

01-1162-CD

Tabitha Rozyle vs Cori Minns

01

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
JUDICIAL DISTRICT


FROM

DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No. 01-1162-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

| | | | |
|---|---|--|----------------|
| NAME OF APPELLANT Cori M. Minns | | MAG. DIST. NO. OR NAME OF D.J. Patrick N. Ford | |
| ADDRESS OF APPELLANT 31 Short Street, Falls Creek, PA 15840 | | CITY | STATE ZIP CODE |
| DATE OF JUDGMENT July 5, 2001 | IN THE CASE OF (Plaintiff) Rozyle, Tabitha vs. Minns, Cori M. (Defendant) | | |
| CLAIM NO. CV# 0000196-01 LT 19 | SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT  | | |

This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.

This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.

Signature of Prothonotary or Deputy

If appellant was Claimant (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

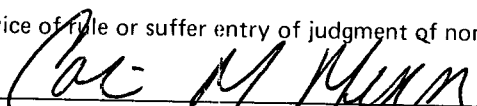
(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon Tabitha Rozyle

Name of appellee(s)

(Common Pleas No. 01-1162-CD) within twenty (20) days after service of rule or suffer entry of judgment of non pros.


Signature of appellant or his attorney or agent

RULE: To Tabitha Rozyle, appellee(s)
Name of appellee(s)

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: July 19, 2001


Signature of Prothonotary or Deputy

FILED

JUL 19 2001

William A. Shaw
Prothonotary

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____ ; ss

AFFIDAVIT: I hereby swear or affirm that I served

- ☐ a copy of the Notice of Appeal, Common Pleas No. _____, upon the District Justice designated therein on
(date of service) _____, 19____, ☐ by personal service ☐ by (certified) (registered) mail, sender's
receipt attached hereto, and upon the appellee, (name) _____, on
_____, 19____ ☐ by personal service ☐ by (certified) (registered) mail, sender's receipt attached hereto.
- ☐ and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to
whom the Rule was addressed on _____, 19____, ☐ by personal service ☐ by (certified) (registered)
mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME
THIS _____ DAY OF _____, 19____.

Signature of affiant

Signature of official before whom affidavit was made

Title of official

My commission expires on _____, 19____.

Mag. Dist. No.:

46-3-01

DJ Name: Hon.

PATRICK N. FORD

Address: **309 MAPLE AVENUE**

P.O. BOX 452

DUBOIS, PA

Telephone: **(814) 371-5321** **15801**

PATRICK N. FORD
309 MAPLE AVENUE
P.O. BOX 452
DUBOIS, PA 15801

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

NAME and ADDRESS

ROZYLE, TABITHA
17 S STOCKDALE ST
DUBOIS, PA 15801

VS.

DEFENDANT:

NAME and ADDRESS

MINNS, CORI M
31 SHORT STREET
FALLS CREEK, PA 15840

Docket No.: **CV-0000196-01**
Date Filed: **5/09/01**



THIS IS TO NOTIFY YOU THAT:

Judgment:

FOR PLAINTIFF



Judgment was entered for:

(Name)

ROZYLE, TABITHA



Judgment was entered against:

(Name)

MINNS, CORI M

in the amount of \$ 1,970.00 on:

(Date of Judgment)

7/05/01



Defendants are jointly and severally liable.

(Date & Time)



Damages will be assessed on:



This case dismissed without prejudice.



Amount of Judgment Subject to

Attachment/Act 5 of 1996 \$ _____



Levy is stayed for _____ days or ☐ generally stayed.



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

| | |
|---------------------------------|---------------------------|
| Amount of Judgment | \$ <u>1,900.00</u> |
| Judgment Costs | \$ <u>70.00</u> |
| Interest on Judgment | \$ <u>.00</u> |
| Attorney Fees | \$ <u>.00</u> |
| Total | \$ <u>1,970.00</u> |
| Post Judgment Credits | \$ _____ |
| Post Judgment Costs | \$ _____ |
| Certified Judgment Total | \$ _____ |

Date:

Place:

Time:

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

7-5-01

Date

Patrick N. Ford - PNF

, District Justice

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

Date

, District Justice

My commission expires first Monday of January,

2006

SEAL

7.

FILED

[Signature]
JUL 19 2001
11:29:50 AM
William A. Shaw
Prothonotary

cc to Atty Torretti
\$88.00

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

TABITHA ROZYLE, an
individual,
Plaintiff

vs .

Cori M. Minns, an individual,
Defendant

:
: CIVIL DIVISION
:
: No. 2001-01162-CD
:
:
:
: Type of Pleading:
: Affidavit of Service
:
: Filed on Behalf of:
: Defendant
:
:
:
:
: Counsel of Record for this
: Party:
:
: Querino R. Torretti, Esquire
: Supreme Court I.D. No. 23996
: 600 East Main Street
: P.O. Box 218
: Reynoldsville, PA 15851
: (814) 653-2243

FILED

JUL 27 2001

William A. Shaw
Prothonotary

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
JUDICIAL DISTRICT

FROM

DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No. 01-1162-00

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

| | | | |
|---|--|---|----------------|
| NAME OF APPELLANT Cori M. Minns | | MAG. DIST. NO. OR NAME OF D.J. Patrick N. Ford | |
| ADDRESS OF APPELLANT 31 Short Street, Falls Creek, PA 15840 | | CITY | STATE ZIP CODE |
| DATE OF JUDGMENT July 5, 2001 | IN THE CASE OF (Plaintiff) Rozyle, Tabitha vs. Minns, Cori M. (Defendant) | | |
| CLAIM NO. CV# 0000196-01 LT 19 | SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT <i>Cori M Minns</i> | | |
| <p>This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.</p> <p>This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.</p> <p>_____ Signature of Prothonotary or Deputy</p> | | <p>If appellant was Claimant (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.</p> | |

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon Tabitha Rozyle, appellee(s), to file a complaint in this appeal
(Common Pleas No. 01-1162-00) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

RULE: To Tabitha Rozyle, appellee(s)

Cori M Minns
Signature of appellant or his attorney or agent

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: July 19, 2001

William L. Shaw
Signature of Prothonotary or Deputy

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

JUL 19 2001

Attest.

William L. Shaw
Prothonotary

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF JEFFERSON ; ss

AFFIDAVIT: I hereby swear or affirm that I served

☐ a copy of the Notice of Appeal, Common Pleas No. 2001-01162-CD, on the District Justice designated therein on
(date of service) July 23, ~~xx~~ 2001 ☐ by personal service ☒ by (certified) (registered) mail, sender's
receipt attached hereto, and upon the appellee, (name) Tabitha Rozyle, on
July 23, ~~xx~~ 2001 ☐ by personal service ☒ by (certified) (registered) mail, sender's receipt attached hereto.

☒ and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to
whom the Rule was addressed on July 23, ~~xx~~ 2001 ☐ by personal service ☒ by (certified) (registered)
mail, sender's receipt attached hereto.

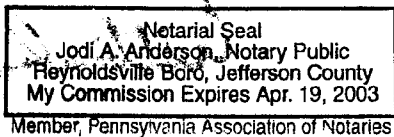
SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME
THIS 23rd DAY OF July, ~~xx~~ 2001

Jodi A. Anderson
Signature of official before whom affidavit was made

Notary Public
Title of official

My commission expires on April 19, ~~xx~~ 2003

[Signature]
Signature of affiant



7000 0600 0028 4732 3574

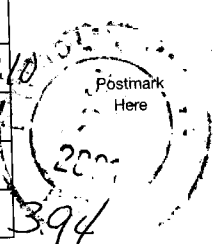
U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

Patrick N Ford

| | |
|---|-------------------------|
| Postage | \$ 34 |
| Certified Fee | 1.40 2.10 |
| Return Receipt Fee (Endorsement Required) | 1.50 |
| Restricted Delivery Fee (Endorsement Required) | |
| Total Postage & Fees | \$ 3.74 3.94 |



Recipient's Name (Please Print Clearly) (to be completed by mailer)
Patrick N. Ford DJ
Street, Apt. No., or PO Box No.
309 Maple Ave PO Box 452
City, State, ZIP+4
Dubois Pa 15801

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Tabitha Rozyle

| | |
|---|------------------------|
| Postage | \$ 34 |
| Certified Fee | 1.70 2.10 |
| Return Receipt Fee (Endorsement Required) | 1.50 |
| Restricted Delivery Fee (Endorsement Required) | 3.20 |
| Total Postage & Fees | \$6.94 7.14 |

Postmark
Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

* Tabitha Rozyle

Street, Apt. No., or PO Box No.

17 South Stockdale St

City, State, ZIP+4

DuBois PA 15801

PS Form 3800, February 2000

See Reverse for Instructions

7000 0600 0028 4732 3581

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may **ONLY** be combined with First-Class Mail or Priority Mail.
- Certified Mail is *not* available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, February 2000 (Reverse)

102595-99-M-2087

FILED

JUL 27 2001

WILLISOLLC atty

William A. Shaw
Prothonotary

Toutt

6/24

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.: **46-3-01**

DJ Name: Hon. **PATRICK N. FORD**

Address: **309 MAPLE AVENUE
P.O. BOX 452
DUBOIS, PA
15801**

Telephone: **(814) 371-5321** **15801**

**PATRICK N. FORD
309 MAPLE AVENUE
P.O. BOX 452
DUBOIS, PA 15801**

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF: NAME and ADDRESS
**ROZYLE, TABITHA
17 S STOCKDALE ST
DUBOIS, PA 15801**

VS.
DEFENDANT: NAME and ADDRESS
**MINNS, CORI M
31 SHORT STREET
FALLS CREEK, PA 15840**

Docket No.: **CV-0000196-01**
Date Filed: **5/09/01**



THIS IS TO NOTIFY YOU THAT:

Judgment:

FOR PLAINTIFF

01-1162-00

☒ Judgment was entered for: (Name) **ROZYLE, TABITHA**

☒ Judgment was entered against: (Name) **MINNS, CORI M**

in the amount of \$ **1,970.00** on: (Date of Judgment) **7/05/01**

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

☐ Damages will be assessed on: _____

☐ This case dismissed without prejudice. _____

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

☐ Levy is stayed for _____ days or ☐ generally stayed.

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

| | |
|--------------------------|--------------------|
| Amount of Judgment | \$ 1,900.00 |
| Judgment Costs | \$ 70.00 |
| Interest on Judgment | \$.00 |
| Attorney Fees | \$.00 |
| Total | \$ 1,970.00 |
| Post Judgment Credits | \$ _____ |
| Post Judgment Costs | \$ _____ |
| Certified Judgment Total | \$ _____ |

FILED

| | |
|-------|---|
| Date: | Place: |
| Time: | JUL 30 2001 01:10:50 PM William A. Shaw Prothonotary |

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

75-01 Date **Patrick N. Ford - PNF**, District Justice

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

_____, Date _____, District Justice

My commission expires first Monday of January,

2006

SEAL

CIVIL COMPLAINT

Mag. Dist. No.:

46-3-01

DJ Name: Hon.

PATRICK N. FORD

Address: **109 NORTH BRADY STREET**

P.O. BOX 452

DUBOIS, PA

15801

Telephone: **(814) 371-5321**

PLAINTIFF:

NAME and ADDRESS

Tabitha Rozyk
17 S. Stockdale St.
DUBOIS, PA 15801

VS.

DEFENDANT:

NAME and ADDRESS

Corri Minns
31 Short St.
FALLS CREEK, PA 15840

Docket No. **CV 196-01**

Date Filed:



| | AMOUNT | DATE PAID |
|---------------|----------------------|---------------------|
| FILING COSTS | \$ <u>70</u> | <u>1</u> / <u>1</u> |
| SERVING COSTS | \$ <u> </u> | <u>1</u> / <u>1</u> |
| TOTAL | \$ <u> </u> | <u>1</u> / <u>1</u> |

TO THE DEFENDANT: The above named plaintiff(s) asks judgment against you for \$ 3,000.00 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

In the day of June 7, 2000 Corri Minns had taken my vehicle without my permission. During this time she had damaged my vehicle. Corri had done a hit and run in the Shop + Save parking lot which had put damages on to my vehicle.

GO TO BACK →

I, Tabitha Rozyk verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.

Tabitha L. Rozyk
(Signature of Plaintiff or Authorized Agent)

Plaintiff's
Attorney:

Address:

Telephone:

IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT WILL BE ENTERED AGAINST YOU BY DEFAULT.

If you have a claim against the plaintiff which is within district justice jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing. If you have a claim against the plaintiff which is not within district justice jurisdiction, you may request information from this office as to the procedures you may follow. **If you are disabled and require assistance, please contact the Magisterial District office at the address above.**

This was investigated by the Dubois City Police and the Sandy Township Police. Corri told me that she would pay for the damages and has not yet done so. Her mother also agreed to pay for them and I not received anything towards the damages. So this would be the reasoning for me filling this suit against her.

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

TABITHA ROZYLE, an
individual,
Plaintiff

vs .

Cori M. Minns, an individual,
Defendant

FILED

AUG 06 2001

William A. Shaw
Prothonotary

:
: CIVIL DIVISION
:
: No. 2001-01162-CD
:
:
:
: Type of Pleading:
: Affidavit of Service
:
: Filed on Behalf of:
: Defendant
:
:
:
:
: Counsel of Record for this
: Party:
:
: Querino R. Torretti, Esquire
: Supreme Court I.D. No. 23996
: 600 East Main Street
: P.O. Box 218
: Reynoldsville, PA 15851
: (814) 653-2243

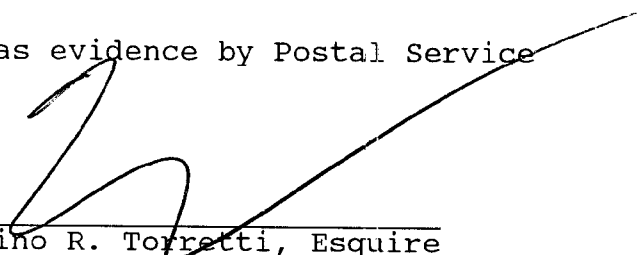
IN THE COURT OF COMMON PLEAS
OF JEFFERSON COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

| | |
|-------------------------------|---------------------|
| TABITHA ROZYLE, an | : |
| individual, | : |
| Plaintiff | : CIVIL DIVISION |
| | : |
| vs . | : No. 2001-01162-CD |
| | : |
| | : |
| Cori M. Minns, an individual, | : |
| Defendant | : |

AFFIDAVIT OF SERVICE

I, Querino R. Torretti, Esquire, Attorney for the Defendant, Cori M. Minns, being duly sworn according to law, depose and say that on the 24th day of July, 2001, I personally mailed the Copy To Be Served On District Justice of the Notice Of Appeal, No. 2001 - 01162-C.D., to District Justice Patrick N. Ford, by mailing said same, Return Receipt Requested, to 309 Maple Avenue, Box 452, DuBois, PA 15801. The same was received by him on July 26, 2001 as evidence by Postal Service Form 3811 attached hereto.

I further attest that on the 24th day of July, 2001, I personally mailed the Copy To Be Served On Appellee of the Notice Of Appeal and Rule To File Complaint, No. 2001 - 01162-C.D., to Appellee, Tabitha Rozyle by both regular mail and Certified Mail, Restricted Delivery, Return Receipt Requested, to her address of 17 South Stockdale Street, DuBois, Pa 15801. The same was received by her on August 2, 2001 as evidence by Postal Service Form 3811 attached hereto.


Querino R. Torretti, Esquire
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,

Plaintiff

vs.

CORI M. MINNS

Defendant

No. 01-1162 C.D.

Type of Pleading
Complaint

Filed on behalf of: Tabitha Rozyle

Counsel of Record:
LEA ANN HELTZEL, ESQUIRE
Attorney at Law
Supreme Court I.D. No. 83998

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

AUG 09 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,
Plaintiff

vs.

CORI M. MINNS
Defendant

:
:
:
:
:
:
:

No. 01-1162 C.D.

NOTICE

TO: DEFENDANT

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.

Office of the Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,
Plaintiff

vs.

CORI M. MINNS
Defendant

:
:
:
:
:
:
:

No. 01-1162 C.D.

COMPLAINT

AND NOW, comes Plaintiff, Tabitha Rozyle, by and through her attorneys,
Hopkins Law Firm and files the within Complaint against the Defendant as follows:

COUNT I

NEGLIGENCE

1. Plaintiff, Tabitha Rozyle, is an adult individual who currently resides at 17
South Stockdale Street, DuBois, Clearfield County, Pennsylvania.

2. Defendant, Cori M. Minns, is an adult individual who currently resides at
31 Short Street, Falls Creek, Pennsylvania.

3. On June 7, 2000, Plaintiff allowed Defendant to sit in her 1989 Chevy
Caviler and listen to the radio while Plaintiff went to graduation practice and at no time
gave the Defendant permission to drive said vehicle.

4. Defendant drove Plaintiff's vehicle to the Shop and Save parking lot
located in DuBois, Pennsylvania where she was involved in an accident. Defendant hit a
parked car with Plaintiff's vehicle.

5. Defendant owed a duty to Plaintiff to properly care for Plaintiff's vehicle which was in her possession, custody and control.

6. Defendant breached her duty to Plaintiff by negligently failing to care for Plaintiff's vehicle in that she drove Plaintiff's vehicle without her permission to the Shop and Save parking lot and was involved in a motor vehicle accident which caused damage to Plaintiff's vehicle in the amount of \$2035.31.

7. Defendant is liable to Plaintiff for the damages to Plaintiff's vehicle as aforesaid.

8. Plaintiff has incurred District Magistrate filing fees in the amount of \$56.00 for which Plaintiff is entitled to be reimbursed.

Wherefore, Plaintiff demands judgment against Defendant in the amount of \$2035.31 together with pre-judgment and post-judgment interest, costs of suit, attorney's fees and such other and further relief as the Court deems fair and equitable.

COUNT II

BAILMENT

9. Plaintiff repeats and incorporates paragraphs 1 through 8 as if set forth at length herein.

10. On or about June 7, 2000, Plaintiff and Defendant entered into an oral agreement whereby Plaintiff agreed to allow Defendant to sit in her motor vehicle and listen to the radio while Plaintiff attended graduation practice.

13. Plaintiff then left her automobile in Defendant's care, custody and control with the understanding that Defendant would not drive the motor vehicle.

14. Defendant negligently and carelessly operated Plaintiff's automobile as to cause it to be involved in a collision whereby it was damaged and required substantial repairs.

15. As a result of Defendant's failure to take care and return the Plaintiff's automobile in good condition, Plaintiff's automobile required repairs to following: front bumper; grill; head lamp; right side lamp; right fender; hood panel; head lamp mount panel; right and left front bumper cover; and stripes on hood.

16. The cost of said repairs is \$2035.31, which is the fair and reasonable cost thereof.

17. Plaintiff made demand upon the defendant for the sum of \$2035.31, being the cost of the repairs for the vehicle made necessary by Defendant's failure to care for and return the automobile in good condition, but the Defendant has refused to pay the sums demanded or any part thereof.

16. Plaintiff has incurred District Magistrate filing fees of \$56.00 for which Plaintiff is entitled to reimbursement.

WHEREFORE, Plaintiff demands judgment in her favor against Defendant in the amount of \$2035.31, together with pre-judgment and post-judgment interest, costs of suit, attorneys fees and such other and further relief as the Court deems fair and equitable.

Respectfully submitted



Lea Ann Heltzel, Esquire

VERIFICATION

I, Lea Ann Heltzel, Esquire, do hereby state that I am the attorney for the Plaintiff, Tabitha Rozyle, that I am authorized to make this Verification on behalf of the Plaintiff, and the facts set forth in the foregoing Complaint are true and correct, not at my own knowledge, but from information supplied to me from the Plaintiff, and that the purpose of this Verification is to expedite the litigation, and that the Verification of the Plaintiff, Tabitha Rozyle, will be supplied, if demanded, also, subject to the penalties of 18 Pa.C.S.A. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Lea Ann Heltzel', is written over a horizontal line.

Lea Ann Heltzel, Esquire
Attorney for Plaintiff, Tabitha Rozyle

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,

Plaintiff

vs.

CORI M. MINNS

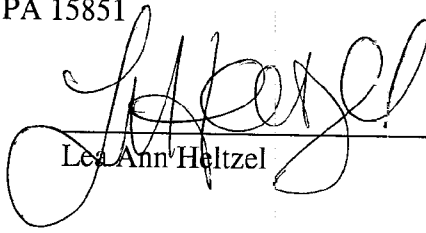
Defendant

No. 01-1162 C.D.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Complaint filed by Tabitha Rozyle, was forwarded on the 9th day of August, 2001, by U.S. Mail, postage prepaid, to Querino R. Torretti, Esquire, addressed as follows:

Querino R. Torretti, Esquire
600 East Main Street
P.O. Box 218
Reynoldsville, PA 15851


Lea Ann Heltzel

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,
Plaintiff

vs.

CORI M. MINNS
Defendant

No. 01-1162 C.D.

Type of Pleading: Praecepto Discontinue

Filed on behalf of: Tabitha Rozyle, Plaintiff

Counsel of Record for this party:

LEA ANN HELTZEL

Attorney at Law

Supreme Court No.83998

900 Beaver Drive

DuBois, Pennsylvania 15801

(814) 375-0300

FILED

FEB 01 2002

M13 22 / Cert. Atty
William A. Shaw

Prothonotary

a Copy GA
[Signature]

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

TABITHA ROZYLE,
Plaintiff

vs.

CORI M. MINNS
Defendant

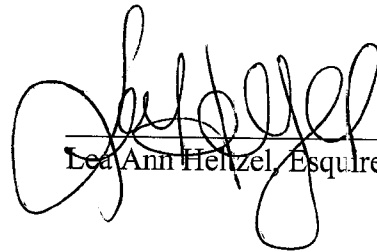
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No. 01-1162 C.D.

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above captioned civil action settled and discontinued.



Lea Ann Henzel, Esquire

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Tabitha Rozyle

Vs.
Cori M. Minns

No. 2001-01162-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 February 1, 2002 marked:

Settled and Discontinued

Record costs in the sum of \$80.00 have been paid in full by Lea Ann Heltzel, Esquire.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 1st day of February A.D. 2002.

William A. Shaw, Prothonotary

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Patrick N Ford
District Justice
309 Maple Ave
PO Box 452
Dubois PA 15801

4a. Article Number

7000 0600 0028 4732 3574

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

7-24-01

5. Received By: (Print Name)

Susan Brennan

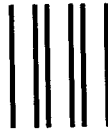
6. Signature: (Addressee or Agent)

X Susan Brennan

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Querino R. Torretti
Attorney At Law
P.O. Box 218, 600 Main St.
Reynoldsville, PA 15651

C Minns

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☒ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Tabitha Rozylo
17 South Stockdale
St.
DuBois PA 15801

4a. Article Number

7000 0600 0028 4733 3581

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

8-2-01

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X Tabitha L. Rozylo

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

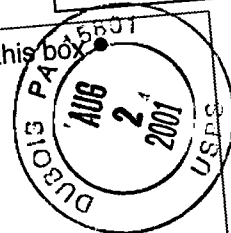
UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box

Querino R. Torretti
Attorney At Law
P.O. Box 218, 600 Main St.
Reynoldsville, PA 15851



C Minns