

01-617-CD
ALTURAMATS, INC. -vs- DOUGLAS DRILL
SERVICES, INC.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ALTURNAMATS, INC. : CIVIL ACTION - LAW
Plaintiff : No. 617 - 2001 - CD
v. :
DOUGLAS DRILL SERVICES, INC., : TYPE OF CASE: CIVIL
Defendant : TYPE OF DOCUMENT:
: Complaint
: FILED ON BEHALF OF:
: Alturnamats, Inc.
: COUNSEL OF RECORD FOR THIS PARTY:
: Richard W. Kooman, II
: Supreme Court No. 15493
: The Kooman Law Firm
: Marianne Professional Center
: P.O. Box 700
: Clarion, PA 16214
: (814) 226-9100

jc:0990a
#18993

FILED

APR 30 2001

William A. Shaw
Prothonotary

ALTURNAMATS, INC., : IN THE COURT OF COMMON PLEAS OF
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
v. : CIVIL ACTION - LAW
: :
DOUGLAS DRILL SERVICES, INC., :
Defendant : No. 617 - 2001 - CD

NOTICE TO DEFEND

TO: DOUGLAS DRILL SERVICES, INC.
TR 678 Graham Station
P.O. Box 77
Philipsburg, PA 16866

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 Civil 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 Civil Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
ONE NORTH SECOND STREET
CLEARFIELD, PA 16830
(814) 765-2641 Ext. 50-51

ALTURNAMATS, INC., : IN THE COURT OF COMMON PLEAS OF
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
v. : CIVIL ACTION - LAW
: :
DOUGLAS DRILL SERVICES, INC., :
Defendant : No. _____ - 2001

CIVIL COMPLAINT

The plaintiff, ALTURNAMATS, INC., by and through its attorney, Richard W. Kooman, II, brings this civil complaint on a cause of action the following of which is a statement:

1. The plaintiff, Alturnamats, Inc., is a Pennsylvania corporation with a business address of P.O. Box 344, Titusville, Crawford County, Pennsylvania.

2. The defendant, Douglas Drill Services, Inc., is a Pennsylvania corporation with a registered address of TR 678 Graham Station, P.O. Box 77, Philipsburg, Clearfield County, Pennsylvania.

3. The plaintiff, upon oral request of the defendant, has sold and delivered various ground cover mats to the defendant on an open account. Since opening the account, any items returned for credit and any payments received without specific designation by the defendant as to the invoice to be credited, have been applied to the balance of the open account as provided by law.

4. The plaintiff, upon oral request of the defendant, sold and delivered to the defendant on said open account certain ground cover mats for which payment has not been made by the defendant. The date and the amount of each transaction is set forth on a photostatic copy of the account card maintained by the plaintiff

for the defendant marked Exhibit "A", attached hereto and made a part hereof. Copies of the invoices for materials and services listed on the account card are marked Exhibits "B-1" through "B-19" and are attached to and made a part of this complaint.

5. The prices charged the defendant are fair and equitable and are the prices specifically agreed upon by the plaintiff and defendant.

6. The balance owed the plaintiff since March 16, 2001 is \$50,264.09.

7. The plaintiff has requested the defendant to pay it the sum of \$50,264.09, but the defendant has refused and continues to refuse to pay the plaintiff.

WHEREFORE, the plaintiff, Alturnamats, Inc., demands judgment against the defendant, Douglas Drill Services, Inc., in the amount of \$50,264.09 together with interest at the legal rate of six (6%) percent per annum from March 16, 2001.

Respectfully submitted,

By 
RICHARD W. KOOMAN, II, ESQUIRE
Attorney for Plaintiff
Marianne Professional Center
P.O. Box 700
Clarion, PA 16214
(814) 226-9100

jc:0989a
#18993

ACCOUNTING CARD

<u>Date</u>	<u>Invoice No.</u>	<u>Amount</u>	<u>Payment</u>	<u>Balance</u>
12/06/1999	99313	\$10,366.16	\$10,336.16	\$ 30.00
07/28/2000	00-277	1,732.65	1,156.41	576.24
08/11/2000	00-282	12,000.00		12,576.24
08/11/2000	00-283	510.50		13,086.74
08/11/2000	00-287	1,510.85		14,597.59
08/25/2000	00-300	601.42		15,199.01
09/29/2000	00-340	687.11		15,886.12
10/23/2000	00-367	1,090.07		16,976.19
11/14/2000	00-394	5,259.44		22,235.63
11/20/2000	00-413	1,470.00		23,705.63
11/27/2000	00-425	750.00		24,455.63
11/27/2000	00-426	1,605.13		26,060.76
11/27/2000	00-427	1,612.21		27,672.97
01/12/2001	00-478	18,000.00		45,672.97
02/05/2001	01-36	496.42		46,169.39
02/02/2001	01-40	540.58		46,709.97
02/15/2001	01-81	1,365.66		48,075.63
02/23/2001	01-100	504.25		48,579.88
03/16/2001	01-147	1,684.21		50,264.09

jc:0988a
#18993

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

12/6/199 99313

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

GROUNDWATER SUPPLY COMPANY
227 LEO MINSTER ROAD
STERLING, MA 01564
978-422-3209

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
17491	NET 30		11/19/19	ESTES	TITUSVILLE PA	11/10/99
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS FREIGHT	GROUND COVER MAT - 4'X8' FREIGHT - PRE-PAID AND ADDED MERCHANDISE SUBTOTAL			80	120.00 766.16	9,600.00 766.16 10,366.16

SHIP 12 - 4' X 8' ALTURNAMATS
ON 11/12/99

SHIP 68 - 4' X 8' ALTURNAMATS
ASAP OR NO LATER THAN
11/19/99

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$10,366.16

ALTURAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
7/28/200	00-277

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

JONES DRILLING
3570 FREEDOM WAY
HUBERT, NC 28539

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30106	NET 30		7/27/200	ESTES	TITUSVILLE PA	07/26/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS PRE-PAID	GROUND COVER MAT - 4' X 8' PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL			13	120.00 172.65	1,560.00 172.65 1,732.65

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$1,732.65

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE

INVOICE NO.

8/11/200

00-282

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

GROUNDWATER SUPPLY COMPANY
227 LEO MINSTER ROAD
STERLING, MA 01564
978-422-3209

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
20978	NET 30		8/9/2000	HOFFMA...	FRANKLIN, PA	08/01/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS THIRD PA...	GROUND COVER MAT - 4' X 8' THIRD PARTY BILLING TO STERLING, MA ADDRESS MERCHANDISE SUBTOTAL			100	120.00 0.00	12,000.00 0.00
						12,000.00

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR!

Total \$12,000.00

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

8/11/2000 00-283

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

LLOYD WELL DRILLING
6007 HARBAR WAY
ORIENTAL, NC 28571

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30113	NET 30		8/3/2000	ESTES	TITUSVILLE PA	08/03/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-38CL	GROUND COVER MAT - 3' X 8'			3	97.50	292.50
PRE-PAID	PRE-PAID AND ADDED FREIGHT				60.47	60.47
6287-38CL	GROUND COVER MAT - 3' X 8'			1	97.50	97.50
PRE-PAID	(ORDERED 8/9/00 PER RAMONA)				60.03	60.03
	PRE-PAID AND ADDED FREIGHT					510.50
	MERCHANDISE SUBTOTAL					

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$510.50

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
8/11/200	00-287

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
704-871-0055

SHIP TO

RELIABLE PUMP & WELL DRILLING
1467 HODGE ROAD
KNIGHTDALE, NC 27545

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30117	NET 30		8/7/2000	ESTES	TITUSVILLE PA	08/07/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-38CL	GROUND COVER MAT - 3' X 8'			14	97.50	1,365.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT				145.85	145.85
	MERCHANDISE SUBTOTAL					1,510.85

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$1,510.85

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
8/25/200	00-300

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

SKIPPER'S WELL DRILLING
107 OAKLAND AVENUE
LELAND, NC 28451

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30149	NET 30		8/18/200	ESTES	TITUSVILLE PA	8/17/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-28CL	GROUND COVER MAT - 2 'X 8'			8	65.00	520.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT				81.42	81.42
	MERCHANDISE SUBTOTAL					601.42

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$601.42

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

9/29/2000 00-340

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21231	NET 30		9/26/2000	ESTES	TITUSVILLE PA	09/26/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-38CL	GROUND COVER MAT - 3' X 8'			6	97.50	585.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT				102.11	102.11
	MERCHANDISE SUBTOTAL					687.11

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$687.11

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
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10/23/20	00-367
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BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21346	NET 30		10/18/20	ESTES	TITUSVILLE PA	10/18/2...

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
6287-38CL PRE-PAID	GROUND COVER MAT - 3' X 8' PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL	10	97.50 115.07	975.00 115.07 1,090.07

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$1,090.07

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
11/14/20	00-394

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

DOUGLAS DRILL SERVICES
706 MEACHAM ROAD
STATESVILLE, NC 28677
704-871-0055

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30370	NET 30		11/9/200	ESTES	TITUSVILLE PA	11/08/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS PRE-PAID	GROUND COVER MAT - 4' X 8' PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL			40	120.00 459.44	4,800.00 459.44 5,259.44
	DELIVER ON MONDAY BEFORE 4 PM					

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$5,259.44

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE

INVOICE NO.

11/20/20

00-413

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21498	NET 30		11/14/20			
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
2424-4-PAD	24" X 24" X 4-PLY OUTRIGGER PAD MERCHANDISE SUBTOTAL			14	105.00	1,470.00 1,470.00

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total

\$1,470.00

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE

INVOICE NO.

11/27/20

00-425

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
VERBAL	NET 30		11/20/20	PICK UP	TITUSVILLE PA	11/20/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
R-6287-38	3' X 8' GROUNDCOVER MAT			4	157.50	630.00
6287-48FS	GROUND COVER MAT - 4' X 8'			1	120.00	120.00
	MERCHANDISE SUBTOTAL					750.00

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$750.00

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
11/27/20	00-426

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

DOUGLAS DRILL SERVICES
706 MEACHAM ROAD
STATESVILLE, NC 28677
704-871-0055

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30399	NET 30		11/21/20	ESTES	TITUSVILLE PA	11-20-00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS PRE-PAID	GROUND COVER MAT - 4' X 8' PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL			12	120.00 165.13	1,440.00 165.13 1,605.13

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$1,605.13

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE

INVOICE NO.

11/27/20 00-427

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

DOUGLAS DRILL SERVICES
706 MEACHAM ROAD
STATESVILLE, NC 28677
704-871-0055

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30400	NET 30		11/21/20	ESTES	TITUSVILLE PA	11/20/00
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
6287-48FS PRE-PAID	GROUND COVER MAT - 4' X 8' PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL			12	120.00 172.21	1,440.00 172.21 1,612.21

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$1,612.21

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

1/12/2000 00-478

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

GROUNDWATER SUPPLY COMPANY
227 LEOMINSTER ROAD-RT 12
STERLING, MA 01564
978-422-3209

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE		
21717	NET 30		12/29/20	HOFFMA...	TITUSVILLE PA	12/28/00		
ITEM	DESCRIPTION		QTY	RATE	AMOUNT			
6287-48FS	GROUND COVER MAT - 4' X 8'		150	120.00	18,000.00			
NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER NORMAL USE FOR 1 YEAR !								
					Total	\$18,000.00		

Apr, 09 01 04:34p

Janet Aaron

814-827-2903

P.9

ALTURNAMATS, INC.

PO BOX 344
 TITUSVILLE, PA 16354
 814-827-8884

INVOICE

DATE INVOICE NO.

2/5/2001 01-36

BILL TO

DOUGLAS DRILL SERVICES, INC.
 PO BOX 77
 PHILIPSBURG, PA 16866
 814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
 RT 322 W
 PHILIPSBURG, PA 16866
 814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21868	NET 30		2/5/2001	ESTES	TITUSVILLE PA	01/30/01
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
PAD23-3	CUSTOM 2' X 3' X 3-PLY OUTRIGGER PAD			2	125.00	250.00
PAD33-3	CUSTOM 3' X 3' X 3-PLY OUTRIGGER PAD			1	186.00	186.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL				60.42	60.42
						496.42

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
 NORMAL USE FOR 1 YEAR !

Total \$496.42

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

2/2/2001 01-40

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

TRENTHAM WELL DRILLING
1490 EAST GRAVES AVENUE
ORANGE CITY, FL 32763

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21882	NET 30		2/1/2001	ESTES	TITUSVILLE PA	01/31/01
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
AM28	2' X 8' GROUNDCOVER MAT			6	68.50	411.00
HANDING ...	SHIPPING & HANDLING CHARGE ON ORDERS LESS THAN \$500.00. (EXCLUDING FREIGHT)				25.00	25.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL				104.58	104.58
						540.58

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$540.58

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE INVOICE NO.

2/15/2001 01-81

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21945	NET 30		2/14/200	ESTES	TITUSVILLE PA	02/13/01
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
AM38	3' X 8' GROUNDCOVER MAT			12	102.40	1,228.80
PRE-PAID	PRE-PAID AND ADDED FREIGHT				136.86	136.86
	MERCHANDISE SUBTOTAL					1,365.66

**NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !**

Total \$1,365.66

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE	INVOICE NO.
2/23/200	01-100

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866
814-342-7260

SHIP TO

DOUGLAS DRILL SERVICES
RT 322 W
PHILIPSBURG, PA 16866
814-342-7260

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
21975	NET 30		2/23/200	ESTES	TITUSVILLE PA	02/20/01
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
AM38 HANDING ...	3' X 8' GROUNDCOVER MAT SHIPPING & HANDLING CHARGE ON ORDERS LESS THAN \$500.00. (EXCLUDING FREIGHT)			4	102.40 25.00	409.60 25.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT MERCHANDISE SUBTOTAL				69.65	69.65
						504.25

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR !

Total \$504.25

ALTURNAMATS, INC.

PO BOX 344
TITUSVILLE, PA 16354
814-827-8884

INVOICE

DATE

INVOICE NO.

3/16/200

01-147

BILL TO

DOUGLAS DRILL SERVICES, INC.
PO BOX 77
PHILIPSBURG, PA 16866

SHIP TO

DOUGLAS DRILL SERVICES
706 MEACHAM ROAD
STATESVILLE, NC 28677
704-871-0055

P.O. NO.	TERMS	REP	SHIP DATE	SHIP VIA	FOB	ORDER DATE
30670	NET 30		3/15/200	ESTES	TITUSVILLE PA	03/07/01
ITEM	DESCRIPTION			QTY	RATE	AMOUNT
AM48	4' X 8' GROUNDCOVER MAT			12	126.00	1,512.00
PRE-PAID	PRE-PAID AND ADDED FREIGHT				172.21	172.21
	MERCHANDISE SUBTOTAL					1,684.21

NOW GUARANTEED AGAINST CRACKING AND BREAKING UNDER
NORMAL USE FOR 1 YEAR!

Total \$1,684.21

Apr 09 01 04:43p Janet Aaron
04/19/2001 THU 15:34 FAX 18142267361

KOONAN LAW FIRM

814-827-2903

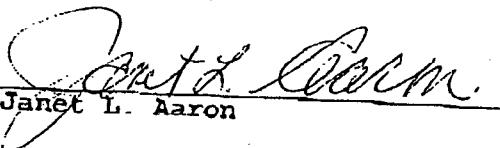
p.4

004

VERIFICATION

I, JANET L. AARON, President of Alturnamats, Inc., verify that the statements made herein are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 Pa. Con. Stat. Ann. Section 4904 relating to unsworn falsification to authorities.

DATE: April 19, 2001


Janet L. Aaron

jc:0992a
#18993

41 . . . 4

FILED
1:51
APR 30 2001
cc to Sheriff
✓ William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10958

ALTURNAMATS, INC.

01-617-CD

.VS.

DOUGLAS DRILL SERVICES, INC.

COMPLAINT

SHERIFF RETURNS

**NOW MAY 2, 2001 AT 9:59 AM DST SERVED THE WITHIN COMPLAINT ON
DOUGLAS DRILL SERVICE, INC., DEFENDANT AT EMPLOYMENT, TR 678,
GRAHAM STATION, PO BOX 77, PHILIPSBURG, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO PATRICK GARRITY, GENERAL MANAGER,
A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE
KNOWN TO HIM THE CONTENTS THEREOF.**

SERVED BY: DAVIS/MORGILLO

Return Costs

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

Sworn to Before Me This

4 Day Of May 2001


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

So Answers,


Chester A. Hawkins
Sheriff

FILED

MAY 04 2001

01/11:45 (a)
William A. Shaw
Prothonotary


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

ALTURNAMATS, INC.,

Plaintiff

*

* No. 617-2001-CD

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DOUGLAS DRILL SERVICES, INC.,

Defendant

*

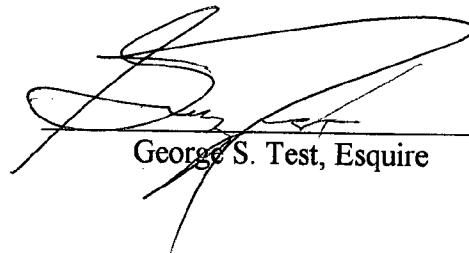
PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance on behalf of the Defendant in the above captioned matter.

Date:

5-9-01



George S. Test, Esquire

FILED

MAY 14 2001
M 18:46 am
William A. Shaw
Prothonotary

GEORGE S. TEST
ATTORNEY-AT-LAW
PHILIPSBURG, PA

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

ALTURNAMATS, INC.,

Plaintiff

*

No. 617-2001-CD

vs.

DOUGLAS DRILL SERVICES, INC.,

Defendant

*

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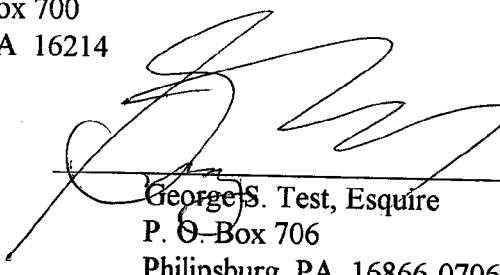
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*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Praeclipe for Entry of Appearance was served by way of first class mail, postage prepaid in Philipsburg, Pennsylvania, on May 10, 2001, addressed to the following:

Richard W. Kooman, II, Esquire
The Kooman Law Firm
Marianne Professional Center
P. O. Box 700
Clarion, PA 16214



George S. Test, Esquire
P. O. Box 706
Philipsburg, PA 16866-0706
(814) 342-4640

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

ALTURNAMATS, INC.,

Plaintiff

*

No. 617-2001-CD

*

vs.

*

ANSWER AND NEW MATTER

*

DOUGLAS DRILL SERVICES, INC.,

Defendant

*

Filed on behalf of Defendant,
Douglas Drill Services, Inc.

Counsel for this Party:

George S. Test, Esquire
P. O. Box 706
Philipsburg, PA 16866-0706
(814) 342-4640

PA I.D. #15915

FILED

MAY 18 2001

m111061nacc
William A. Shaw
Prothonotary

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

ALTURNAMATS, INC.,

Plaintiff

*

No. 617-2001-CD

*

*

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*

DOUGLAS DRILL SERVICES, INC.,

Defendant

*

ANSWER AND NEW MATTER

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. Said amount may have been the balance on March 16, 2001, but Defendant has made substantial payments on said account since March 16, 2001.
7. Denied. It is denied that Defendant refused to pay Plaintiff the sum owed by Defendant to Plaintiff and it is denied that Defendant owes Plaintiff the sum of \$50,264.09 for the reasons set forth in Defendant's New Matter.

NEW MATTER

8. Defendant has made payments to Plaintiff in the amount of \$20,000.00 in April 2001 and May 2001.

Respectfully submitted,

George S. Test, Esquire
Attorney for the Defendant

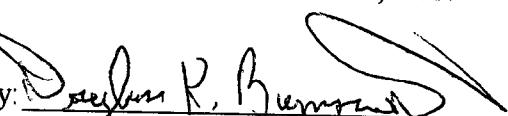
GEORGE S. TEST
ATTORNEY-AT-LAW
PHILIPSBURG, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF Centre

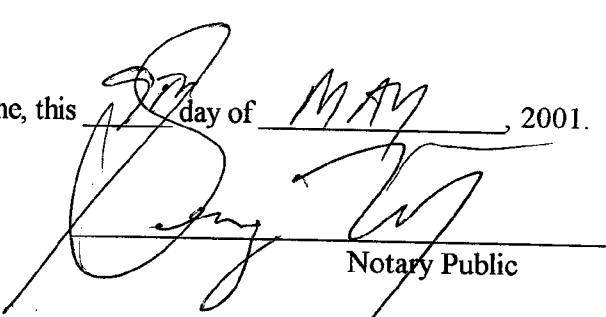
AFFIDAVIT

Before me, the undersigned officer, personally appeared **DOUGLAS K. BURNSWORTH**, President of Douglas Drill Services, Inc., the Defendant herein and acknowledged that he has read the foregoing Answer and New Matter and that the facts set forth are true and correct to the best of his knowledge, information and belief.

DOUGLAS DRILL SERVICES, INC.

By: 
Douglas K. Burnsworth, President

SWORN to and SUBSCRIBED before me, this 12 day of MAY, 2001.


Notary Public

Notarial Seal
George S. Test, Notary Public
Philipsburg Boro, Centre County
My Commission Expires Sept 19, 2004

GEORGE S. TEST
ATTORNEY-AT-LAW
PHILIPSBURG, PA

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

ALTURNAMATS, INC.,

Plaintiff

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No. 617-2001-CD

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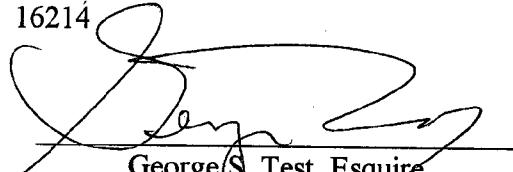
DOUGLAS DRILL SERVICES, INC.,

Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Answer and New Matter was served by way of first class mail, postage prepaid in Philipsburg, Pennsylvania, on May 17, 2001, addressed to the following:

Richard W. Kooman, II, Esquire
The Kooman Law Firm
Marianne Professional Center
P. O. Box 700
Clarion, PA 16214



George S. Test, Esquire
P. O. Box 706
Philipsburg, PA 16866-0706
(814) 342-4640

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ALTURNAMATS, INC. : CIVIL ACTION - LAW
Plaintiff : No. 617 - 2001
v. :
DOUGLAS DRILL SERVICES, INC., : TYPE OF CASE: CIVIL
Defendant : TYPE OF DOCUMENT:
: Praecipe for Discontinuance
: FILED ON BEHALF OF:
: Alturnamats, Inc.
: COUNSEL OF RECORD FOR THIS PARTY:
: Richard W. Kooman, II
: Supreme Court No. 15493
: The Kooman Law Firm
: Marianne Professional Center
: P.O. Box 700
: Clarion, PA 16214
: (814) 226-9100

jc:0990a
#18993

FILED

JUN 18 2001

William A. Shaw
Prothonotary

ALTURNAMATS, INC., : IN THE COURT OF COMMON PLEAS OF
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
v. : CIVIL ACTION - LAW
: :
DOUGLAS DRILL SERVICES, INC., :
Defendant : No. 617 - 2001

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

You are hereby directed to discontinue the above-captioned matter.

Respectfully submitted,

DATE: June 12, 2001

By Richard W. Kooman, II
RICHARD W. KOOMAN, II, ESQUIRE
The Kooman Law Firm
Attorney for Plaintiff
Marianne Professional Center
P.O. Box 700
Clarion, PA 16214
(814) 226-9100

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLARION) ss:
)

On this, the 12th day of June, 2001, before me, the undersigned officer, personally appeared, RICHARD W. KOOMAN, II, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Jennifer M. Cussins
Notary Public

My Commission Expires:

jc:1026a
#18993

Notarial Seal	
Jennifer M. Cussins, Notary Public	
Paint Twp., Clarion County	
My Commission Expires Jan. 22, 2004	
Member, Pennsylvania Association of Notaries	

FILED

JUN 18 2001 12:58

William A. Shaw
Prothonotary

1 - c/s
1 - A/H Kooman

W
G

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Alturnamats

Vs. No. 2001-00617-CD
Douglas Drill Services, Inc.

CERTIFICATE OF DISCONTINUATION

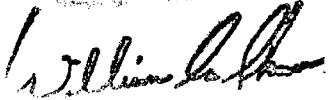
Commonwealth of PA
County of Clearfield

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 6/18/2001 marked:

Discontinue and Settle.

Record costs in the sum of \$80.00 have been paid in full by Richard W. Kooman..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 18th day of June A.D. 2001.



William A. Shaw, Prothonotary