

01-1087-CD
RONALD P. BOYLES, JR. et ux -vs- JAMES COLLINS et al

ALVIN F. deLEVIE & ASSOCIATES

IDENTIFICATION NO. 23245

2047 LOCUST STREET

PHILADELPHIA, PA 19103

(215) 568-3900

PLAINTIFF

ATTORNEY FOR

RONALD P. BOYLES, JR., and
JILL BOYLES, H/W
RR 3 Box 240
Tyrone, PA 16686

VS.

JAMES COLLINS, Individually and
t/a THE COLLINS CAR WASH,
THE COLLINS RAINBOW CAR WASH
and THE RAINBOW CAR WASH
Corner of Dorey and East 20th Streets
Lawrence Township,
Clearfield County, PA

COURT OF COMMON PLEAS
CLEARFIELD DIVISION

TERM,

No. 01-1087-CO

FILED

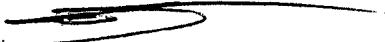
JUL 06 2001

P R A E C I P E

William A. Shaw
Prothonotary

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons for each Defendant in the above-captioned matter and forward to the Sheriff for service of same.

By: 

ALVIN F. deLEVIE, ESQUIRE
Attorney for Plaintiff

FILED

July 06 2001
By Mail 49 Cents, Deluxe pd
William A. Shaw
Prothonotary

4 Writs Sheriff

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

SUMMONS

**Ronald P. Boyles Jr and
Jill Boyles , h/w**

COPY

Vs.

NO.: 2001-01087-CD

**James Collins individually and t/a
The Collins Car Wash
The Collins Rainbow Car Wash
The Rainbow Car Wash**

TO: JAMES COLLINS
THE COLLINS CAR WASH
THE COLLINS RAINBOW CAR WASH
THE RAINBOW CAR WASH

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

Date: 07/06/2001

William A. Shaw
Prothonotary

Issuing Attorney:

Alvin F DeLevie
2047 Locust Street
Philadelphia, PA 19103

FILED

SEP 24 2001

William A. Shaw
Prothonotary

ALVIN F. deLEVIE & ASSOCIATES

IDENTIFICATION NO. 23245

2047 LOCUST STREET

PHILADELPHIA, PA 19103

(215) 568-3900

ATTORNEY FOR

PLAINTIFF

RONALD P. BOYLES, JR., and
JILL BOYLES, H/W
RR 3 Box 240
Tyrone, PA 16686
VS.

JAMES COLLINS, Individually and
t/a THE COLLINS CAR WASH,
THE COLLINS RAINBOW CAR WASH
and THE RAINBOW CAR WASH
Corner of Dorey and East 20th Streets
Lawrence Township,
Clearfield County, PA 16803

CLEARFIELD COUNTY
COURT OF COMMON PLEAS
DIVISION

TERM,

No.
01-1087-CD

CIVIL ACTION COMPLAINT

"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.

David S. Meholic
Court Administrator
One North 2nd Street
Clearfield, PA 16830
814-765-2641

"AVISO

"Le han demandado a usted en la corte. Si usted quiere defendarse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días, de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

"LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABajo PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASSOCIACION DE LICENCIADOS DE FILADELFIA
SERVICIO DE REFERENCIA E INFORMACION LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Teléfono: (215) 238-6333

1. Plaintiffs are individual citizens and residents of the Commonwealth of Pennsylvania residing therein at the address set forth in the caption above
2. Defendant JAMES COLLINS is an individual citizen and resident of the Commonwealth of Pennsylvania and t/a THE COLLINS CAR WASH, THE COLLINS RAINBOW CAR WASH and THE RAINBOW CAR WASH.
3. At all times material hereto, Defendants were the agents, servants and/or employees of the other acting within the course and scope of their agency and/or employment.
4. At all times material hereto, Defendants acted by and through their agents, servants and/or employees acting within the course and scope of their agency and/or employment.
5. All statutory requirements for the filing of this action have been fulfilled.
6. On or about January 1, 2000, Plaintiff was a business invitee of Defendants' car wash located in the vicinity of Dorey and East 20th Streets, Lawrence Township, Clearfield, PA.
7. At all times material hereto, Defendants were the owners and in possession and control of the car wash and all adjacent and contiguous pavements known as THE COLLINS CAR WASH, THE COLLINS RAINBOW CAR WASH and THE RAINBOW CAR WASH located in the vicinity of Dorey and East 20th Streets, Lawrence Township, Clearfield, PA.
8. On or about January 1, 2000, Plaintiff was caused to slip and fall at the Defendants' place of business, as aforesaid, sustaining multiple, permanent and personal injuries as set forth therein at length.
9. The accident aforesaid was caused solely as a result of the negligence of the Defendants and not whatsoever due to the action or inaction of the plaintiff

10. As a result of the accident aforementioned, plaintiff husband, sustained multiple injuries including but not limited to injury to his arms, legs, back and neck; shock and injury to his nerves and nervous system, some or all of which plaintiff has been advised are or may be permanent in nature.

11. As a result of the aforesaid, plaintiff husband, has undergone great physical pain and he will continue to endure the same to his great detriment and loss.

12. As a result of the Defendants' negligence as aforesaid, Plaintiffs have been obliged to expend and incur large sums of money for medical attention and various purposes in an attempt to effect a cure for the aforesaid injuries, and Plaintiff may be compelled to expend and/or incur additional sums for such medical attention.

13. As a result of the Defendants' negligence, the Plaintiff husband, was unable to attend to his daily duties and occupation, thereby suffering a loss of earnings and/or impairment of earning capacity, which plaintiff may continue to suffer for an indefinite time in the future.

14. Plaintiff husband, has or may suffer severe loss because of expenses which have been or may be reasonably incurred in obtaining ordinary and necessary services in lieu of those which Plaintiff would have performed, not for income but for the benefit of himself.

15. All averments contained in this Complaint are incorporated by reference in each of the following counts as though set forth therein at length.

COUNT ONE

PLAINTIFF RONALD P. BOYLES, JR. V. DEFENDANTS

16. As a result of the negligence of the Defendants as stated herein, Plaintiff Ronald Boyles was caused to slip and fall on a dangerous condition, to wit ice and snow which was allowed to remain on elevated hills and ridges and otherwise bumpy, rough and unsafe condition.

17. The negligence of the Defendants, their agents, servants and/or employees consisted of the following:

- a. Failing to clean the said pavement;
- b. Permitting ice and snow to remain on the said pavement;
- c. Permitting ice and snow to exist on a known public thoroughfare;
- d. Failing to warn Plaintiff of a dangerous condition on the pavement;
- e. Failing to provide Plaintiff with a safe and adequate passageway on the known public thoroughfare;
- f. Failing to properly and reasonably inspect the said pavement.

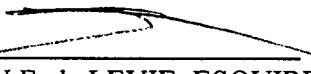
COUNT TWO

PLAINTIFF JILL BOYLES VS. DEFENDANTS

18. As a result of the negligence of the Defendants as stated herein and as a result of the injuries sustained by her husband, Plaintiff Jill Boyles has lost the society, companionship and consortium of her husband to her great detriment and loss.

WHEREFORE, Plaintiff demands a judgment against Defendants jointly and severally upon each of the foregoing counts in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

ALVIN F. de LEVIE & ASSOCIATES

BY: 

ALVIN F. de LEVIE, ESQUIRE
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA:
SS:
COUNTY OF PHILADELPHIA:

VERIFICATION

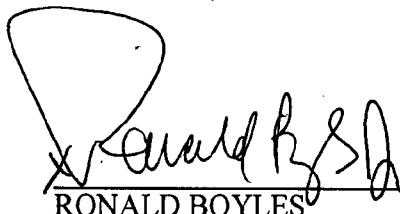
JILL BOYLES, hereby states that he is the Plaintiff in this action and verifies that the statements made in the foregoing Civil Action are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to penalties of 18 Pa. C.S. Sect. 4904 relating to unsworn falsification to authorities.

X Jill Boyles
JILL BOYLES

COMMONWEALTH OF PENNSYLVANIA:
SS:
COUNTY OF PHILADELPHIA:

VERIFICATION

RONALD BOYLES, hereby states that he is the Plaintiff in this action and verifies that the statements made in the foregoing Civil Action are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to penalties of 18 Pa. C.S. Sect. 4904 relating to unsworn falsification to authorities.



RONALD BOYLES

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11205

01-1087-CD

BOYLES, RONALD P. JR. & JILL

VS.

COLLNS, JAMES, ind & t/a

SUMMONS

SHERIFF RETURNS

**NOW JULY 12, 2001 AT 11:10 AM DST SERVED THE WITHIN SUMMONS ON
JAMES COLLINS Ind & t/a THE COLLINS CAR WASH, DEFENDANT AT EMPLOYMENT,
CAR WASH, HYDE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO
JAMES COLLINS A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND
MADE KNOWN TO HIM THE CONTENTS THEREOF.**

SERVED BY: DAVIS/MORGILLO

**NOW JULY 12, 2001 AT 11:10 AM DST SERVED THE WITHIN SUMMONS ON
THE COLLINS RAINBOW CAR WASH, DEFENDANT AT EMPLOYMENT, CAR WASH AT
HYDE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JAMES COLLINS,
DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE
KNOWN TO HIM THE CONTENTS THEREOF.**

SERVED BY: DAVIS/MORGILLO

**NOW JULY 12, 2001 AT 11:10 AM DST SERVED THE WITHIN SUMMONS ON
THE RAINBOW CAR WASH, DEFENDANT AT EMPLOYMENT, CAR WASH AT
HYDE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JAMES COLLINS,
OWNER, A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE
KNOWN TO HIM THE CONTENTS THEREOF.**

SERVED BY: DAVIS/MORGILLO

Return Costs

Cost Description

33.63 SHFF. HAWKINS PAID BY: ATTY.

30.00 SURCHARGE PAID BY: ATTY.

FILED
013:50 AM
JUL 13 2001
[Signature]

**William A. Shaw
Prothonotary**

COPY

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

SUMMONS

**Ronald P. Boyles Jr and
Jill Boyles , h/w**

Vs.

NO.: 2001-01087-CD

**James Collins individually and t/a
The Collins Car Wash
The Collins Rainbow Car Wash
The Rainbow Car Wash**

**TO: JAMES COLLINS
THE COLLINS CAR WASH
THE COLLINS RAINBOW CAR WASH
THE RAINBOW CAR WASH**

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

Date: 07/06/2001



William A. Shaw
Prothonotary

Issuing Attorney:

Alvin F DeLevie
2047 Locust Street
Philadelphia, PA 19103

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

Type of Action:
Personal Injury

Type of Pleading
Entry of Appearance

Filed on behalf of Defendants,
James Collins, Individually and t/a
The Collins Car Wash, The Collins
Rainbow Car Wash and The Rainbow
Car Wash

Counsel of Record for this Party

John J. Donnelly, Esquire
I.D. No.: 53898

Donnelly & Associates, P.C.
323 East Front Street
Media, PA 19063
(610) 892-7600

FILED

JAN 10 2002

m 10:46/ncc

William A. Shaw
Prothonotary

Q
KQJ

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

PRAEICE TO ENTER APPEARANCE

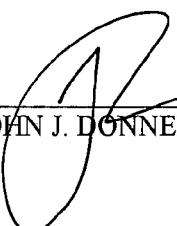
TO THE PROTHONOTARY:

Kindly enter my appearance as attorney for the defendants, JAMES COLLINS,
Individually and t/a THE COLLINS CAR WASH, THE COLLINS RAINBOW CAR WASH and
THE RAINBOW CAR WASH, in the above-captioned Civil Action.

DONNELLY & ASSOCIATES, P.C.

By:

JOHN J. DONNELLY, ESQUIRE



FILED

JAN 10 2002

M 10:46 1 NOCC
William A. Shaw
Prothonotary

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

Type of Action:
Personal Injury

Type of Pleading
Answer and New Matter

Filed on behalf of Defendants,
James Collins, Individually and t/a
The Collins Car Wash, The Collins
Rainbow Car Wash and The Rainbow
Car Wash

Counsel of Record for this Party

Richard J. Landry, Esquire
I.D. No.: 53898

Donnelly & Associates, P.C.
323 East Front Street
Media, PA 19063
(610) 892-7600

FILED

FEB 01 2002

William A. Shaw
Prothonotary

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

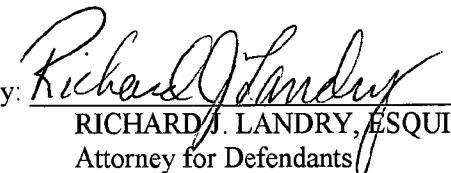
Defendants,

NOTICE TO PLEAD

To: Plaintiffs:

You are hereby notified to file a written response to the enclosed pleading within twenty (20) days from service hereof or a judgment may be entered against you.

DONNELLY & ASSOCIATES, P.C.

By: 
RICHARD J. LANDRY, ESQUIRE
Attorney for Defendants

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

ANSWER & NEW MATTER

1. Admitted.
2. Denied as stated. The Collins Rainbow Car Wash is located at 19th & Dorey Streets. Answering Defendant lacks sufficient knowledge or information to form a belief as to the remaining averments in this paragraph.
- 3-4. Denied. The averments contained in these paragraphs state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in these paragraphs and, therefore, denies same and demands strict proof thereof at trial. On the contrary, responding defendant specifically denies that at any time material hereto it acted through authorized agents and employees in the manner as averred by the plaintiff. Strict proof of this averment is demanded at trial. To the contrary, responding party at all times material hereto acted independently and in our own interest and not through or by an agent.

5. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial.

6. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial. To the contrary at all times pertinent hereto the plaintiff was a licensee or trespasser.

7. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial. By way of further response, the Collins Rainbow Car Wash is located at 19th and Dorey Streets.

8-15. Denied. The averments contained in these paragraphs state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the

averments contained in these paragraphs and, therefore, denies same and demands strict proof thereof at trial.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiffs, and that Plaintiffs' Complaint be dismissed with prejudice.

COUNT I

16. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial. It is specifically denied that Answering Defendant allowed "elevated hills and ridges and otherwise bumpy and rough and unsafe condition" to accumulate or exist on the property. To the contrary at all times pertinent hereto Answering Defendant acted in a safe, careful and non-negligent manner. Moreover, the Collins Rainbow Car Wash has heated floors and walkways.

17. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiffs, and that Plaintiffs' Complaint be dismissed with prejudice.

COUNT II

18. Denied. The averments contained in this paragraph state conclusions of law to which no answer is required in accordance with the applicable Pennsylvania Rules of Civil Procedure. By way of further answer, however, after reasonable investigation, answering defendant lacks sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiffs, and that Plaintiffs' Complaint be dismissed with prejudice.

NEW MATTER

19. If Plaintiff sustained injuries as alleged, then the same were solely as a result of the failure of the Plaintiff to exercise due care for his own safety. The negligence, recklessness and carelessness of the Plaintiff is more fully set forth as follows:

- (a) Failing to keep a proper lookout;
- (b) Failing to utilize and choose a safe alternate route;
- (c) Failing to properly maintain his shoes of footwear in a reasonable and safe manner under the circumstances;
- (d) Failing to adequately inspect the area where he intended to walk;
- (e) Disregarding open and obvious impediments, the existence of which have been alleged but are specifically denied by answering defendant, to his travel; and
- (f) Exiting his vehicle when and where it was not safe to do so.
- (g) Constantly disregarding open and obvious impediments, the existence of which have been alleged but are specifically denied by Answering Defendants, to his travel.

20. The Plaintiff assumed the risk of injury.

21. Plaintiff suffers from a pre-existing injury if any.

22. Plaintiffs' Complaint fails to state a cause of action upon which relief can be granted.

23. Plaintiffs' causes of action are barred by the applicable and non-waivable statute of limitations.

24. Plaintiffs' claims and/or causes of action are limited, governed, barred and/or restricted by the terms of the Pennsylvania Comparative Negligence Act, the relevant terms of which are incorporated by reference herein, since Plaintiff's negligence exceeds the negligence of Defendant, if any.

25. Plaintiffs' cause of action and/or claim set forth in the Complaint are limited, governed, barred and/or restricted as the Plaintiffs have failed to mitigate their damages.

26. In the event that it is established that Plaintiff sustained any injuries or damages as alleged, which are strictly denied, said injuries and/or damages were caused by the acts or omissions of other persons or parties over whom answering defendant had no control or duty to control and answering defendant asserts that there is no liability on its part.

27. Plaintiff's claims of negligence may be the result of actual omission of other individuals or entities which acts or omissions have constituted intervening or superseding causes of the damages or injuries allegedly sustained by the Plaintiff.

28. Plaintiffs' causes of action and/or claim are barred by the Doctrine of Contributory Negligence as the direct and approximate cause of the injuries suffered by the Plaintiff was the contributory negligence of the Plaintiff in failing to exercise the degree of care which a reasonable, prudent person would have exercised under the same or similar circumstances for his own safety and well being.

29. The injuries alleged to have been sustained by the Plaintiff were not proximately or directly caused by the answering defendant.

30. If the Plaintiffs request damages for delay pursuant to Pa.R.C.P. 238, answering defendants challenge the applicability and constitutionality of that rule and places it at issue.

31. If there is a judicial determination that Pa.R.C.P. 238, in the within action, is constitutional, then any liability for any interest imposed by said rule should be superseded during the period of time that Plaintiffs failed to convey a reasonable settlement figure, delays in responding to Interrogatories, delays in responding to Request for Production of Documents and Things, delays in producing witnesses for deposition or delays in other discovery requests by the answering Defendant and, as a result of such delay, Plaintiffs should be estopped from claiming any interest under such rule.

32. Plaintiff's injuries, if any, were not caused by Plaintiff's alleged fall described in the Complaint.

33. Plaintiff's claims are barred by the choice of paths and/or ways doctrines.

34. Plaintiffs' claims and this lawsuit are barred because of Plaintiff's failure to join necessary and indispensable parties.

35. Defendants incorporate all affirmative defenses included in Pa.R.C.P. 1030 upon advice of counsel that failure to raise said defenses constitutes a waiver of the defenses.

36. This Honorable Court lacks jurisdiction over the subject matter of this litigation.

37. Plaintiff did not fall on the property controlled by Defendants but rather on public property if Plaintiff fell at all.

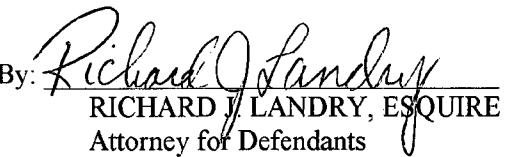
38. Plaintiffs' claims are barred by the doctrine of "Hills and Ridges."

39. Plaintiff has failed to mitigate his damages, if any.

40. Plaintiff's causes of action and/or claims are barred by the Doctrine of Contributory Negligence as the direct and approximate cause of the injuries suffered by the Plaintiffs was the contributory negligence of the Plaintiff in failing to exercise the degree of care which a reasonable, prudent person would have exercised under the same or similar circumstances for his own safety and well being.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiffs, and that Plaintiffs' Complaint be dismissed with prejudice.

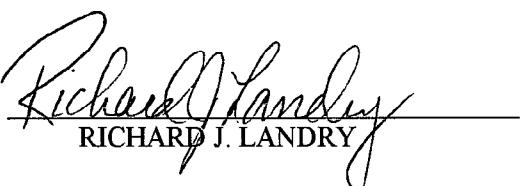
DONNELLY & ASSOCIATES, P.C.

By: 
RICHARD J. LANDRY, ESQUIRE
Attorney for Defendants

VERIFICATION

I, RICHARD J. LANDRY, ESQUIRE, attorney for Defendant in the within action, hereby state that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



Richard J. Landry
RICHARD J. LANDRY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

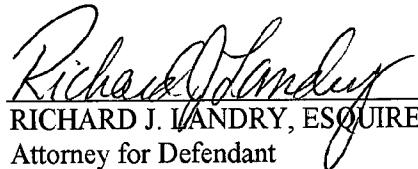
JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

CERTIFICATE OF SERVICE

RICHARD J. LANDRY, ESQUIRE, attorney for defendant hereby certifies that copy of
Additional Defendants Answer and New Matter was served upon all counsel of record by United
States first class mail.

DATE: 01-29-02

BY: 
RICHARD J. LANDRY, ESQUIRE
Attorney for Defendant

FILED

FEB 01 2002

William A. Shaw
Prothonotary

DONNELLY & ASSOCIATES, P.C.

ATTORNEYS AT LAW

323 East Front Street
Media, Pennsylvania 19063

Phone: (610) 892-7600
Fax: (610) 892-7699

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY

ALVIN F.de LEVIE, EQUIRE
940-Public Ledger Building
150 S. Independence Mall West
Philadelphia, PA 19106
I.D. 23245
215-568-3900
215-568-4010 FAX

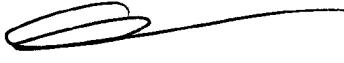
ATTORNEY FOR PLAINTIFF

RONALD P. BOYLES, JR., and :
JILL BOYLES, H/W :
VS. :
JAMES COLLINS, Individually and :
t/a THE COLLINS CAR WASH, :
THE COLLINS RAINBOW CAR WASH :
and THE RAINBOW CAR WASH :
: NO: 01 - 1087 CD

R E P L Y

TO THE PROTHONOTARY:

Allegations contained in the New Matter of Defendants are hereby denied as conclusions of law to which no further response is required pursuant to the Pennsylvania Rules of Civil Procedure.

By: 

ALVIN F. de LEVIE, ESQUIRE
Attorney for Plaintiff

FILED

FEB 15 2002

12:45 PM
William A. Shaw
Prothonotary

I cert to Atty [Signature]

CA

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,
vs.
NO. 01-1087-CD

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

Type of Action:
Personal Injury

Type of Pleading
Motion to Compel Discovery

Filed on behalf of Defendants,
James Collins, Individually and t/a
The Collins Car Wash, The Collins
Rainbow Car Wash and The Rainbow
Car Wash

Counsel of Record for this Party

Richard J. Landry, Esquire
I.D. No.: 53898

Donnelly & Associates, P.C.
323 East Front Street
Media, PA 19063
(610) 892-7600

FILED

FEB 28 2002

**William A. Shaw
Prothonotary**

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

FILED

MAR 01 2002

Defendants,

William A. Shaw
Prothonotary

ORDER

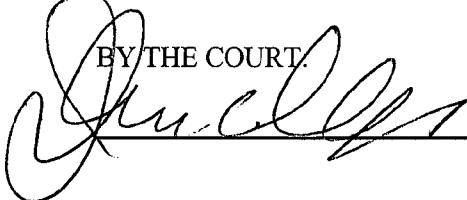
AND NOW, this 15 day of March, 2001, upon consideration of

Defendants' Motion to Compel Answers to Property Damage Interrogatories, Expert Witness
Interrogatories, Bad Faith Interrogatories and Request for Production of Documents and any answer
thereto, it is hereby ORDERED and DECREED that Plaintiffs shall file full and complete answers to
Defendant, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash
and The Rainbow Car Wash's:

1. Slip and Fall Interrogatories,
2. Ice and Snow Interrogatories,
3. Supplemental Bodily Injury Interrogatories, and
4. Request for Production of Documents

twenty (20)
within ~~ten (10)~~ days from the date hereof or appropriate sanctions will be imposed upon application to
this Honorable Court.

BY THE COURT



J.

FILED

1cc

Atty Landry

03:34 PM
MAR 01 2002

cc

William A. Shaw
Prothonotary

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

DEFENDANTS, MOTION TO COMPEL
PLAINTIFFS' ANSWERS TO DISCOVERY

Defendants, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash, hereby make this Motion to Compel Discovery and state their reasons as follows:

1. On or about January 22, 2002, the attorney for the Defendants forwarded to the Plaintiffs' counsel Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents.

2. The Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents seek information which is relevant and discoverable in this matter.

3. To date, the Plaintiffs have not served answers to these discovery requests.

WHEREFORE, Defendant James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash requests an Order for Sanctions under Pennsylvania Rule of Civil Procedure No. 4019 which directs the Plaintiffs to file full and complete

answers without objections to Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents within twenty (20) days of service of this Court's Order.

DONNELLY & ASSOCIATES, P.C.

By: *Richard J. Landry*
RICHARD J. LANDRY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS,
MOTION TO COMPEL ANSWERS TO DISCOVERY

Defendants, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash, by and through their attorneys, Donnelly & Associates, P.C., forwarded Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents to Plaintiffs' attorney on January 22, 2002. The Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents seek information which is relevant and discoverable in this matter. To date, the Plaintiffs have not served answers to these discovery requests.

The Plaintiffs, despite repeated requests by Defendants' counsel, has failed to either answer or object to Defendants' discovery requests. More than the thirty days have lapsed since Plaintiff was served with the Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents.

Pennsylvania Rule of Civil Procedure 4006(a)(2) provides in part:

The answering party shall serve a copy of the answers, and objections if any, within thirty (30) days after the service of the Interrogatories.

Pennsylvania Rule of Civil Procedure 4009(a)(1) provides in part:

The party upon whom the request is served shall within thirty (30) days after service of the request...serve an answer...to each number paragraph in the request

Plaintiffs' failure to respond to Defendants' discovery requests is in blatant disregard of the Pennsylvania Rules of Civil Procedure on discovery. Accordingly, Defendant requests that this Honorable Court enter its Order compelling Plaintiff to answer, fully and completely, Defendants' Interrogatories and Request for Production of Documents.

WHEREFORE, Defendants, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash, requests an Order for Sanctions under Pennsylvania Rule of Civil Procedure No. 4019 be entered requesting the Plaintiffs to file and serve answers to Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents within twenty (20) days of service of this Court's Order.

DONNELLY & ASSOCIATES, P.C.

By: 
RICHARD J. LANDRY

VERIFICATION

I, RICHARD J. LANDRY, ESQUIRE, attorney for Defendants in the within action, hereby state that the facts set forth in the foregoing Motion to Compel Answers to Discovery are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



Richard J. Landry

RICHARD J. LANDRY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

CERTIFICATE OF SERVICE

RICHARD J. LANDRY, ESQUIRE, attorney for Defendants, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash, hereby certifies that a true and correct copy of Defendants' Motion to Compel Answers to Discovery was served upon all counsel of record by United States First Class Mail.

DONNELLY & ASSOCIATES, P.C.

Dated: 2-26-02

By: *Richard J. Landry*
RICHARD J. LANDRY

FILED

FEB 28 2002

111-2511-CC-00001
William A. Shaw
Prothonotary
Court

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

Type of Action:
Personal Injury

Type of Pleading
Praecipe to Substitute Verification

Filed on behalf of Defendants,
James Collins, Individually and t/a
The Collins Car Wash, The Collins
Rainbow Car Wash and The Rainbow
Car Wash

Counsel of Record for this Party

Richard J. Landry, Esquire
I.D. No.: 28522
Donnelly & Associates, P.C.
323 East Front Street
Media, PA 19063
(610) 892-7600

FILED

MAY 13 2002

5/18/2002
William A. Shaw
Prothonotary

1 CCR to ATO



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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

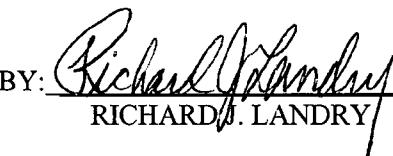
Defendants,

PRAECIPE TO SUBSTITUTE VERIFICATION

TO THE PROTHONOTARY:

Kindly substitute the attached verifications of Shari Collins and James A. Collins, for that of counsel, to the Answer and New Matter which was filed in the above matter on February 1, 2002.

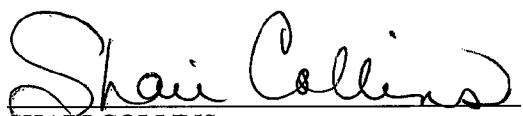
DONNELLY & ASSOCIATES, P.C.

BY: 
RICHARD J. LANDRY

VERIFICATION

I, SHARI COLLINS, Owner with my Husband, James A. Collins of The Collins Rainbow Car Wash, Defendant in the within action, hereby state that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief.

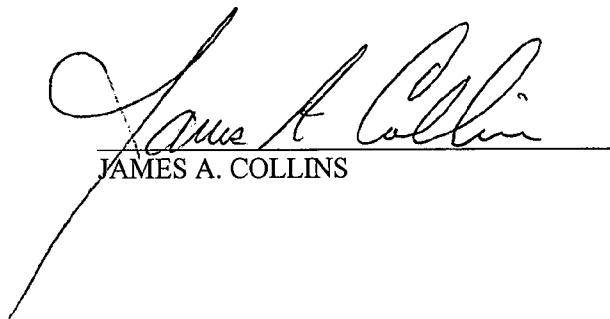
This Verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.


Shari Collins
SHARI COLLINS

VERIFICATION

I, JAMES A. COLLINS, Owner with my wife, Shari Collins of The Collins Rainbow Car Wash, Defendant in the within action, hereby state that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



A handwritten signature in black ink, appearing to read "James A. Collins". The signature is fluid and cursive, with "James" on the top line and "A. Collins" on the bottom line. A horizontal line is drawn under the signature, and the name "JAMES A. COLLINS" is printed in a smaller, sans-serif font directly beneath the line.

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

CERTIFICATE OF SERVICE

RICHARD J. LANDRY, ESQUIRE, attorney for Defendants, hereby certifies that a true and correct copy of Defendants' Praeclipe for Substitution of Verification was served upon all counsel of record by United States first class mail.

DATE:

BY:


RICHARD J. LANDRY
Attorney for Defendants

FILED

MAY 13 2002

**William A. Shaw
Prothonotary**

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,
vs.
NO. 01-1087-CD

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

Type of Action:
Personal Injury

Type of Pleading
Motion for Sanctions

Filed on behalf of Defendants,
James Collins, Individually and t/a
The Collins Car Wash, The Collins
Rainbow Car Wash and The Rainbow
Car Wash

Counsel of Record for this Party

Richard J. Landry, Esquire
I.D. No.: 28522
Donnelly & Associates, P.C.
323 East Front Street
Media, PA 19063
(610) 892-7600

FILED

JUL 24 2002

m/1134/catty landry
William A. Shaw
PROTHONOTARY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

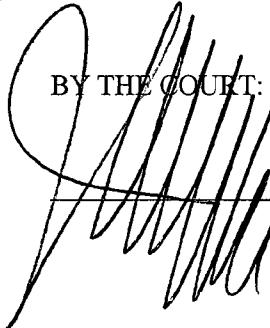
JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

ORDER

AND NOW, this 5th day of August, 2002, upon consideration of the Motion for Sanctions of Defendants, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash, and any response thereto, it is hereby ORDERED that Plaintiffs' Complaint is dismissed with prejudice for Plaintiffs' failure to comply with Court Order directing Plaintiffs to serve full and complete answers to Defendants' Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories, and Request for Production of Documents

BY THE COURT:



J

FILED

AUG 05 2002

o 1,2:30/1ws
William A. Shaw
Prothonotary

I CERT TO ATTY



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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

DEFENDANTS' MOTION FOR SANCTIONS

Defendants, James Collins, Individually and t/a The Collins Car Wash, the Collins Rainbow Car Wash and The Rainbow Car Wash, by their undersigned attorneys, hereby request that the Court enter an order under Pa.R.C.P. No. 4019 imposing sanctions upon Plaintiffs, Ronald P. Boyles, Jr. and Jill Boyles, for their failure to obey an Order to provide discovery, and in support thereof avers as follows:

1. On March 1, 2002, the Court entered an Order granting Defendants' Motion to Compel Discovery. The Order, in pertinent part, states that the "Plaintiffs shall file full and complete answers to Defendant, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash's Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories, and Request for Production of Documents no later than twenty (20) days from the date of this Order or appropriate sanctions will be imposed upon application to this Honorable Court." A copy of the Order is attached hereto and incorporated herein as Exhibit "A".

2. The Plaintiffs have failed to respond fully and completely to Defendants' discovery requests, including Defendants' Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents. Plaintiffs have not answered any of these discovery requests to date.

3. Pa.R.C.P. No. 4019(a)(1)(viii) provides that the Court may make an appropriate order if a party fails to obey an order of the Court respecting discovery.

4. By virtue of Plaintiffs' failure to comply, Defendant has been unable to secure important evidence and documents essential to the proof of its case and has been prejudiced as a result.

5. Pa.R.C.P. No. 4019(c)(3) provides that the Court may enter judgment by default as an appropriate sanction against the disobedient party for failure to comply with discovery rules and order of the Court.

WHEREFORE, Defendants respectfully request that this Court enter judgment by default in favor of Defendants and against Plaintiffs.

DONNELLY & ASSOCIATES, P.C.

By: Richard J. Landry
RICHARD J. LANDRY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

**MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTION FOR SANCTIONS**

On March 1, 2002, the Court entered an Order granting Defendants' Motion to Compel. The Order, in pertinent part, states that the "Plaintiffs shall file full and complete answers to Defendant, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash and The Rainbow Car Wash's Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories, and Request for Production of Documents no later than twenty (20) days from the date of this Order or appropriate sanctions will be imposed upon application to this Honorable Court." A copy of the Order is attached hereto and incorporated herein as Exhibit "A". The Plaintiffs have failed to respond fully and completely to Defendants' discovery requests, including Defendants' Slip and Fall Interrogatories, Ice and Snow Interrogatories, Supplemental Bodily Injury Interrogatories and Request for Production of Documents.

Pa.R.C.P. No. 4019(a)(1)(viii) provides that the Court may make an appropriate order if a party fails to obey an order of the Court respecting discovery. By virtue of Plaintiffs' failure to comply, Defendants have been unable to secure important evidence and documents essential to the proof of its case and has been prejudiced as a result.

Pa.R.C.P. No. 4019(c)(3) provides that the Court may enter judgment by default as an appropriate sanction against the disobedient party for failure to comply with discovery rules and order of the Court.

WHEREFORE, Defendants respectfully request that this Court enter judgment by default in favor of Defendants and against Plaintiffs.

DONNELLY & ASSOCIATES, P.C.

By: *Richard J. Landry*
RICHARD J. LANDRY

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

CERTIFICATE OF SERVICE

RICHARD J. LANDRY, ESQUIRE, attorney for Defendants hereby certifies that a true and correct copy of Defendants' Motion for Sanctions was served upon all counsel of record by United States First Class Mail.

DONNELLY & ASSOCIATES, P.C.

Dated: 7-22-02

By: *Richard J. Landry*
RICHARD J. LANDRY

VERIFICATION

I, RICHARD J. LANDRY, ESQUIRE, attorney for Defendants in the within action, hereby state that the facts set forth in the foregoing Motion for Sanctions are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



RICHARD J. LANDRY

EXHIBIT A



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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

Defendants,

O R D E R

AND NOW, this 1st day of March, 2001, upon consideration of

Defendants' Motion to Compel Answers to Property Damage Interrogatories, Expert Witness
Interrogatories, Bad Faith Interrogatories and Request for Production of Documents and any answer
thereto, it is hereby ORDERED and DECREED that Plaintiffs shall file full and complete answers to
Defendant, James Collins, Individually and t/a The Collins Car Wash, The Collins Rainbow Car Wash
and The Rainbow Car Wash's:

1. Slip and Fall Interrogatories,
2. Ice and Snow Interrogatories,
3. Supplemental Bodily Injury Interrogatories, and
4. Request for Production of Documents

twenty (20) JKR/BH
within ~~ten (10)~~ days from the date hereof or appropriate sanctions will be imposed upon application to
this Honorable Court.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

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

MAR 01 2002

Attest: William J. Reilly
Prothonotary

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY

ALVIN F.de LEVIE, EQUIRE
940-Public Ledger Building
150 S. Independence Mall West
Philadelphia, PA 19106
I.D. 23245
215-351-1100
215-351-0257 FAX

ATTORNEY FOR PLAINTIFF

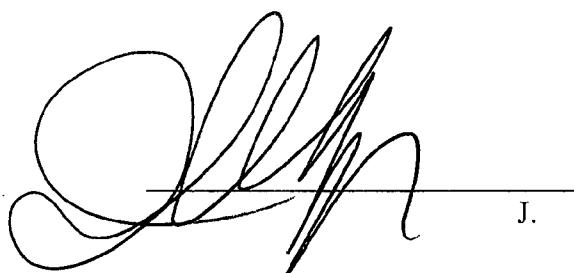
RONALD P. BOYLES, JR., and :
JILL BOYLES, H/W :
VS. :
JAMES COLLINS, Individually and :
t/a THE COLLINS CAR WASH, : NO: 01 - 1087 CD
THE COLLINS RAINBOW CAR WASH :
and THE RAINBOW CAR WASH :

ORDER

AND NOW, this 22nd day of August, 2002 upon consideration of
the Plaintiff's Motion for Reconsideration, it is hereby ORDERED and DECREED that this
Honorable Court's Order of August 5, 2002, is hereby vacated.

FILED

AUG 22 2002
01147116
William A. Shaw
Prothonotary



J.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY

ALVIN F.de LEVIE, EQUIRE
940-Public Ledger Building
150 S. Independence Mall West
Philadelphia, PA 19106
I.D. 23245
215-351-1100
215-351-0257 FAX

ATTORNEY FOR PLAINTIFF

RONALD P. BOYLES, JR., and	:
JILL BOYLES, H/W	:
VS.	:
JAMES COLLINS, Individually and	:
t/a THE COLLINS CAR WASH,	:
THE COLLINS RAINBOW CAR WASH	:
and THE RAINBOW CAR WASH	:

NO: 01 - 1087 CD

MOTION FOR RECONSIDERATION

Plaintiff, through his undersigned counsel hereby moves this Honorable Court to vacate the Order of August 5, 2002, and in support thereof avers the following:

1. On Wednesday, August 21, 2002, Plaintiff sent to defense counsel, via overnight delivery, Responses to all outstanding discovery requests which were the subject of prior Court Orders.
2. The instant action arises out of an automobile accident which occurred on January 1, 2000.
3. Plaintiff's counsel, Alvin F. de Levie, and defense counsel Richard Landry, Esquire, have worked amiably and collegially in the litigation of this matter.

4. In December, 2001, Plaintiff's counsel moved his law office and advised defense counsel of the move and of his new office address.

5. Seemingly, defense counsel filed a Motion for Sanctions seeking dismissal of Plaintiff's claim; Defense counsel inadvertently mailed the Motion to Plaintiff's counsel's old address which letter was not forwarded to Plaintiff's counsel's new office.

6. Had Plaintiff received a copy of the Motion, a Response would have been filed and compliance with a prior Order would have been fulfilled and discovery provided to Defendants.

7. Plaintiff's counsel first learned of the entry of the August 5, 2002, Order when it was faxed to his new office, although again the old office address was used for mailing purposes.

8. A surprised Plaintiff's counsel immediately called defense counsel to inquire as to why the Order had been entered; during conversations between counsel, it was learned that a Motion for Sanctions was, indeed, filed but mailed to Plaintiff's counsel's old address. The letter and Motion were not forwarded to Plaintiff's Counsel.

9. Plaintiff's counsel requested and defense counsel graciously and professionally agreed to sign a Stipulation agreeing that This Honorable Court's Order of August 5, 2002 be vacated. Attached hereto, made a part hereof and marked as Exhibit "A" is the original Stipulation signed by Counsel agreeing that the August 5, 2002, Order may be vacated.

10. Certainly, had Plaintiff received Defendants' Motion for Sanctions, Plaintiff would have responded in a timely fashion and would have complied with The Court's prior Order.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order vacating its August 5, 2002, Order.

Respectfully submitted,

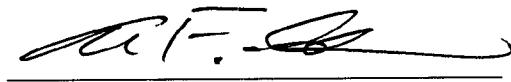


ALVIN F. de LEVIE, ESQUIRE
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA:
SS:
COUNTY OF PHILADELPHIA:

VERIFICATION

ALVIN F. de LEVIE, hereby states that he is the Attorney in this action and verifies that the statements made in the foregoing MOTION FOR RECONSIDERATION are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to penalties of 18 Pa. C.S. Sect. 4904 relating to unsworn falsification to authorities.



ALVIN F. de LEVIE, ESQUIRE

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY

ALVIN F.de LEVIE, EQUIRE
940-Public Ledger Building
150 S. Independence Mall West
Philadelphia, PA 19106
I.D. 23245
215-351-1100
215-351-5287 FAX

ATTORNEY FOR PLAINTIFF

RONALD P. BOYLES, JR., and :
JILL BOYLES, H/W :
VS. :
JAMES COLLINS, Individually and :
t/a THE COLLINS CAR WASH, : NO: 01 - 1087 CD
THE COLLINS RAINBOW CAR WASH :
and THE RAINBOW CAR WASH :

STIPULATION

AND NOW, this 19th day of Aug, 2002, it is hereby agreed and stipulated to by and between Alvin F. de Levie, Esquire, counsel for Plaintiff and Richard J. Landry, Esquire, counsel for Defendants, that This Honorable Court's Order of August 5, 2002, dismissing with prejudice Plaintiff's Complaint may be withdrawn and vacated.

By: Richard J. Landry
RICHARD J. LANDRY, ESQUIRE
Attorney for Defendants

By: ALVIN F. de LEVIE
ALVIN F. de LEVIE, ESQUIRE
Attorney for Plaintiff

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

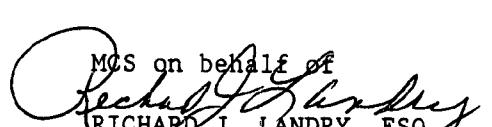
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 10/16/2002


MCS on behalf of
RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

FILED
m1117.61
OCT 18 2002
cc

William A. Shaw
Prothonotary

DE11-367144 07213-L01

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow
Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: PENN STATE CTR. SPORTS MED.
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

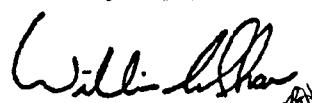
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002
DATE: Wednesday, September 18, 2002
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

PENN STATE CTR. SPORTS MED.
1850 E. PARK AVE. STE 112

UNIVERSITY PARK, PA 16803

RE: 7213
RONALD P. BOYLES

INCLUDING MEDICAL RECORDS FROM DR. JONATHON MCGUIRE.

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.
Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: GEISINGER MEDICAL CENTER
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

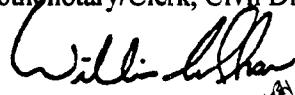
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**GEISINGER MEDICAL CENTER
100 N. ACADEMY AVENUE**

DANVILLE, PA 17822

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, relating to any examination, consultation care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: MARY F. CALLAHAN, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

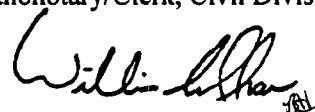
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**MARY F. CALLAHAN, M.D.
2520 GREEN TECH DRIVE**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: STEPHEN TINGLEY, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

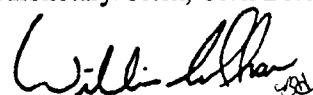
TELEPHONE: (215) 246-0900

SUPREME COURT ID # THE DEFENDANT
ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**STEPHEN TINGLEY, M.D.
2520 GREENTECH DRIVE
SUITE D**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967**

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

*

*

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

TO: CUSTODIAN OF RECORDS FOR: CENTRE COMMUNITY HOSPITAL
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

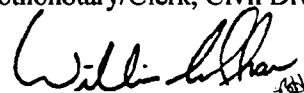
ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

SUPREME COURT ID # THE DEFENDANT
ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CENTRE COMMUNITY HOSPITAL
1800 E. PARK AVE**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, relating to any examination, consultation care or treatment.

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686**

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: WILLIAMSPORT ORTHOPEDIC & PROSTHETIC CO., INC
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

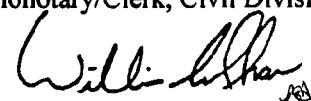
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**WILLIAMSORT ORTHOPEDIC AND
PROSTHETIC COMPANY INC.
224 E. FOURTH STREET**

WILLIAMSORT, PA 17701

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: 611 OPEN MRI
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

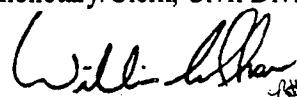
TELEPHONE: (215) 246-0900

SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

611 OPEN MRI
611 UNIVERSITY DRIVE
STATE COLLEGE, PA 16801

RE: 7213
RONALD P. BOYLES

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CENTRAL PENN REHAB ASSOC.
1520 MARTIN STREET**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

INCLUDING MEDICAL RECORDS FROM DR. JOHN C. EVANS, D.O.

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967**

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
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- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: ANNE ARUNDEL MEDICAL CENTER
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

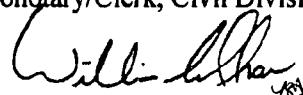
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**ANNE ARUNDEL MEDICAL CENTER
FRANKLIN AND CATHEDRAL ST**

ANNAPOLIS, MD 21401

**RE: 7213
RONALD P. BOYLES**

INCLUDING MEDICAL RECORDS FROM DR. TIMOTHY ECKEL

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
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- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: SURGICAL CENTER
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**SURGICAL CENTER
1850 E. PARK AVENUE
SUITE 103**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

INCLUDING MEDICAL RECORDS FROM DR. TODD COUSINS, M.D.

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967**

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: GEORGE P. MITCHELL, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

Deputy

10/16/2002
DATE: Wednesday, September 18, 2002

Seal of the Court



William A. Shaw

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**GEORGE P. MITCHELL, M.D.
444 E. COLLEGE AVENUE
SUITE 310**

STATE COLLEGE, PA 16801

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686**

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME

RECORDS REQUESTED

PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: CENTRE DIAGNOSTIC IMAGING
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

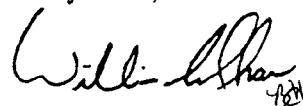
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002
DATE: Wednesday, September 18, 2002
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CENTRE DIAGNOSTIC IMAGING
2011 CATO AVENUE
SUITE 101**

STATE COLLEGE, PA 16801

**RE: 7213
RONALD P. BOYLES**

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/16/2002

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/26/2002

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
PENN STATE CTR. SPORTS MED.	MEDICAL RECORDS
GEISINGER MEDICAL CENTER	MEDICAL RECORDS
MARY F. CALLAHAN, M.D.	MEDICAL RECORDS
STEPHEN TINGLEY, M.D.	MEDICAL RECORDS
CENTRE COMMUNITY HOSPITAL	MEDICAL RECORDS
WILLIAMSPORT ORTHOPEDIC AND	MEDICAL RECORDS
611 OPEN MRI	MEDICAL RECORDS
CENTRAL PENN REHAB ASSOC.	MEDICAL RECORDS
ANNE ARUNDEL MEDICAL CENTER	MEDICAL RECORDS
SURGICAL CENTER	MEDICAL RECORDS
GEORGE P. MITCHELL, M.D.	MEDICAL RECORDS
CENTRE DIAGNOSTIC IMAGING	MEDICAL RECORDS
STATE COLLEGE	MEDICAL RECORDS

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and Jill Boyles

*

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, Individually and t/a

*

The Collins Car Wash, The Collins Rainbow

Car Wash, and The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: STATE COLLEGE
(Name of Person or Entity)

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

SEE ATTACHED

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 323 E. FRONT STREET
MEDIA PA 19063

TELEPHONE: (215) 246-0900

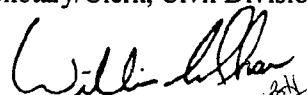
SUPREME COURT ID #

ATTORNEY FOR: THE DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

10/16/2002

DATE: Wednesday, September 18, 2002

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

STATE COLLEGE
ANESTHESIA ASSOC., P.C.
P.O. BOX 1230

STATE COLLEGE, PA 16801

RE: 7213
RONALD P. BOYLES

Any and all records, correspondence, files and memorandums, handwritten notes, billing and payment records, relating to any examination, consultation, care or treatment.

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE

FILED

PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

MAY 15 2003

William A. Shaw
Prothonotary

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 04/29/2003

MCS on behalf of
Richard J. Landry, Esq.
RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

611 OPEN MRI

MRI FILM ONLY

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 04/29/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ.

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**611 OPEN MRI
611 UNIVERSITY DRIVE
STATE COLLEGE, PA 16801**

**RE: 7213
RONALD P. BOYLES**

Any and all MRI films and reports, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis, consultation, care and/or treatment pertaining to:

**Dates Requested: up to and including the present.
Subject : RONALD P. BOYLES**

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

FILED ^{NO}
m1117-01
AUG 04 2003 *E*
ERB

William A. Shaw
Prothonotary/Clerk of Courts

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 07/23/2003

Richard J. Landry Esq.
MCS on behalf of
RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

07/29/2003 08:54
Jul 30 03 09:07a

215 568 4010
deLevie Alvin

215-568-4010

P. 1



1601 Market Street, Suite 800, Philadelphia Pennsylvania 19103
(215) 246 - 0900 Fax Number (215) 246 - 0959

URGENT!!!!!

URGENT!!!!!

URGENT!!!!!

JULY 23, 2003

RONALD P. BOYLES
RONALD P. BOYLES, JR. AND BILL BOYLES VS JAMES COLLINS, ET AL

DONNELLY & ASSOCIATES
RICHARD J. LANDRY, ESQ. - (610) 892-7699

We have been requested by the above-mentioned counsel to obtain material on an expedited basis from the below listed custodians. In order to comply with this request we must have your signature indicating that you waive the twenty-day notice period provided in Rules 4009.21 and 4009.22. Please fax this form to us immediately at (215) 246-0959 with your signature so that we may comply with this request.

Your cooperation would be greatly appreciated.

Sincerely,

SAKINAH PRICE

Custodians:

Gregg L. CALDWELL CHIROPRACTOR - MEDICAL RECORDS
CAPATCH CHIROPRACTIC CENTER - MEDICAL RECORDS
John E. DUBOIS, III - MEDICAL RECORDS

Counsel:

ALVIN F. DELEVIE, ESQ. (215) 351-0257
I agree to waive waiting period 7/28/03 Date: 7/28/03

Copies: Yes No I agree to pay the invoice provided with the documents
I do not agree to waive rule: _____ Date: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

GREGG L. CALDWELL CHIROPRACTOR MEDICAL RECORDS
CAPATCH CHIROPRACTIC CENTER MEDICAL RECORDS
JOHN E. DUBOIS, III MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: **CUSTODIAN OF RECORDS FOR; GREGG L. CALDWELL CHIROPRACTOR**
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC., 1601 MARKET ST., #800, PHILA., PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD LANDRY, ESQ.

ADDRESS: 100 WEST ELM ST., STE. 101
CONSHOHOCKEN, PA 19428

TELEPHONE: 215-246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

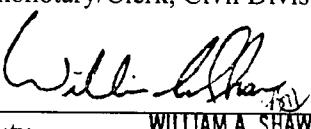
BY THE COURT:

JUL 30 2003

DATE: Thursday, July 17, 2003

Seal of the Court

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy **WILLIAM A. SHAW**
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**GREGG L. CALDWELL CHIROPRACTOR
1243 SKYTOP MOUNTAIN RD.**

PORT MATILDA, PA 16870

**RE: 7213
RONALD P. BOYLES**

Entire medical file, including but not limited to any and all records, correspondence to and from the consulting and treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 07/23/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

GREGG L. CALDWELL CHIROPRACTOR MEDICAL RECORDS
CAPATCH CHIROPRACTIC CENTER MEDICAL RECORDS
JOHN E. DUBOIS, III MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.
MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR; CAPATCH CHIROPRACTIC CENTER

(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC., 1601 MARKET ST., #800, PHILA., PA 19103

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD LANDRY, ESQ.

ADDRESS: 100 WEST ELM ST., STE. 101

CONSHOHOCKEN, PA 19428

TELEPHONE: 215-246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

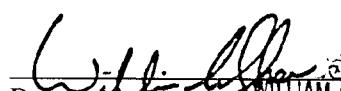
July 30, 2003

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, July 17, 2003

Seal of the Court


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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

CAPATCH CHIROPRACTIC CENTER
STAR ROUTE 53

KYLERTOWN, PA 16847

RE: 7213
RONALD P. BOYLES

Entire medical file, including but not limited to any and all records, correspondence to and from the consulting and treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis or treatment pertaining to:

Dates Requested: up to and including the present.
Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 07/23/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

GREGG L. CALDWELL CHIROPRACTOR MEDICAL RECORDS
CAPATCH CHIROPRACTIC CENTER MEDICAL RECORDS
JOHN E. DUBOIS, III MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.
MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: **CUSTODIAN OF RECORDS FOR; JOHN E DUBOIS, III**

(Name of Person or Entity)

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

SEE ATTACHED

~~MCS GROUP INC., 1601 MARKET ST., #800, PHILA., PA 19103~~

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: **RICHARD LANDRY, ESQ.**

ADDRESS: **100 WEST ELM ST., STE. 101**

CONSHOHOCKEN, PA 19428

TELEPHONE: **215-246-0900**

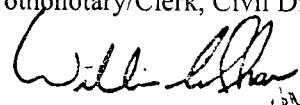
SUPREME COURT ID# **DEFENDANT**

ATTORNEY FOR: _____

BY THE COURT:

jul 30 2003

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

JOHN E. DUBOIS, III
9 BEAVER DRIVE

DUBOIS, PA 15801

RE: 7213
RONALD P. BOYLES

Entire medical file, including but not limited to any and all records, correspondence to and from the consulting and treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis or treatment pertaining to:

Dates Requested: up to and including the present.
Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

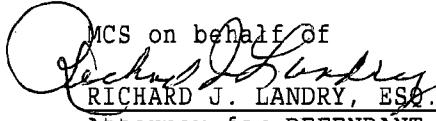
IN THE MATTER OF: COURT OF COMMON PLEAS
RONALD P. BOYLES, JR. AND BILL BOYLES TERM,
-VS- CASE NO: 01-1087-CD
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 08/12/2003


MCS on behalf of
RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

FILED

AUG 14 2003

William A. Shaw
Prothonotary/Clerk of Courts

DE11-437294 O 7213 - L15

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.

Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

*

Vs.
James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

*

No. 2001-01087-CD

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

TO: CUSTODIAN OF RECORDS FOR: STEVEN B. WOLF, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, #800, PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

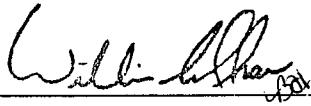
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: RICHARD J. LANDRY, ESQ.
ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN, PA 19428
TELEPHONE: (215) 246-0900
SUPREME COURT ID #
ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Monday, July 14, 2003
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

STEVEN B. WOLF, M.D.
ORTHOPEDIC INSTITUTE
875 POPLAR CHURCH RD

CAMP HILL, PA 17011

RE: 7213
RONALD P. BOYLES

INCLUDING ANY AND ALL RECORDS OF ANY KIND BEFORE AND AFTER THE SUBJECT'S 1/1/00 ACCIDENT; FROM 1990 TO PRESENT.

Entire medical, billing, and diagnostic file, including but not limited to any and all records, correspondence to and from the consulting and/or treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, medical billing and payment records, x-ray films and tests with subsequent reports, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, consultation, diagnosis, care or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 08/12/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.

Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

*

No. 2001-01087-CD

4

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

TO: CUSTODIAN OF RECORDS FOR: SUSQUEHANNA VALLEY SURGERY CTR.
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, #800 PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Monday, July 14, 2003

Seal of the Court

Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

SUSQUEHANNA VALLEY SURGERY CTR
4310 LONDONDERRY RD.

HARRISBURG,, PA 17109

RE: 7213
RONALD P. BOYLES

INCLUDING ANY AND ALL RECORDS OF ANY KIND BEFORE AND AFTER THE SUBJECT'S 1/1/00 ACCIDENT; FROM 1990 TO PRESENT.

Entire medical, billing, and diagnostic file, including but not limited to any and all records, correspondence to and from the consulting and/or treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, medical billing and payment records, x-ray films and tests with subsequent reports, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, consultation, diagnosis, care or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 08/12/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.

Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

*

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

TO: CUSTODIAN OF RECORDS FOR: CENTRAL PENN REHAB ASSOC.
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, #800 PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.
ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN PA 19428
TELEPHONE: (215)246-0900
SUPREME COURT ID #
ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, July 14, 2003
Seal of the Court


Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

CENTRAL PENN REHAB ASSOC.
1520 MARTIN STREET

STATE COLLEGE, PA 16803

RE: 7213
RONALD P. BOYLES

INCLUDING ANY AND ALL RECORDS OF ANY KIND BEFORE AND AFTER THE SUBJECT'S 1/1/00 ACCIDENT; FROM 1990 TO PRESENT.

Entire medical, billing, and diagnostic file, including but not limited to any and all records, correspondence to and from the consulting and/or treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, medical billing and payment records, x-ray films and tests with subsequent reports, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, consultation, diagnosis, care or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 08/12/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

*

Vs.
James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

*

No. 2001-01087-CD

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

TO: CUSTODIAN OF RECORDS FOR: BOYLES INSURANCE, INC.
(Name of Person or Entity)

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

MCS GROUP INC, 1601 MARKET STREET, #800 , PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

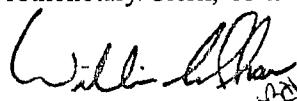
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: RICHARD J. LANDRY, ESQ.
ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN PA 19428
TELEPHONE: (215) 246-0900
SUPREME COURT ID #
ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Monday, July 14, 2003
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

BOYLES INSURANCE, INC.
11 NICHOLS ST.

CLEARFIELD, PA 16830

RE: 7213
RONALD P. BOYLES

*****SEE ATTACHED*****

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF: COURT OF COMMON PLEAS
RONALD P. BOYLES, JR. AND BILL BOYLES TERM,
-VS- CASE NO: 01-1087-CD
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 08/12/2003 MCS on behalf of
RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

11

No. 2001-01087-CD

James Collins, individually and t/a

11

James Collins, Inc. d/b/a and/or
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: SCOTT J. MAKKOVEC
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, #800, PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: RICHARD J. LANDRY, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101

CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, July 14, 2003

Seal of the Court

Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

SCOTT J. MAKKOVEC
22 S. VERNON ST.

YORK, PA

RE: 7213
RONALD P. BOYLES

ANY AND ALL RECORDS OF ANY KIND RELATING TO SUBJECT, INCLUDING BUT NOT LIMITED TO ANY AND ALL TAX RETURNS, SUPPORTING DOCUMENTS & SCHEDULES.

Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of RICHARD J. LANDRY, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 08/12/2003

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

[Note: see enclosed list of locations]

TO: ALVIN F. DELEVIE, ESQ.
MCS on behalf of RICHARD J. LANDRY, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 07/23/2003

MCS on behalf of

RICHARD J. LANDRY, ESQ.
Attorney for DEFENDANT

CC: RICHARD J. LANDRY, ESQ. - BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

LOCATION NAME	RECORDS REQUESTED
STEVEN B. WOLF, M.D.	MEDICAL, BILLING, AND X-RAY(S)
SUSQUEHANNA VALLEY SURGERY CTR	MEDICAL, BILLING, AND X-RAY(S)
CENTRAL PENN REHAB ASSOC.	MEDICAL, BILLING, AND X-RAY(S)
BOYLES INSURANCE, INC.	OTHER
SCOTT J. MAKKOVEC	OTHER
ERIE INSURANCE GROUP	INSURANCE

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Ronald P. Boyles Jr., and
Jill Boyles, husband and wife
Plaintiff(s)

James Collins, individually and t/a
The Collins Car Wash,
The Collins Rainbow Car Wash and
The Rainbow Car Wash
Defendant(s)

2

No. 2001-01087-CD

11

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

TO: CUSTODIAN OF RECORDS FOR:ERIE INSURANCE GROUP
(Name of Person or Entity)

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

MCS GROUP INC, 1601 MARKET STREET, #800 , PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

BY THE COURT;

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Monday, July 14, 2003
Seal of the Court

Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**ERIE INSURANCE GROUP
P. O. BOX 999**

JOHNSTOWN, PA 15907

**RE: 7213
RONALD P. BOYLES**

GROUP #010100052022; ANY AND ALL PIP FILES OF ANY KIND FROM 1/1/90 TO PRESENT.

Any and all insurance records and PIP files, including but not limited to medical reports and/or records, claims, any and all correspondence, documentation supporting plaintiff's claim, payments including dates of payments, payee and reasons for payments, including any and all such items stored in a computer database or otherwise in electronic form, pertaining to:

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686**

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

Date of Loss: 01/01/2000

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

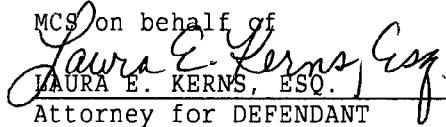
CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

FILED

MCS on behalf of LAURA E. KERNIS, ESQ.
certifies that

OCT 10 2003
m/2003
William A. Shaw
Prothonotary/Clerk of Courts
L CER to
mcs


- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 10/06/2003

MCS on behalf of
LAURA E. KERNIS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

DAVID L. KULLING, M.D.

MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/16/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Ronald P. Boyles Jr.

Jill Boyles

Plaintiff(s)

vs

2

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: DAVID L. KULLING, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800 , PHILA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNS, ESO.

ADDRESS: 100 WEST ELM STREET, SUITE 101
CONSHOHOCKEN PA 19428

TELEPHONE: (215) 246-0900

TELEPHONE: (213) 2

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

10/06/2003
DATE: Thursday, September 11, 2003
Seal of the Court

W. H. G.

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**DAVID L. KULLING, M.D.
807 TURNPIKE AVENUE**

CLEARFIELD, PA 16830

**RE: 7213
RONALD P. BOYLES**

Please call for prior approval for fees in excess of \$100.00 for hospitals, \$50.00 for all other providers.

Entire medical file, including but not limited to any and all records correspondence to and from the consulting and treating physicians, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 10/08/2003

MCS on behalf of
laura e. kerns, esq.
LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

FILED
m/12/03 No CC
OCT 14 2003 EPL
William A. Shaw
Prothonotary/Clerk of Courts

DE11-453649 07213-L28

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

HEALTH SOUTH

MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/18/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**HEALTH SOUTH
1522 MARTIN STREET**

STATE COLLEGE, PA 16803

**RE: 7213
RONALD P. BOYLES**

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Entire medical file, including but not limited to any and all records,
correspondence to and from the consulting and treating physicians, files,
memoranda, handwritten notes, history and physical reports, medication/
prescription records, including any and all such items as may be stored in a
computer database or otherwise in electronic form, relating to any examination,
diagnosis or treatment pertaining to:**

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 10/06/2003

Lauren E. Kerns, Esq.
MCS on behalf of
LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

FILED
m 12.53 2003
OCT 14 2003
cc
EKA
William A. Shaw
Prothonotary/Clerk of Courts

DE11-453403 07213-L25

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

611 OPEN MRI
CENTRE COMMUNITY HOSPITAL
GEISINGER MEDICAL CENTER

MRI FILM ONLY
ANY AND ALL DIAGNOSTIC FILMS
ANY AND ALL DIAGNOSTIC FILMS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/15/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: 611 OPEN MRI

(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800 , PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNS, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101

CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

OCT 07 2003

DATE: Thursday, September 11, 2003

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**611 OPEN MRI
611 UNIVERSITY DRIVE**

STATE COLLEGE, PA 16801

**RE: 7213
RONALD P. BOYLES**

ANY & ALL MRI'S FOR DATES 2/17/00 & 10/17/2002

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

Any and all MRI films and reports, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, diagnosis, consultation, care and/or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 10/06/2003

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

611 OPEN MRI
CENTRE COMMUNITY HOSPITAL
GEISINGER MEDICAL CENTER

MRI FILM ONLY
ANY AND ALL DIAGNOSTIC FILMS
ANY AND ALL DIAGNOSTIC FILMS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/15/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

*

James Collins

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: CENTRE COMMUNITY HOSPITAL
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800 , PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNS, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

OCT 07 2003

DATE: Thursday, September 11, 2003

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CENTRE COMMUNITY HOSPITAL
1800 E. PARK AVE**

STATE COLLEGE, PA 16801

**RE: 7213
RONALD P. BOYLES**

ANY & ALL FILMS FROM 9/4/99 TO PRESENT.

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Any and all diagnostic films and tests, including but not limited to MRI films,
CAT scans, EEGs, EKGs, EMGs, and subsequent reports, including any and all such
items as may be stored in a computer database or otherwise in electronic form,
pertaining to:**

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF: COURT OF COMMON PLEAS
RONALD P. BOYLES, JR. AND BILL BOYLES TERM,
-VS- CASE NO: 01-1087-CD
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNIS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 10/06/2003 MCS on behalf of
LAURA E. KERNIS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

611 OPEN MRI
CENTRE COMMUNITY HOSPITAL
GEISINGER MEDICAL CENTER

MRI FILM ONLY
ANY AND ALL DIAGNOSTIC FILMS
ANY AND ALL DIAGNOSTIC FILMS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/15/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: GEISINGER MEDICAL CENTER
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800 , PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNS, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101

CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

OCT 07 2003

DATE: Thursday, September 11, 2003

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**GEISINGER MEDICAL CENTER
100 N. ACADEMY AVENUE**

DANVILLE, PA 17821

**RE: 7213
RONALD P. BOYLES**

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Any and all diagnostic films and tests, including but not limited to MRI films,
CAT scans, EEGs, EKGs, EMGs, and subsequent reports, including any and all such
items as may be stored in a computer database or otherwise in electronic form,
pertaining to:**

Dates Requested: up to and including the present.

**Subject : RONALD P. BOYLES
RR3 BOX 240, TYRONE, PA 16686
Social Security #: 169-62-3271
Date of Birth: 04-22-1967**

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF: COURT OF COMMON PLEAS
RONALD P. BOYLES, JR. AND BILL BOYLES TERM,
-VS- CASE NO: 01-1087-CD
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 09/30/2003

FILED

OCT 17 2003
William A. Shaw
Prothonotary/Clerk of Courts

Laura E. Kerns, Esq.
MCS on behalf of
LAURA E. KERNS, ESQ.
Attorney for DEFENDANT



1601 Market Street, Suite 800, Philadelphia Pennsylvania 19103
(215) 246 - 0900 Fax Number (215) 246 - 0959

URGENT!!!!

URGENT!!!!

URGENT!!!!

SEPTEMBER 30, 2003

RONALD P. BOYLES

DONNELLY & ASSOCIATES
LAURA E. KERNS, ESO. - (610) 892-7699

We have been requested by the above-mentioned counsel to obtain material on an expedited basis from the below listed custodians. In order to comply with this request we must have your signature indicating that you waive the twenty-day notice period provided in Rules 4009.21 and 4009.22. Please fax this form to us immediately at (215) 246-0959 with your signature so that we may comply with this request.

Your cooperation would be greatly appreciated.

Sincerely,

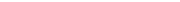
SAKINAH PRICE

Custodians:

HOLY SPIRIT HOSPITAL
KERRY J. THOMPSON, M.D.
DR. LORI DUNN

- MEDICAL RECORDS
- X-RAY ONLY
- MEDICAL RECORDS & XRAYS
- MEDICAL RECORDS & XRAYS

Counsel:

ALVIN F. DELEVIE, ESQ. (215) 351-0257
I agree to waive waiting period  Date: 10/8/03

Copies: Yes No I agree to pay the invoice provided with the documents

I do not agree to waive rule: _____ Date: _____

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

HOLY SPIRIT HOSPITAL	MEDICAL RECORDS
HOLY SPIRIT HOSPITAL	X-RAY ONLY
KERRY J. THOMPSON, M.D.	MEDICAL RECORDS & XRAYS
DR. LORI DUNN	MEDICAL RECORDS & XRAYS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/30/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**HOLY SPIRIT HOSPITAL
503 NORTH 21ST STREET**

CAMP HILL, PA 17011

**RE: 7213
RONALD P. BOYLES**

Please call for prior approval for fees in excess of \$100.00 for hospitals, \$50.00 for all other providers.

Entire hospital medical file, including but not limited to any and all records, correspondence to and from the consulting and/or treating physician, files, memoranda, handwritten notes, history and physical reports, medication/prescription records, nurse's notes, doctor's comments, dietary restrictions, and all patient consent or refusal of treatment, procedures, test, and/or medication, lab and diagnostic test results, including any and all such items as may be stored in a computer database or otherwise in electronic form, relating to any examination, consultation, diagnosis, care, treatment, admission, discharge, or emergency care pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 09/30/2003

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

HOLY SPIRIT HOSPITAL
HOLY SPIRIT HOSPITAL
KERRY J. THOMPSON, M.D.
DR. LORI DUNN

MEDICAL RECORDS
X-RAY ONLY
MEDICAL RECORDS & XRAYS
MEDICAL RECORDS & XRAYS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/30/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**HOLY SPIRIT HOSPITAL
503 NORTH 21ST STREET**

CAMP HILL, PA 17011

**RE: 7213
RONALD P. BOYLES**

INCLUDING DIAGNOSTIC FILMS AND A CT MYELOGRAM.

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Any and all x-ray films and reports, including any and all such items as may
be stored in a computer database or otherwise in electronic form,
pertaining to:**

**Dates Requested: up to and including the present.
Subject : RONALD P. BOYLES**

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

IN THE MATTER OF:

RONALD P. BOYLES, JR. AND BILL BOYLES

COURT OF COMMON PLEAS

TERM,

-VS-

JAMES COLLINS, ET AL

CASE NO: 01-1087-CD

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
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- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of

DATE: 09/30/2003

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

HOLY SPIRIT HOSPITAL	MEDICAL RECORDS
HOLY SPIRIT HOSPITAL	X-RAY ONLY
KERRY J. THOMPSON, M.D.	MEDICAL RECORDS & XRAYS
DR. LORI DUNN	MEDICAL RECORDS & XRAYS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/30/2003

MCS on behalf of

LAURA E. KERNS, ESQ.

Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: KERRY J. THOMPSON, M.D.
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800, PHILADELPHIA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNIS, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

OCT 13 2003

DATE: Friday, September 26, 2003

Seal of the Court


Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**KERRY J. THOMPSON, M.D.
ANNE ARUNDEL MED. CTR.
64 FRANKLIN ST.**

ANNAPOLIS, MD 21401

**RE: 7213
RONALD P. BOYLES**

INCLUDING A DISCOGRAM

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Entire medical, billing, and diagnostic file, including but not limited to
any and all records, correspondence to and from the consulting and/or treating
physicians, files, memoranda, handwritten notes, history and physical reports,
medication/prescription records, medical billing and payment records, x-ray
films and tests with subsequent reports, including any and all such items as
may be stored in a computer database or otherwise in electronic form, relating
to any examination, consultation, diagnosis, care or treatment pertaining to:**

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF: COURT OF COMMON PLEAS
RONALD P. BOYLES, JR. AND BILL BOYLES TERM,
-VS- CASE NO: 01-1087-CD
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party prior to the date on which the subpoena is sought to be served,
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- (3) The parties have waived the twenty-day notice provided in Rules 4009.21 and 4009.22 and,
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

MCS on behalf of
DATE: 09/30/2003 LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

HOLY SPIRIT HOSPITAL

MEDICAL RECORDS

HOLY SPIRIT HOSPITAL

X-RAY ONLY

KERRY J. THOMPSON, M.D.

MEDICAL RECORDS & XRAYS

DR. LORI DUNN

MEDICAL RECORDS & XRAYS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 09/30/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**DR. LORI DUNN
4310 LONDONDERRY ROAD
SUSQUEHANNA VALLEY**

HARRISBURG, PA 17109

**RE: 7213
RONALD P. BOYLES**

INCLUDE A DISCOGRAM

**Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.**

**Entire medical, billing, and diagnostic file, including but not limited to
any and all records, correspondence to and from the consulting and/or treating
physicians, files, memoranda, handwritten notes, history and physical reports,
medication/prescription records, medical billing and payment records, x-ray
films and tests with subsequent reports, including any and all such items as
may be stored in a computer database or otherwise in electronic form, relating
to any examination, consultation, diagnosis, care or treatment pertaining to:**

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

CERTIFICATE

PREREQUISITE TO SERVICE OF A SUBPOENA

PURSUANT TO RULE 4009.22

FILED

NOV 24 2003

William A. Shaw
Prothonotary/Clerk of Courts

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

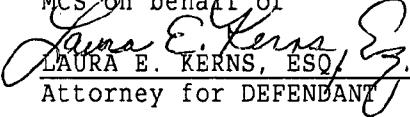
JAMES COLLINS, ET AL

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

MCS on behalf of LAURA E. KERNS, ESQ.
certifies that

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) No objection to the subpoena has been received, and
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

DATE: 11/20/2003

MCS on behalf of

LAURA E. KERNS, ESQ.
Attorney for DEFENDANT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

RONALD P. BOYLES, JR. AND BILL BOYLES

TERM,

-VS-

CASE NO: 01-1087-CD

JAMES COLLINS, ET AL

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

ANNAPOLIS RADIOLOGISTS ASSOC. MEDICAL RECORDS

TO: ALVIN F. DELEVIE, ESQ.

MCS on behalf of LAURA E. KERNS, ESQ. intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served. Complete copies of any reproduced records may be ordered at your expense by completing the attached counsel card and returning same to MCS or by contacting our local MCS office.

DATE: 10/31/2003

MCS on behalf of

LAURA E. KERNS, ESQ.

Attorney for DEFENDANT

CC: LAURA E. KERNS, ESQ.

- BOYLES

-

Any questions regarding this matter, contact

THE MCS GROUP INC.
1601 MARKET STREET
#800
PHILADELPHIA, PA 19103
(215) 246-0900

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Ronald P. Boyles Jr

*

Jill Boyles

Plaintiff(s)

Vs.

*

No. 2001-01087-CD

James Collins

*

The Collins Car Wash

The Collins Rainbow Car Wash

The Rainbow Car Wash

Defendant(s)

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

TO: CUSTODIAN OF RECORDS FOR: ANNAPOLIS REDIOLOGISTS ASSOC
(Name of Person or Entity)

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

SEE ATTACHED

MCS GROUP INC, 1601 MARKET STREET, STE 800 ,PHILA PA 19103
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: LAURA E. KERNS, ESQ.

ADDRESS: 100 WEST ELM STREET, STE 101
CONSHOHOCKEN PA 19428

TELEPHONE: (215)246-0900

SUPREME COURT ID #

ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

11/20/2003
DATE: Wednesday, October 29, 2003

Seal of the Court

Deputy

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

ANNAPOLEIS RADIOLOGISTS ASSOC.
BROWN, CROFT & FRAZIER, P.A
PO BOX 2902

ANNAPOLEIS, MD 21404

RE: 7213
RONALD P. BOYLES

Please call for prior approval for fees in excess of \$100.00 for hospitals,
\$50.00 for all other providers.

Entire medical file, including but not limited to any and all records,
correspondence to and from the consulting and treating physicians, files,
memoranda, handwritten notes, history and physical reports, medication/
prescription records, including any and all such items as may be stored in a
computer database or otherwise in electronic form, relating to any examination,
diagnosis or treatment pertaining to:

Dates Requested: up to and including the present.

Subject : RONALD P. BOYLES

RR3 BOX 240, TYRONE, PA 16686

Social Security #: 169-62-3271

Date of Birth: 04-22-1967

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

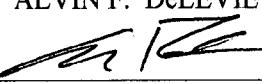
Defendants,

ORDER TO SETTLE, DISCONTINUE AND END

To the Prothonotary:

Kindly mark this action settled, discontinued and ended upon payment of your costs only.

Dated: 5/06/04

BY: 

ALVIN F. DeLEVIE & ASSOCIATES

ALVIN F. DeLEVIE, ESQUIRE

Attorney for Plaintiffs

Attorney I.D. No.: 23245

FILED

M 10:24 AM 1004 Court to attorney

Copy to CJA

MAY 27 2004



William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Ronald P. Boyles Jr
Jill Boyles

VS.
James Collins
The Collins Car Wash
The Collins Rainbow Car Wash
The Rainbow Car Wash

No. 2001-01087-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 May 27, 2004, marked:

Discontinued, settled and ended.

Record costs in the sum of \$143.63 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 27th day of May A.D. 2004.

William A. Shaw, Prothonotary

*** TRANSMISSION REPORT ***

May 25 '04 13:21

DATE	START	TIME	PARTNER	MODE	PAGE	RESULT
May 25	13:20	1'03	3423145	G3	01	OK

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

RONALD P. BOYLES, JR., and
JILL BOYLES, h/w

Plaintiff,

NO. 01-1087-CD

vs.

JAMES COLLINS, Individually and t/a
THE COLLINS CAR WASH, THE COLLINS
RAINBOW CAR WASH and THE RAINBOW
CAR WASH

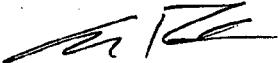
Defendants,

ORDER TO SETTLE, DISCONTINUE AND END

To the Prothonotary:

Kindly mark this action settled, discontinued and ended upon payment of your costs only.

Dated: 5/06/04

BY: 

ALVIN F. DeLEVIE & ASSOCIATES

ALVIN F. DeLEVIE, ESQUIRE

Attorney for Plaintiffs

Attorney I.D. No.: 23245

FILED

JUN 01 2004

William A. Shaw
Prothonotary

FILED
in 2:26 MA, copy to CCA

JUN 01 2004

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Ronald P. Boyles Jr
Jill Boyles

Vs. No. 2001-01087-CD
James Collins
The Collins Car Wash
The Collins Rainbow Car Wash
The Rainbow Car Wash

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 1, 2004, marked:

Discontinued, settled and ended.

Record costs in the sum of \$143.63 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 1st day of June A.D. 2004.

William A. Shaw, Prothonotary

		the Clearfield & Mahoning Railroad Company	
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131	08/09/00	Preliminary Objections to Plaintiffs' Second Amended Complaint	10
132	08/21/00	Affidavit of Service, Plaintiffs' Second Amended Complaint upon David R. Irvin	05
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134	08/31/00	Plaintiffs' Answer to Preliminary Objections of Defendants CSX Transportation Company and Buffalo Rochester & Pittsburgh Railway Company	08
135	08/31/00	Plaintiffs' Answer to Preliminary Objections of Defendant the Clearfield & Mahoning Railroad Co.	06
136	09/05/00	Preliminary Objections	20
137	09/05/00	Plaintiffs' Answer to Preliminary Objections of Defendant Buffalo & Pittsburgh Railway Company	06
138	09/06/00	Certificate of Service, Preliminary Objections to Plaintiffs' Second Amended Complaint and Brief	01
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140	09/14/00	Certificate of Service, Notice to Attend	04
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148	12/06/00	Plaintiffs' Motion to Compel Long Overdue Discovery by the Corman Defendants	74
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150	12/13/00	Answer of Plaintiffs to Motion to Strike and Request for Counsel Fees on Behalf of Defendants, R.J. Corman Railway Company/Pennsylvania Lines, Inc. and Richard J. Corman	06
151	12/13/00	Answer of Plaintiffs to Defendants Buffalo, Rochester & Pittsburgh Railway Company's and CSX Transportation, Inc.'s Reply and Motion to Strike Plaintiffs' Post Argument Submission	36
152	12/21/00	Deposition (Examination) of Mark W. Hastings held July 10, 2000	Separate Cover
153	12/21/00	Deposition (Examination) of James D. McGeehan held September 25, 2000	Separate Cover
154	12/21/00	Deposition of John Gibson (Certified Copy) held July 27, 2000	Separate Cover
155	12/21/00	Deposition of Patricia J. Afoora (Certified Copy) held July 27, 2000	Separate Cover
156	12/21/00	Deposition (Pretrial Examination) of R. Paul Carey held July 10, 2000	Separate Cover
157	12/22/00	Order, Re: Defendant's Motion to Strike Plaintiffs' Post Argument Submission	04
158	12/26/00	Transcript of Videotaped Deposition of Frank Laird taken 9/19/00	Separate Cover
C 159	12/26/00	Praecipe, Entry of Letter to Alderson Reporting Company	04
160	01/26/01	Opinion and Order	15
161	02/09/01	Motion of Plaintiffs for Partial Reconsideration of Court's January 26, 2001 Opinion and Order	33
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