

01-761-02  
CATHY LYNN STEFFEY -vs- JOHN J. GLASNER

LORENZO & GIANVITO, P.C.

ATTORNEYS AT LAW

410 WEST MAHONING STREET

P. O. BOX 495

PUNXSUTAWNEY, PA 15767

(814) 938-6390

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

JOHN J. GLASNER, an  
individual,

Defendant.

Type of Case - CIVIL

No. 01-781-CD

Type of Pleading - COMPLAINT

Filed on Behalf of - PLAINTIFF

Filed by -

NICHOLAS F. LORENZO, JR., ESQ.  
Pa. I.D. #05864

LORENZO & GIANVITO, P.C.  
410 West Mahoning St.  
P.O. Box 495  
Punxsutawney, PA 15767  
(814) 938-6390

**FILED**

MAY 22 2001

William A. Shaw  
Prothonotary

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

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

No. \_\_\_\_\_

JOHN J. GLASNER, an  
individual,

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 claim 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 OBTAIN LEGAL HELP.

Prothonotary  
Courthouse  
One N. 2<sup>nd</sup> St.  
Clearfield, PA 16830  
(814) 765-2641

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

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

No. \_\_\_\_\_

JOHN J. GLASNER, an  
individual,

Defendant.

COMPLAINT

AND NOW, comes the plaintiff, CATHY LYNN STEFFEY, by and through her counsel, NICHOLAS F. LORENZO, JR., ESQ., of LORENZO & GIANVITO, P.C., who files the following Complaint, of which the facts set forth hereinafter are a true and concise summary:

1. Plaintiff, CATHY LYNN STEFFEY, is an adult individual, who resides at R.D. #5, Box 484, Punxsutawney, Jefferson County, Pennsylvania, 15767.

2. Defendant, JOHN J. GLASNER, is an adult individual who resides at R.R. 3, Box 397, Greentown, Pike County, Pennsylvania, 18426.

3. At all times relevant to this Complaint, there existed within Bloom Township, Clearfield County, Pennsylvania, a roadway known as State Route 219, which runs generally in a north-south direction.

4. At approximately 5:30 p.m. on Saturday, July 31, 1999, plaintiff, CATHY LYNN STEFFEY, was operating her vehicle, a 1996

Chevrolet Lumina, southbound on the aforescribed S.R. 219; at the same time, defendant, JOHN J. GLASNER, was traveling north on the same roadway in his 1990 Mazda Miata. As he was traveling downhill in a right curve near the intersection with S.R. 3011, Irishtown Road, Chestnut Grove, Clearfield County, Pennsylvania, JOHN J. GLASNER allowed his vehicle to cross the centerline of the roadway directly into plaintiff's lane of travel. Despite Ms. Steffey's attempt to avoid a collision by moving onto the right berm, a collision did occur between both front driver sides, causing severe damage to both vehicles. Following the initial impact, the Steffey vehicle exited the road surface and came to rest against a utility pole, facing south. The Glasner vehicle re-crossed the northbound lane and came to rest on the east berm, facing east.

5. Defendant, JOHN J. GLASNER, was negligent and careless in the following respects:

a) Operating his vehicle without keeping a proper lookout for other vehicles lawfully traveling upon the roadway;

b) Failing to keep his vehicle under proper control by preventing it from crossing the centerline of the roadway and striking plaintiff's vehicle;

c) Operating his motor vehicle in a careless and inattentive manner;

d) Failing to operate his vehicle on the right side of the highway;

e) Crossing the centerline of the highway and striking another vehicle;

f) Failing to drive at a safe speed that would not permit him to lose control and cross the centerline of the highway;

g) Failing to operate his vehicle so as to be able to come to a complete stop within the assured clear distance ahead;

h) Violating the statutes of the Commonwealth, specifically, Section 3309, "driving wrong way on roadway laned for travel".

6. Due to the stated negligence and carelessness of the defendant, the plaintiff, CATHY LYNN STEFFEY, despite being seatbelted, was thrown violently forward within the passenger compartment of her vehicle. After being trapped in her vehicle for a period of time, she was removed by emergency personnel and transported via ambulance to the Dubois Regional Medical Center in Dubois, Pennsylvania, where she received treatment for her injuries.

7. As a result of the carelessness and negligence of the defendant, plaintiff sustained personal injuries, requiring her to receive medical or therapeutic treatment. Plaintiff's personal injuries suffered as a result of defendant's conduct are as follows:

- a) loss of consciousness or post-impact confusion;
- b) neck pain;
- c) radiating pain from right shoulder to middle finger;
- d) severe bruises on left side, including her thigh, hip, and foot;
- e) multiple cuts on face, hands, both arms and left leg;
- f) emotional upset.

8. As a result of the negligence and carelessness of the defendant, plaintiff has had her health, safety and vitality impaired, and she has sustained great pain, suffering, mental anguish, inconvenience and embarrassment.

9. As a result of the carelessness and negligence of the defendant, plaintiff has in the past, and will in the future, be required to expend sums of money for medical care, treatment and medications necessary for the care of her aforescribed injuries.

10. Plaintiff has in the past, and will in the future, be forced to endure pain, suffering, inconvenience, embarrassment and loss of the quality of her life, all as a direct result of the negligence and carelessness of the defendant.

11. At the time of the incident described herein, plaintiff was employed as a veterinarian's assistant, working approximately 35 hours a week, earning \$7.70/hour. At a result of the injuries sustained in the subject accident, Ms. Steffey was unable to work for a period of approximately two weeks, thereby sustaining a loss of income from this position, all as a direct result of the negligence and carelessness of the defendant.

12. As a result of the negligence and carelessness of the defendant, the future earning capacity of the plaintiff has been lessened, primarily due to the pain that she experiences in her neck and shoulders, and a limited range of motion when attempting to lift animals onto an examining table or into cages.

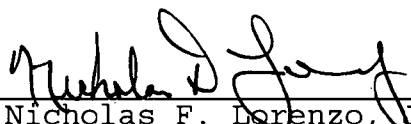


WHEREFORE, plaintiff demands judgment against defendant for a sum in excess of Twenty-Five Thousand and 00/100 (\$25,000.00) Dollars, or the maximum jurisdictional amount requiring arbitration.

JURY TRIAL DEMANDED.

LORENZO & GIANVITO, P.C.

Date: 5/18/2001

BY:   
Nicholas F. Lorenzo, Jr., Esq.  
Attorney for Plaintiff  
410 W. Mahoning St.  
P.O. Box 495  
Punxsutawney, PA 15767  
(814) 938-6390

COMMONWEALTH OF PENNSYLVANIA

SS:

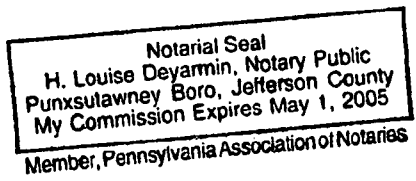
COUNTY OF JEFFERSON

CATHY LYNN STEFFEY, Plaintiff, being duly sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of her information, knowledge and belief.

Cathy Lynn Steffey  
Cathy Lynn Steffey

Sworn and subscribed to before me  
this 17th day of May, 2001.

H. Louise Deyarmin  
Notary Public



FILED  
MAY 22 2001  
MAY 11 3 49 PM  
Prothonotary  
William A. Shaw  
Shaw  
1 cc  
80.00  
MA Commission Expires May 1, 2002  
Prothonotary Seal, Jefferson County  
H. Conrad DeGroot, Notary Public  
Notary Seal



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11032

STEFFEY, CATHY LYNN

01-781-CD

VS.

GLASNER, JOHN J.

COMPLAINT

SHERIFF RETURNS

NOW MAY 23, 2001, HARRY GEIGER, SHERIFF OF PIKE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON JOHN J. GLASNER, DEFENDANT.

NOW JUNE 8, 2001 SERVED THE WITHIN COMPLAINT ON JOHN J. GLASNER, DEFENDANT BY DEPUTIZING THE SHERIFF OF PIKE COUNTY. THE RETURN OF SHERIFF GEIGER IS HERETO ATTACHED AND MADE A PART OF THIS RETURN STATING THAT HE SERVED KAREN GLASNER, WIFE.

Return Costs

Cost	Description
27.89	SHFF. HAWKINS PAID BY: ATTY.
170.10	SHFF. GEIGER PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

13 Day Of June 2001

*William A. Shaw*

So Answers,

*Chester A. Hawkins*  
*by Marilyn Hampe*  
Chester A. Hawkins  
Sheriff

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

FILED

2:04  
JUN 13 2001  
William A. Shaw  
Prothonotary

# SHERIFF'S OFFICE PIKE COUNTY, PENNSYLVANIA

500 BROAD STREET, MILFORD, PENNSYLVANIA 18337 • (717) 296-6459

4

## SHERIFF SERVICE PROCESS RECEIPT, and AFFIDAVIT OF RETURN

INSTRUCTIONS FOR SERVICE OF PROCESS on the reverse of the last (No. 5) copy of this form. Please type or print legibly. Do not detach any copies.

1. PLAINTIFF/S/ <b>CATHY LYNN STEFFEY</b>	2. COURT NUMBER <b>781-01 CLEARFIELD</b>
3. DEFENDANT/S/ <b>JOHN J. GLASNER</b>	4. TYPE OF WRIT OR COMPLAINT: <b>COMPLAINT</b>

<b>SERVE</b> 	<b>AT</b>	5. NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVICE OR DESCRIPTION OF PROPERTY TO BE LEVIED, ATTACHED OR SOLD <b>JOHN J. GLASNER</b> 6. ADDRESS (Street or RFD, Apartment No., City, Boro, Twp., State and ZIP Code) <b>RR#3 BOX 397, GREENTOWN, PA 18426</b>
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676-3938

7. INDICATE UNUSUAL SERVICE: ☐ PERSONAL ☐ PERSON IN CHARGE ☐ DEPUTIZE ☐ CERT. MAIL ☐ REGISTERED MAIL ☐ POSTED ☐ OTHER

Now, 20 , I, SHERIFF OF PIKE COUNTY, PA., do hereby deputize the Sheriff of \_\_\_\_\_ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff.

8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:

SEE MAP

**NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN** — Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. SIGNATURE of ATTORNEY or other ORIGINATOR				10. TELEPHONE NUMBER		11. FAX NUMBER	
12. Advance Costs				Total Costs		COST DUE OR REFUND	

### SPACE BELOW FOR USE OF SHERIFF ONLY — DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above	SIGNATURE of Authorized PCSD Deputy or Clerk and Title <b>A. WILLIS/CLERK</b>	14. Date Received <b>5-29-01</b>	15. Expiration/Hearing date <b>ASAP</b>
-----------------------------------------------------------------------	----------------------------------------------------------------------------------	-------------------------------------	--------------------------------------------

16. I hereby CERTIFY and RETURN that I ☒ have personally served, ☐ have legal evidence of service as shown in "Remarks", ☐ have executed as shown in "Remarks", the writ or complaint described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., at the address inserted below by handling a TRUE and ATTESTED COPY thereof.

17. ☐ I hereby certify and return a NOT FOUND because I am unable to locate the individual, company, corporation, etc., named above. (See remarks below)

18. Name and title of individual served (if not shown above) <b>KAREN GLASNER WIFE</b>	19. A person of suitable age and discretion then residing in the defendant's usual place of abode.
-------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------

20. Address of where served (complete only if different than shown above) (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code)  <b>BRINK ROAD yellow 2sty House with white picket fence across front of house on LT side of road "Left Notice"</b>												21. Date of Service <b>6-8-01</b>	22. Time <b>0900</b>
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23. ATTEMPTS	Date	Miles	Dep. Int.	Date	Miles	Dep. Int.	Date	Miles	Dep. Int.	Date	Miles	Dep. Int.	Date	Miles	Dep. Int.
	6/6/01	70	RT	6/6/01	70	RT	6-8	70	SR						
24. TIME OF ATTEMPTS	1100			0915			0900								

AFFIRMED and subscribed to before me this <u>June</u> 20 <u>01</u> day of <u>June</u> <u>Alison L. Siddons</u> <small>Prothonotary/Deputy/Notary Public</small>	SO ANSWER. <u>STERLING E. REISS JR</u> <small>By (Sheriff/Dep. Sheriff) (Please Print or Type)</small> <u>Sheriff E. Reiss Jr</u> <small>Signature of Sheriff</small>	Date <u>6-8-01</u> Date
MY COMMISSION EXPIRES <u>2-25-2002</u>		SHERIFF OF PIKE COUNTY <div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>NOTARIAL SEAL</b>  <b>ALISON L. SIDDONS, NOTARY PUBLIC</b>  <b>MILFORD, PIKE COUNTY</b>  <b>MY COMMISSION EXPIRES FEB. 25, 2002</b> </div>
I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED ISSUING AUTHORITY AND TITLE.		39. Date Received

PROTHONOTARY

**SHERIFF'S RETURN OF SERVICE**

- ( ) (1) The within \_\_\_\_\_  
upon \_\_\_\_\_, the within named  
defendant by mailing to \_\_\_\_\_  
by \_\_\_\_\_ mail, return receipt requested, postage  
prepaid, \_\_\_\_\_ on the \_\_\_\_\_  
a true and attested copy thereof at \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The return receipt signed by \_\_\_\_\_  
defendant on the \_\_\_\_\_ is hereto attached and  
made a part of this return.

- ( ) (2) Outside the Commonwealth, pursuant to Pa. R.C.P. 2079 (c) (3), by mailing a true  
and attested copy thereof at \_\_\_\_\_  
\_\_\_\_\_ in the following manner:

- ( ) (a) To the defendant by ( ) registered ( ) certified mail, return receipt requested,  
postage prepaid, addressee only on the \_\_\_\_\_,  
said receipt being returned NOT signed by defendant, but with a notation by the Postal  
Authorities that Defendant refused to accept the same. The returned receipt and envelope  
is attached hereto and made part of this return.

And thereafter:

- ( ) (b) To the defendant by ordinary mail addressed to defendant at same address, with the  
return address of the Sheriff appearing thereon, on the \_\_\_\_\_  
\_\_\_\_\_

I further certify that after thirty (30) days from the mailing date, I have not received  
said envelope back from the Postal Authorities. A certificate of mailing is hereto attached  
as a proof of mailing.

- ( ) (3) By publication in the Pike County Dispatch, a weekly publication of general circulation  
in the County of Pike, Commonwealth of Pennsylvania, and having general circulation in  
said County for \_\_\_\_\_ successive weeks of \_\_\_\_\_  
\_\_\_\_\_

The Affidavit from said Pike County Dispatch, are hereto  
attached and made part of this return.

- ( ) (4) By mailing to \_\_\_\_\_  
by \_\_\_\_\_ mail, return receipt requested, postage prepaid,  
\_\_\_\_\_ on the \_\_\_\_\_  
a true and attested copy thereof at \_\_\_\_\_  
\_\_\_\_\_

The \_\_\_\_\_ returned by the Postal  
Authorities marked \_\_\_\_\_  
is hereto attached.

- ( ) (5) Other \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTED  
RECEIVED  
JAN 20 1988  
CLERK OF COURT  
PIKE COUNTY, PA.

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

CATHY LYNN STEFFEY,  
an individual,

Plaintiff

vs.

JOHN J. GLASNER,  
an individual,

Defendant

No. 01-781-CD

Type of Case: Civil Action

Type of Pleading: Praecipe for  
Entry of Appearance

Filed on Behalf of: Defendant

Michael S. Marshall, Esquire  
310 East Cherry Street  
Clearfield, PA 16830  
(814) 765-1701

Supreme Court No. 64087

**FILED**

JUN 25 2001

0133011c cathy

William A. Shaw  
Prothonotary

*E. Marshall*  
*KEL*



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

CATHY LYNN STEFFEY,  
an individual,

Plaintiff

vs.

JOHN J. GLASNER,  
an individual,

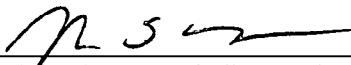
Defendant

No. 01-781-CD

**PRAECIPE FOR ENTRY OF APPEARANCE**

TO: WILLIAM A. SHAW, PROTHONOTARY

Please enter my appearance on behalf of the Defendant, JOHN J. GLASNER,  
in the above-captioned case.

  
Michael S. Marshall, Esquire

Dated: 6/25/01

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

CATHY LYNN STEFFEY,  
an individual,

Plaintiff

vs.

JOHN J. GLASNER,  
an individual,

Defendant


No. 01-781-CD

CERTIFICATE OF SERVICE

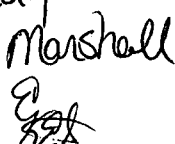
I hereby certify that a true and correct copy of the Praecipe for Entry of  
Appearance filed in the above case on behalf of Defendant was served upon the following  
individual on the 25<sup>th</sup> day of June, 2001, by first class mail at the United States Post  
Office, Clearfield, Pennsylvania, addressed as follows:

Nicholas F. Lorenzo, Jr., Esquire  
410 West Mahoning Street  
P.O. Box 495  
Punxsutawney, Pennsylvania 15767

Dated: 6/25/01

  
Michael S. Marshall, Esquire  
Attorney for Defendant

**FILED**

JUN 25 2001  
9:30 AM  
William A. Shaw  
Prothonotary  


LORENZO & GIANVITO, P.C.  
ATTORNEYS AT LAW  
410 WEST MAHONING STREET  
P. O. BOX 495  
PUNXSUTAWNEY, PA 15767  
(814) 938-6390

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

JOHN J. GLASNER, an  
individual,

Defendant.

Type of Case - CIVIL

No. 01-781-CD

Type of Pleading -  
NOTICE OF SERVICE

Filed on Behalf of - PLAINTIFF

Filed by -

NICHOLAS F. LORENZO, JR., ESQ.  
Pa. I.D. #05864

LORENZO & GIANVITO, P.C.  
410 West Mahoning St.  
P.O. Box 495  
Punxsutawney, PA 15767  
(814) 938-6390

**FILED**

OCT 24 2001

William A. Shaw  
Prothonotary

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

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

No. 01-781-CD

JOHN J. GLASNER, an  
individual,

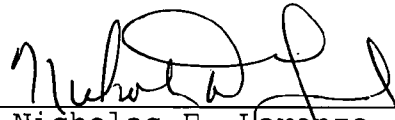
Defendant.

NOTICE OF SERVICE

TO THE PROTHONOTARY:

Please be advised that Plaintiff's First Set of Interrogatories and First Request for Production of Documents to Defendant were served upon said defendant, c/o his attorney: Michael S. Marshall, Esq., 310 E. Cherry St., Clearfield, Pa., 16830, this 22nd day of October, 2001, via regular first-class U.S. Mail, postage prepaid.

LORENZO & GIANVITO, P.C.

By:   
Nicholas F. Lorenzo, Jr., Esq.  
Attorney for Plaintiff

**AMMERMAN & MARSHALL**  
Attorneys at Law  
310 EAST CHERRY STREET  
CLEARFIELD, PA 16830

CERTIFIED COPY

CATHY LYNN STEFFEY,  
an individual,

**vs.**

Defendant

\*\*\*\*\*

Supreme Court No. 64087

**William A. Shaw**  
**Prothonotary**

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

CATHY LYNN STEFFEY,  
an individual,

Plaintiff

vs.

JOHN J. GLASNER,  
an individual,

Defendant

No. 01-781-CD

ANSWER

NOW COMES, the defendant, John J. Glasner, by and through his attorney,  
Michael S. Marshall, Esquire, who files an Answer to plaintiff's Complaint, and avers as  
follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. It is admitted that at the time and  
place described in the complaint, defendant's vehicle did cross the centerline of the  
highway and that plaintiff's vehicle and defendant's vehicle collided. It is denied that  
defendant "allowed" his vehicle to cross the centerline, to the extent that such allegation  
may imply that there was anything intentional or negligent about defendant's conduct. In  
addition, defendant is without knowledge or information sufficient to form a belief as to



the truth of the averment that plaintiff attempted to avoid the collision by moving onto the berm, and the same is therefore denied.

5. The averment that defendant was negligent and careless is a conclusion of law, to which no responsive pleading is required. To the extent that an answer may be deemed to be necessary, it is denied that defendant was negligent or careless with respect to any of the allegations set forth in paragraph 5.(a) through (h). To the contrary, defendant was operating his vehicle in a careful and attentive manner, within the posted speed limits and at a speed which was safe and appropriate for the conditions then existing. Immediately prior to the collision, defendant encountered a sudden and severe rain storm which made it nearly impossible to see the roadway ahead and which caused his vehicle to "hydroplane", making it impossible for defendant to steer the vehicle as he attempted to negotiate the curve in the road. The collision was caused by such unexpected and unavoidable weather conditions, and not by the manner in which defendant was operating his vehicle.

6. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 6, defendant is without knowledge or information sufficient to form a belief as to their truth.

7. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 7, defendant is without knowledge or information sufficient to form a belief as to their truth.

8. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 8, defendant is without knowledge or information sufficient to form a belief as to their truth.

9. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 9, defendant is without knowledge or information sufficient to form a belief as to their truth.

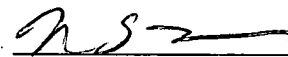
10. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 10, defendant is without knowledge or information sufficient to form a belief as to their truth.

11. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 11, defendant is without knowledge or information sufficient to form a belief as to their truth.

12. Denied. For the reasons set forth above, it is denied that defendant was negligent or careless. With regard to the remaining averments of paragraph 12, defendant is without knowledge or information sufficient to form a belief as to their truth.

WHEREFORE, defendant demands judgment in his favor and against plaintiff, together the costs of this action, attorney's fees and such other and further relief that this court deems just and appropriate.

Respectfully submitted,

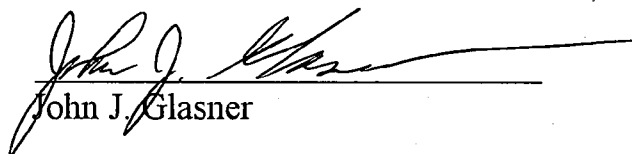


Michael S. Marshall, Esquire  
Attorney for defendant

## VERIFICATION

I, JOHN J. GLASNER, verify that the statements made in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.

Dated: 12-3-01

  
John J. Glasner

FILED

DEC 06 2001

5/3-35 P.M.

William A. Shaw  
Prothonotary

*One (1) Cert to Attorney*  
*[Signature]*

**AMMERMAN & MARSHALL**  
Attorneys at Law  
310 EAST CHERRY STREET  
CLEARFIELD, PA 16830

CERTIFIED COPY

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

CATHY LYNN STEFFEY,  
an individual,

Plaintiff

vs.

JOHN J. GLASNER,  
an individual,

Defendant

No. 01-781-CD

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Answer filed in the above case on behalf of Defendant was served upon the following individual on the 6th day of December, 2001, by first class mail at the United States Post Office, Clearfield, Pennsylvania, addressed as follows:


Nicholas F. Lorenzo, Jr., Esquire  
410 West Mahoning Street  
P.O. Box 495  
Punxsutawney, Pennsylvania 15767

Dated: 12/6/01

**FILED**

DEC 06 2001

William A. Shaw  
Prothonotary

  
Michael S. Marshall, Esquire  
Attorney for Defendant

Prothonotary  
William A. Shaw

DEC 06 2001

FILED

FILED

DEC 06 2001

01 31 36 P.M.

William A. Shaw  
Prothonotary

No CC *[Signature]*

LORENZO & GIANVITO, P.C.

ATTORNEYS AT LAW

410 WEST MAHONING STREET

P. O. BOX 495

PUNXSUTAWNEY, PA 15767

(814) 938-6390



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

JOHN J. GLASNER, an  
individual,

Defendant.

Type of Case - CIVIL

No. 01-781 C.D.

Type of Pleading -  
**NOTICE OF DEPOSITION**  
**FOR JOHN J. GLASNER, DEFENDANT**

Filed on Behalf of - **PLAINTIFF**

Filed by -

**NICHOLAS F. LORENZO, JR., ESQ.**  
Pa. I.D. #05864

LORENZO & GIANVITO, P.C.  
410 West Mahoning St.  
P.O. Box 495  
Punxsutawney, PA 15767  
(814) 938-6390

**FILED**

OCT 21 2002

William A. Shaw  
Prothonotary

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

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.  
JOHN J. GLASNER, an  
individual,

No. 01-781 CD

Defendant.

NOTICE OF DEPOSITION

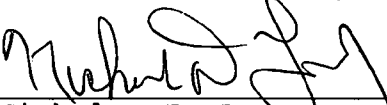
TO: JOHN J. GLASNER  
% Michael S. Marshall, Esq.  
310 East Cherry St.  
Clearfield, PA 16830

PLEASE TAKE NOTICE that pursuant to the Pennsylvania Rules of Civil Procedure, CATHY LYNN STEFFEY, plaintiff herein, gives notice that the deposition of JOHN J. GLASNER, defendant, will be taken on **Monday, November 11, 2002 at 10:00 AM.**, at the offices of the Lorenzo & Gianvito, P.C., 410 W. Mahoning Street, Punxsutawney, PA 15767.

The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure for use at trial.

Date: 10/18/02

LORENZO & GIANVITO, P.C.

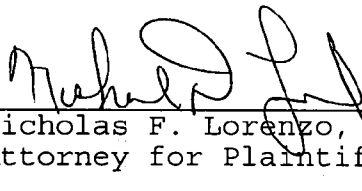
  
\_\_\_\_\_  
Nicholas F. Lorenzo, Jr.  
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 18<sup>th</sup> day of October, 2002,  
a true and correct copies of the foregoing Notice of Deposition  
was forwarded via first-class mail, postage prepaid, to the  
following:

Michael S. Marshall, Esq.  
310 E. Cherry St.  
Clearfield, PA 16830

Sargent Court Reporting  
210 Main St.  
Johnstown, PA 15901

  
\_\_\_\_\_  
Nicholas F. Lorenzo, Jr. Esq.  
Attorney for Plaintiff

FILED<sup>NO</sup>cc

11:32 AM  
OCT 21 2002

*[Signature]*

William A. Shaw  
Prothonotary

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
CIVIL TRIAL LISTING**

<b>CERTIFICATE OF READINESS</b> (To be executed by Trial Counsel Only)		<b>TO THE PROTHONOTARY</b>
		<b>DATE PRESENTED</b>
<b>CASE NUMBER</b> 01-781-CD Date Complaint filed:	<b>TYPE TRIAL REQUESTED</b> ( <input checked="" type="checkbox"/> ) Jury ( ) Non-jury ( ) Arbitration	<b>ESTIMATED TRIAL TIME</b> 3 DAYS

**PLAINTIFF(S)**

CATHY LYNN STEFFY

**DEFENDANT(S)**

JOHN J. GLASNER

**ADDITIONAL DEFENDANT(S)**

Check Block  
if a Minor  
is a Party  
to the Case

**JURY DEMAND FILED BY:**

PLAINTIFF

**DATE JURY DEMAND FILED:**

MAY 22, 2001

**AMOUNT AT ISSUE**

**CONSOLIDATION**

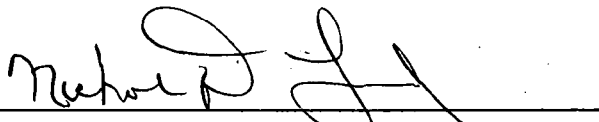
**DATE CONSOLIDATION ORDERED**

\$

( ) Yes (X) No

**PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.**

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

  
Signature of Trial Counsel

**FILED**

JAN 8 1 2003

William A. Shaw  
Prothonotary

**COUNSEL WHO WILL ACTUALLY TRY THE CASE**

**FOR THE PLAINTIFF**

Nicholas F. Lorenzo, Jr., Esq.

**TELEPHONE NUMBER**

814-938-6390

**FOR THE DEFENDANT**

Michael S. Marshall, Esq.

**TELEPHONE NUMBER**

814-765-1701

**FOR ADDITIONAL DEFENDANT**

**TELEPHONE NUMBER**

**FILED** *Copy to CIA*  
*m h 110 1011*  
JAN 31 2003  
*G* *1011*

William A. Shaw  
Prothonotary

Enclosures

1/31/03

Date: 04/10/2003

Clearfield County Court of Common Pleas

User: DGREGG

Time: 10:15 AM

ROA Report

Page 1 of 1

Case: 2001-00781-CD

Current Judge: Fredric J. Ammerman

Cathy Lynn Steffey vs. John J. Glasner

Civil Other

Date		Judge
05/22/2001	✓ Filing: Civil Complaint Paid by: Lorenzo, Nicholas F. Jr. (attorney for Steffey, Cathy Lynn) Receipt number: 1825644 Dated: 05/22/2001 Amount: \$80.00 (Check) One CC Sheriff	No Judge
06/13/2001	✓ Sheriff Returns, Complaint on John J. Glasner, filed. s/Chester A. Hawkins by Marilyn Hamm \$37.89 Shff Hawkins and \$170.10 Shff Geiger paid by Attorney	No Judge
06/25/2001	✓ Praeipce for Entry of Appearance on behalf of the Defendant. Filed by s/Michael S. Marshall, Esq. 1 cc atty Marshall	No Judge
	✓ Certificate of Service, Praeipce for Entry of Appearance upon Nicholas F. Lorenzo, Jr., Esq. s/Michael S. Marshall, Esq. 1 cc atty Marshall	No Judge
10/24/2001	✓ Notice of Service, Plaintiff's First Set of Interrogatories and First Request for Production of Documents to Defendant were served upon said Defendant c/o Michael S. Marshall, Esq. Filed by s/Nicholas F. Lorenzo, Jr., Esq. no cc	No Judge
12/06/2001	✓ Answer. Filed by s/Michael S. Marshall, Esq. Verification s/John J. Glasner One (1) cc to Atty	No Judge
	✓ Certificate of Service, Answer upon Nicholas F. Lorenzo, Jr., Esq. Filed by s/Michael S. Marshall, Esq. no cc	No Judge
10/21/2002	✓ Notice of Deposition of JOHN J. GLASNER. s/Nicholas F. Loranzo, Jr., Esq. Certificate of Service No cc	No Judge
01/31/2003	✓ Certificate of Readiness. filed by s/Nicholas F. Lorenzo, Jr., Esq. Copy to CA	No Judge

LORENZO, GIANVITO & LAVELLE, P.C.

ATTORNEYS AT LAW

410 WEST MAHONING STREET

P.O. BOX 495

PUNXSUTAWNEY, PA 15767

(814) 938-6390



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

JOHN J. GLASNER, an  
individual,

Defendant.

Type of Case -- CIVIL

No. 01-781-CD

Type of Pleading - PRAECIPE  
FOR DISCONTINUANCE

Filed on Behalf of - PLAINTIFF

Filed by -

NICHOLAS F. LORENZO, JR., ESQ.

Pa: I.D. #05864

LORENZO, GIANVITO & LAVELLE, P.C.

410 West Mahoning St.

P.O. Box 495

Punxsutawney, PA 15767

(814) 938-6390

**FILED**

APR 16 2003

m/11:55/w  
William A. Shaw  
Prothonotary

1 CENT TO ATT  
W/CENT

1 DISCONTINUANCE TO L/R

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

CATHY LYNN STEFFEY, an  
individual,

Plaintiff

Vs.

No. 01-781-CD

JOHN J. GLASNER, an  
individual,

Defendant.

PRAECIPE FOR DISCONTINUANCE

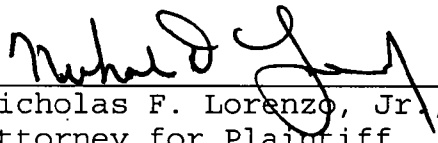
TO THE PROTHONOTARY:

Please mark the above-captioned matter as settled,  
discontinued and terminated.

LORENZO, GIANVITO & LAVELLE, P.C.

Date: 4/15/03

By:

  
Nicholas F. Lorenzo, Jr., Esq.  
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of April, 2003,  
a true and correct copy of the foregoing Praeceptum for  
Discontinuance was forwarded via first-class mail, postage  
prepaid, to the following:

Michael S. Marshall, Esq.  
310 E. Cherry St.  
Clearfield, PA 16830

  
\_\_\_\_\_  
Nicholas F. Lorenzo, Jr., Esq.

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

**CIVIL DIVISION**

**Cathy Lynn Steffey**

**Vs.**

**No. 2001-00781-CD**

**John J. Glasner**

**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 April 16, 2003, marked:

Settled, Discontinued and Terminated

Record costs in the sum of \$1287.99 have been paid in full by Atty. Lorenzo.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 16th day of April A.D. 2003.

---

William A. Shaw, Prothonotary