY : CLEARFIELD COUNTY, PENNSYLVANIA
CORP. as Subrogee of SAM KULA :
and :
SAM KULA, in his own right : NO.
vs. :
SHAWN WITHERITE and BRANDY WITHERITE, h/w :

CERTIFICATE OF ADDRESSES

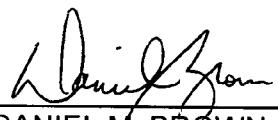
COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF MONTGOMERY :

I, Daniel M. Brown, Esquire, hereby certify that to the best of my knowledge, information and belief the following are the correct addresses for plaintiff and defendant(s):

Plaintiffs: Travelers Indemnity Company and Travelers
Property Casualty Corp., as Subrogee of Sam Kula
P.O. Box 12647
Reading, PA 19612

Sam Kula, in his own right
P.O. Box 34
Olanta, PA 16863

Defendants: Shawn Witherite and Brandy Witherite, h/w
RR#2 Box 41-A
Curwensville, PA 16833



DANIEL M. BROWN, ESQUIRE

LAW OFFICES
FRANCIS R. GARTNER & ASSOCIATES
BY: DANIEL M. BROWN, ESQUIRE
IDENTIFICATION NO: 59683
UNION MEETING III, SUITE 215
960 B HARVEST DRIVE
BLUE BELL, PA 19422
(215) 619-4322

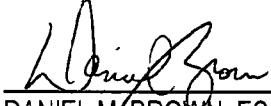
Attorney for Plaintiffs

TRAVELERS INDEMNITY COMPANY : COURT OF COMMON PLEAS
and TRAVELERS PROPERTY CASUALTY : CLEARFIELD COUNTY, PENNSYLVANIA
CORP. as Subrogee of SAM KULA :
and :
SAM KULA, in his own right : NO.
vs. :
SHAWN WITHERITE and BRANDY WITHERITE, h/w :

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF MONTGOMERY :

Daniel M. Brown, Esquire, being duly sworn according to law, deposes and says that he is an officer of the plaintiffs; that he is authorized to make this affidavit on behalf of the plaintiffs; that the above-named Defendants are of legal age; the address of the Defendants are RR#2 Box 41-A, Curwensville, Pennsylvania 16833; Occupation of the defendants are unknown; and Defendants are not in the Military Service of the United States, nor any State or Territory thereof or its allies as defined in the Soldier's and the Sailors' Civil Relief Act of 1940 and the amendments thereto.



DANIEL M. BROWN, ESQUIRE
Attorney for Plaintiffs

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

Notarial Seal
Renée A. Coshin, Notary Public
Whitpain Twp., Montgomery County
My Commission Expires July 2, 2001

Member, Pennsylvania Association of Notaries



Renée A. Coshin
Notary Public

COMMONWEALTH OF PENN^{sylvania}
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-02

DJ Name: Hon.

RICHARD A. IRELAND
Address: **650 LEONARD STREET**
CLEARFIELD, PA

Telephone: **(814) 765-5335** 16830

RICHARD A. IRELAND
650 LEONARD STREET
CLEARFIELD, PA 16830

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

NAME and ADDRESS
TRAVELERS INDEMNITY CO FOR SAM KULA
PO BOX 12647
READING, PA 19612

DEFENDANT:

NAME and ADDRESS
WITHERITE, SHAWN, ET AL.
RR2, BOX 41-A
CURWENSVILLE, PA 16833

Docket No.: **CV-0000383-00**
Date Filed: **7/27/00**



THIS IS TO NOTIFY YOU THAT:

Judgment:

DEFAULT JUDGMENT PLTF

Judgment was entered for: (Name) **TRAVELERS INDEMNITY CO FOR SAM**

Judgment was entered against: (Name) **WITHERITE, BRANDY**

in the amount of \$ **5,564.77** on: (Date of Judgment) **8/28/00**

Defendants are jointly and severally liable. (Date & Time) _____

Damages will be assessed on: _____

This case dismissed without prejudice. _____

Amount of Judgment Subject to Attachment/Act 5 of 1996 \$ _____

Levy is stayed for _____ days or generally stayed. _____

Objection to levy has been filed and hearing will be held: _____

Amount of Judgment	\$ 5,432.72
Judgment Costs	\$ 132.05
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$ 5,564.77
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
=====	
Certified Judgment Total \$ _____	

Date:	Place:
Time:	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

8:28:00 Date _____, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

10:26:00 Date _____, District Justice

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: CLEARFIELD

Mag. Dist. No.:

46-3-02

DJ Name: Hon.

RICHARD A. IRELAND
Address: 650 LEONARD STREET
CLEARFIELD, PA

Telephone: (814) 765-5335 16830

RICHARD A. IRELAND
650 LEONARD STREET
CLEARFIELD, PA 16830

NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

PLAINTIFF:

TRAVELERS INDEMNITY CO FOR SAM KULA
PO BOX 12647
READING, PA 19612

NAME and ADDRESS

DEFENDANT:

WITHERITE, SHAWN, ET AL.
RR2, BOX 41-A
CURWENSVILLE, PA 16833

NAME and ADDRESS

Docket No.: CV-0000383-00
Date Filed: 7/27/00



THIS IS TO NOTIFY YOU THAT:

Judgment:

DEFAULT JUDGMENT PLTF

Judgment was entered for: (Name) TRAVELERS INDEMNITY CO FOR SAM

Judgment was entered against: (Name) WITHERITE, SHAWN

in the amount of \$ 5,564.77 on: (Date of Judgment) 8/28/00

Defendants are jointly and severally liable. (Date & Time) _____

Damages will be assessed on: _____

This case dismissed without prejudice. _____

Amount of Judgment Subject to
Attachment/Act 5 of 1996 \$ _____

Levy is stayed for _____ days or generally stayed.

Objection to levy has been filed and hearing will be held: _____

Amount of Judgment	\$ <u>5,432.72</u>
Judgment Costs	\$ <u>132.05</u>
Interest on Judgment	\$ <u>.00</u>
Attorney Fees	\$ <u>.00</u>
Total	\$ <u>5,564.77</u>

Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____

Certified Judgment Total \$ _____

Date:

Place:

Time:

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

8-28-00 Date La Delle, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

10-26-00 Date La Delle, District Justice

FILED Atty Brown
pd. 20.00
11/45-81
MAY 12 2001
Notice (cc. of entire filing)
William A. Shaw
Prothonotary
Statement to Atty (PSS)

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Travelers Indemnity Company
Plaintiff(s)

No.: 2001-00392-CD

Real Debt: \$5,564.77

Atty's Comm:

Vs. Costs: \$

Int. From:

Shawn Michael Witherite
Brandy Kay Witherite
Defendant(s)

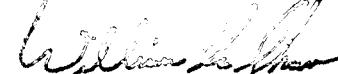
Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: March 19, 2001

Expires: March 19, 2006

Certified from the record this 19th day of March, 2001.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

COPY

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

Travelers Indemnity Company and
Travelers Property Casualty Corp. as
Subrogee of Sam Kula and
Sam Kula in his own right
Plaintiff(s)

Docket:

No.: 2001-00392-CD

Real Debt: \$5,564.77

Atty's Comm:

Vs.

Costs: \$

Int. From:

Shawn Michael Witherite and
Brandy Kay Witherite
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: March 19, 2001

Expires: March 19, 2006

Certified from the record this 20th day of March, 2001.



William A. Shaw

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt,
Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TRAVELERS INDEMNITY COMPANY
and TRAVELERS PROPERTY CASUALTY
CORP. as Subrogee of SAM KULA
and
SAM KULA, in his own right

vs.

SHAWN WITHERITE and BRANDY WITHERITE, h/w

COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 01-392-CD

PRAECIPE FOR CERTIFICATION OF MOTOR VEHICLE JUDGMENT

TO THE PROTHONOTARY:

KINDLY CERTIFY THE ATTACHED JUDGMENT WHICH WAS ENTERED ON

AUGUST 28, 2000.



Attorney for Plaintiff

Daniel M. Brown, Esquire/ #59683
Print/Type Name and ID Number

(215) 619-4346

Phone Number



Prothonotary, Clearfield County

FILED

MAY 08 2001

William A. Shaw
Prothonotary

DL-201 (12-93)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

CERTIFICATION OF
MOTOR VEHICLE JUDGMENT

COURT INFORMATION	
COURT	Common Pleas
COUNTY	Clearfield
NUMBER	2001-00392-CD
YEAR	2001

TO THE SECRETARY OF TRANSPORTATION

This is to certify that on March 19, 2001 a judgment for \$ 5,564.77 plus \$ — (AMOUNT) was entered against the following: (COST)

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

COPY

NAME			SEX	DATE OF BIRTH			
FIRST Brandy	MIDDLE	LAST Witherite	F	01	10	73	
ADDRESS							
RR2, Box 41A							
CITY		STATE	ZIP CODE	SOCIAL SECURITY NUMBER			
Curwensville		PA	16833	1	6	4	- 5 8 - 3 3 0 8
DRIVER NUMBER		STATE	DATE OF ACCIDENT			CLAIM NUMBER	
		PA	07/23/1998				

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Travelers Indemnity Company and Travelers
~~Indemnity Company a/s/o Sam Kula~~
(NAME)

1105 Berkshire Boulevard

(STREET ADDRESS)

Wyomissing, PA 19610

(CITY & STATE)

(ZIP)

(610) 371-3711

(TELEPHONE NUMBER)

ATTORNEY FOR THE JUDGMENT
CREDITOR (If applicable)

Daniel M. Brown, Esquire
(NAME)

Union Meeting III, Suite 215
960-B Harvest Drive

(STREET ADDRESS)

Blue Bell, PA 19422

(CITY & STATE)

(ZIP)

(215) 619-4346

(TELEPHONE NUMBER)

THE ABOVE MENTIONED JUDGMENT AROSE FROM A MOTOR VEHICLE ACCIDENT. SIXTY DAYS HAVE ELAPSED SINCE THE ENTRY OF SAID JUDGMENT, AND THE SAME HAS NOT BEEN SATISFIED OF RECORD AND NO APPEAL HAS BEEN TAKEN THEREFROM.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of May 8, 2001


(SIGNATURE OF CLERK OR JUDGE OF THE
COURT IN WHICH THE JUDGMENT WAS RENDERED)

SEAL

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

SEND THIS Bureau of Driver Licensing, P.O. Box 60037,
FORM TO: Harrisburg, Pennsylvania 17106-0037

FILED

MAY 08 2001

MAR 07 2001

William A. Shaw
Prothonotary

Brown
P.O. #60

Cont. to ~~PA~~ ~~PA~~
Harrisburg

First
Resubmitted to (post) Harrisburg
3/29/01

DL-201 (12-93)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

COURT INFORMATION	
COURT	Common Pleas
COUNTY	Clearfield
NUMBER	2001-00392-CD
YEAR	2001

TO THE SECRETARY OF TRANSPORTATION

This is to certify that on March 19, 2001 a judgment for \$ 5,564.77 plus \$ - (AMOUNT) was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME			SEX	DATE OF BIRTH		
FIRST Shawn	MIDDLE	LAST Witherite	M	MONTH 03	DAY 18	YEAR 72
ADDRESS						
RR2, Box 41A						
CITY		STATE	ZIP CODE	SOCIAL SECURITY NUMBER		
Curwensville		PA	16833	-	-	-
DRIVER NUMBER		STATE	DATE OF ACCIDENT		CLAIM NUMBER	
226 30 622		PA	07/23/1998			

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Travelers Indemnity Company and Travelers
Property Casualty Corp. a/s/o Sam Kula
(NAME)

1105 Berkshire Boulevard

(STREET ADDRESS)

Wyomissing, PA 19610

(CITY & STATE)

(ZIP)

(610) 371-3711

(TELEPHONE NUMBER)

ATTORNEY FOR THE JUDGMENT

CREDITOR (If applicable)

Daniel M. Brown, Esquire

(NAME)

Union Meeting III, Suite 215
960-B Harvest Drive, Suite

(STREET ADDRESS)

Blue Bell, PA 19422

(CITY & STATE)

(ZIP)

(215) 619-43

(TELEPHONE NUMBER)

THE ABOVE MENTIONED JUDGMENT AROSE FROM A MOTOR VEHICLE ACCIDENT. SIXTY DAYS HAVE ELAPSED SINCE THE ENTRY OF SAID JUDGMENT, AND THE SAME HAS NOT BEEN SATISFIED OF RECORD AND NO APPEAL HAS BEEN TAKEN THEREFROM.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of May 8 2001


(SIGNATURE OF CLERK OR JUDGE OF THE
COURT IN WHICH THE JUDGMENT WAS RENDERED)

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2002

(TYPE OR PRINT NAME)
Clearfield Co. Clearfield, PA.

SEAL

SEND THIS Bureau of Driver Licensing, P.O. Box 60037,
FORM TO: Harrisburg, Pennsylvania 17106-0037