

01-1761-CD
FAWN L. WALLACE -vs- ALAN ADLER

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FAWN L. WALLACE,
Plaintiff
vs.

ALAN ADLER,
Defendant

CIVIL DIVISION
No. 01 - 1761 - CD

COMPLAINT
Filed on Behalf of:
Plaintiff, FAWN L. WALLACE

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED
OCT 25 2001

William A. Shaw
Prothonotary

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

FAWN L. WALLACE,

Plaintiff : No. 01 - - CD

Vs.

: JURY TRIAL DEMANDED

ALAL ADLER,

Defendant :

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money 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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

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

FAWN L. WALLACE,

Plaintiff : No. 01 - - CD

Vs.

: JURY TRIAL DEMANDED

ALAN ADLER,

Defendant :

COMPLAINT

1. Plaintiff is Fawn L. Wallace residing at Lawrence Park Village, Apartment 3-C, Clearfield, Pennsylvania 16830.

2. Defendant is Alan Adler an individual residing at 501 Sheridan Drive, Clearfield, Pennsylvania 16830.

3. On September 20, 2001, at approximately 10:14 a.m., Plaintiff was operating a 1987 Mercury Grand Marquis Sedan traveling west on SR 153 while approaching the intersection of Park Avenue in the Borough of Clearfield, Clearfield County, Pennsylvania.

4. On that same time and date, Defendant was operating a 1989 Dodge Aries K and was traveling south on South Fourth Street, a one way roadway, while approaching the intersection of Park Avenue where there was a stop sign.

5. Defendant failed to stop at the intersection of SR 153 and Park Avenue and entered the intersection of Park Avenue and 153 and

smashed into the vehicle being operated by Plaintiff violently and with great force.

6. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant in any or all of the following respects:

- a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;
- b. In failing to have the vehicle under proper control;
- c. In failing to maintain the vehicle in a proper mechanical condition;
- d. In failing to operate the brakes in such a manner so that the vehicle could be stopped in time to avoid the collision;
- e. In violating the various statutes and municipal ordinances pertaining to the operation of motor vehicles on public thoroughfares under the circumstances, including the violation of the Pennsylvania Motor Vehicle Code requiring a stop at a stop sign and to yield the right-of-way;
- f. In failing to stop at the stop sign located at the intersection of South Fourth Street and SR 153;
- g. In failing to avoid hitting the Plaintiff's vehicle when the Defendant saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant; and,

h. In failing to allow the lawful right-of-way to Plaintiff.

7. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to her bones, muscles, tissues and ligaments, shock and injury to her nerves and nervous system.

8. As a result of the injuries as aforesaid, Plaintiff has sustained the following damages:

a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for medical attention, medicines and attendant services; and,

c. Said Plaintiff's general health, strength and vitality have been impaired.

WHEREFORE, Plaintiff brings this action against Defendant to recover damages in the excess of the jurisdiction of the Board of Arbitrators of this Court and in excess of Twenty Thousand Dollars (\$20,000.00).



JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Fawn L. Wallace

FAWN L. WALLACE

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 01 - - CD

FAWN L. WALLACE, Plaintiff

vs.

ALAN ADLER, Defendant

COMPLAINT

NOTICE TO DEFENDANT:

YOU are hereby notified
that you are required to file
an Answer to the within Complaint
within twenty (20) days after
service upon you or judgment
may be entered against you.

JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

FILED

0/10/01
OCT 25 2001

William A. Shaw
Prothonotary

Atty Ad.
Atty Ad.
\$80.00

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11684

WALLACE, FAWN L.

01-1761-CD

VS.

ADLER, ALAN

COMPLAINT

SHERIFF RETURNS

**NOW OCTOBER 30, 2001 AT 9:39 AM EST SERVED THE WITHIN COMPLAINT
ON ALAN ADLER, DEFENDANT AT RESIDENCE, 501 SHERIDAN DRIVE, CLEARFIELD,
CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALAN ADLER A TRUE AND
ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE
CONTENTS THEREOF.**

SERVED BY: COUDRIET

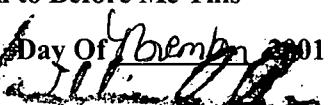
Return Costs

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

FILED

NOV 02 2001
09:30 am
William A. Shaw
Prothonotary

Sworn to Before Me This

2nd Day Of November 2001


So Answers,


Chester A. Hawkins
Sheriff

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

COPY

FAWN L. WALLACE,

Plaintiff

CIVIL DIVISION

vs.

No. 01 - 1761 - CD

ALAN ADLER,

Defendant

COMPLAINT

Filed on Behalf of:

Plaintiff, FAWN L. WALLACE

Counsel of Record for This Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

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

OCT 25 2001

Attest:

William J. Colavecchi
Prothonotary

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

FAWN L. WALLACE, :
Plaintiff : No. 01 - - CD
Vs. : JURY TRIAL DEMANDED
ALAL ADLER, :
Defendant :

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money 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.

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

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

FAWN L. WALLACE, :
Plaintiff : No. 01 - - CD
:
Vs. : JURY TRIAL DEMANDED
:
ALAN ADLER, :
Defendant :

COMPLAINT

1. Plaintiff is Fawn L. Wallace residing at Lawrence Park Village, Apartment 3-C, Clearfield, Pennsylvania 16830.

2. Defendant is Alan Adler an individual residing at 501 Sheridan Drive, Clearfield, Pennsylvania 16830.

3. On September 20, 2001, at approximately 10:14 a.m., Plaintiff was operating a 1987 Mercury Grand Marquis Sedan traveling west on SR 153 while approaching the intersection of Park Avenue in the Borough of Clearfield, Clearfield County, Pennsylvania.

4. On that same time and date, Defendant was operating a 1989 Dodge Aries K and was traveling south on South Fourth Street, a one way roadway, while approaching the intersection of Park Avenue where there was a stop sign.

5. Defendant failed to stop at the intersection of SR 153 and Park Avenue and entered the intersection of Park Avenue and 153 and

h. In failing to allow the lawful right-of-way to Plaintiff.

7. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to her bones, muscles, tissues and ligaments, shock and injury to her nerves and nervous system.

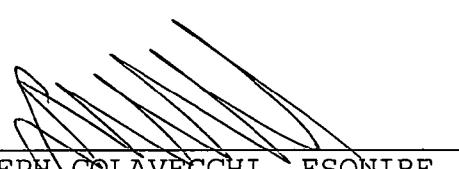
8. As a result of the injuries as aforesaid, Plaintiff has sustained the following damages:

a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for medical attention, medicines and attendant services; and,

c. Said Plaintiff's general health, strength and vitality have been impaired.

WHEREFORE, Plaintiff brings this action against Defendant to recover damages in the excess of the jurisdiction of the Board of Arbitrators of this Court and in excess of Twenty Thousand Dollars (\$20,000.00).



JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



FAWN L. WALLACE

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 01 - CD

FAWN L. WALLACE, Plaintiff

vs.

ALAN ADLER,
Defendant

COMPLAINT

NOTICE TO DEFENDANT:

YOU are hereby notified
that you are required to file
an Answer to the within Complaint
within twenty (20) days after
service upon you or judgment
may be entered against you.

JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FAWN L. WALLACE,

CIVIL DIVISION

Plaintiff,

CASE NO. 01-1761-CD

vs.

PRAECIPE FOR APPEARANCE

ALAN ADLER,

FILED ON BEHALF OF DEFENDANT:

Alan Adler

Defendant.

COUNSEL OF RECORD FOR THIS
PARTY:

MICHELLE G. MOSCHELLA, ESQUIRE
PA No. 85005

LAW OFFICE OF MARIANNE C. MNICH
TWO MELLON BANK CENTER
SUITE 405, 501 GRANT STREET
PITTSBURGH, PA 15219-4403

Telephone: 412-255-4110

FILED

NOV 08 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FAWN L. WALLACE, CIVIL DIVISION
Plaintiff, CASE NO. 01-1761-CD

vs.

ALAN ADLER,
Defendant.

PRAECIPE FOR APPEARANCE
FILED ON BEHALF OF DEFENDANT,
ALAN ADLER

TO THE PROTHONOTARY:

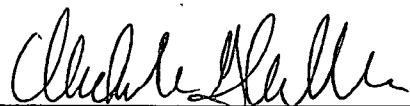
Please enter my appearance on behalf of Defendant, Alan Adler, in reference to the above captioned case.


MICHELLE G. MOSCHELLA, ESQUIRE
Attorney for Defendant
Alan Adler

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the Praecipe for Appearance upon all other parties or their attorney of record by regular First Class Mail on this 6th day of November, 2001.

Joseph Colavecchi, Esquire
COLAVECCHI, RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830



Michelle G. Moschella, Esquire

Attorney for Defendant
Alan Adler

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FAWN L. WALLACE, CIVIL DIVISION

Plaintiff,
vs.
CASE NO. 01-1761-CD

ALAN ADLER, ANSWER TO COMPLAINT
Defendant.
AND NEW MATTER

FILED ON BEHALF OF DEFENDANT:
Alan Adler

COUNSEL OF RECORD FOR THIS
PARTY:

MICHELLE G. MOSCHELLA, ESQUIRE
PA No. 85005

LAW OFFICE OF MARIANNE C. MNICH
TWO MELLON BANK CENTER
SUITE 405, 501 GRANT STREET
PITTSBURGH, PA 15219-4403

Telephone: 412-255-4110

JURY TRIAL DEMANDED

FILED

NOV 15 2001
m/12:30/m
William A. Shaw
Prothonotary

1 cent to ATF

9
KBA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FAWN L. WALLACE, CIVIL DIVISION
Plaintiff, CASE NO. 01-1761-CD

vs.

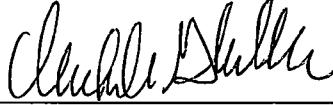
ALAN ADLER,

Defendant.

NOTICE TO PLEAD

TO: Plaintiff, Fawn L. Wallace
c/o Joseph Colavecchi, Esquire

You are notified to Plead to the enclosed Answer to
Complaint and New Matter within 20 days from the date of service
or a judgment may be entered against you.


MICHELLE G. MOSCHELLA, ESQUIRE

Attorney for Defendant
Alan Adler

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FAWN L. WALLACE, CIVIL DIVISION
Plaintiff, CASE NO. 01-1761-CD

vs.

ALAN ADLER,
Defendant.

DEFENDANT'S ANSWER TO COMPLAINT

AND NOW, comes the Defendant, Alan Adler, by and through the undersigned counsel, Michelle G. Moschella, Esquire and files the following Answer and New Matter upon a cause of action whereof the following is a statement:

1. DENIED. After reasonable investigation, this Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

2. ADMITTED.

3. DENIED. After reasonable investigation, this Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph. The allegations contained in this paragraph are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

4. DENIED. It is specifically denied that on that same time and date, the Defendant was operating a 1989 Dodge Aries K and was traveling south on South Fourth Street, a one way roadway, while approaching the intersection of Park Avenue where there was a stop sign. To the contrary, Defendant believes and

therefore avers, that he was operating a 1989 Dodge Aries K and was traveling south on South Fourth Street, a two way roadway, while approaching the intersection of Park Avenue where there was a stop sign, on September 20, 2000, at approximately 10:14 A.M.

5. DENIED. The allegations contained in this paragraph are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

6. DENIED. It is specifically denied that this Defendant was in any way negligent, reckless or careless. To the contrary, at all times material hereto, this Defendant acted reasonably and prudently and with due care. The remaining allegations contained in this paragraph are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

7. DENIED. It is specifically denied that this Defendant was in any way negligent, reckless or careless. To the contrary, at all times material hereto, this Defendant acted reasonably and prudently and with due care. The remaining allegations contained in this paragraph are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

8. DENIED. It is specifically denied that this Defendant was in any way negligent, reckless or careless. To the contrary, at all times material hereto, this Defendant acted reasonably and prudently and with due care. The remaining allegations contained

01-1761-CD
in this paragraph are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

WHEREFORE, Defendant, Alan Adler, demands of this Honorable Court Judgment in his favor and against Plaintiff, Fawn L. Wallace.

DEFENDANT'S NEW MATTER

1. All negligence causes of action and claims asserted against answering Defendant are limited, governed, barred and/or restricted, by the terms of the Pennsylvania Comparative Negligence Act, 42 Pa. C.S.A. Section 7102, the relevant terms of which are incorporated by reference herein.

2. All causes of action and claims asserted against answering Defendant are barred by the Doctrine of Assumption of the Risk, as the direct and proximate cause of any injuries/damages allegedly suffered by Plaintiff was the assumption of the risk of the Plaintiff, in knowingly subjecting himself to risk of injury/damage incurred.

3. All causes of action and claims as set forth in all Civil Complaints are limited, governed, barred, and/or restricted by the terms of the Pennsylvania Motor Vehicle Financial Responsibility Law of 1984, 75 Pa. C.S.A. 1701, et seq., as amended by Act 6 of 1990, the relevant provisions of which are incorporated by reference herein as though the same were fully set forth at length.

4. All causes of action and/or claims as set forth in all Civil Complaints are limited, governed, barred, and/or restricted

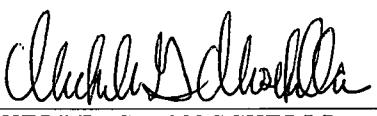
by the terms of the Pennsylvania Motor Vehicle Financial Responsibility Law of 1984, 75 Pa. C.S.A. 1701, et seq., as amended by Act 6 of 1990, the relevant provisions of which are incorporated by reference herein as though the same were fully set forth at length, including but not limited to the "limited tort" provisions of Section 1705, and in accordance with the "tort option" chosen and/or elected in the policy of insurance purportedly providing coverage for the accident in question.

5. The Civil Complaints of the Plaintiff fail to set forth a cause of action upon which relief can be granted.

6. The claims of Plaintiff is limited or barred by the statutory defense of the immunity under 77 PA C.S.A. Section 72 and other applicable provisions of the Pennsylvania Worker's Compensation Act.

WHEREFORE, Defendant, Alan Adler, demands of this Honorable Court Judgment in his favor and against Plaintiff, Fawn L. Wallace.

JURY TRIAL DEMANDED


MICHELLE G. MOSCHELLA, ESQUIRE
Attorney for Defendant
Alan Adler

VERIFICATION

MICHELLE G. MOSCHELLA, ESQUIRE, states that she is the attorney for the within named Defendant, Alan Adler, and the facts set forth in the foregoing pleading are true and correct to the best of her knowledge, information, and belief; and this statement is made subject to the penalties of 18 Pa. C. §4904, relating to unsworn falsification to authorities.



MICHELLE G. MOSCHELLA, ESQUIRE
Attorney for Defendant
Alan Adler

V E R I F I C A T I O N

Alan Adler states that he is the Defendant named herein and that the facts set forth in the Defendant's Answer to Complaint and New Matter are true and correct to the best of his knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C. S. 4904 relating to unsworn falsification to authorities.

Nov. 8, 2001

Date

Alan Adler

Alan Adler

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of DEFENDANT'S ANSWER TO COMPLAINT AND NEW MATTER upon all other parties or their attorney of record by First Class Mail on this 13th day of November, 2001.

Joseph Colavecchi, Esquire
COLAVECCHI, RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830


MICHELLE G. MOSCHELLA, ESQUIRE
Attorney for Defendant
Alan Adler

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FAWN L. WALLACE,

Plaintiff

vs.

ALAN ADLER,

Defendant

CIVIL DIVISION

No. 01 - 1761 - CD

REPLY TO NEW MATTER

Filed on Behalf of:

Plaintiff, FAWN L. WALLACE

Counsel of Record for This Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #05810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED

NOV 21 2001
m/12:50pm
William A. Shaw
Prothonotary

No C/C E/S

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

FAWN L. WALLACE,

Plaintiff : No. 01 - 1761 - CD

Vs.

ALAN ADLER,

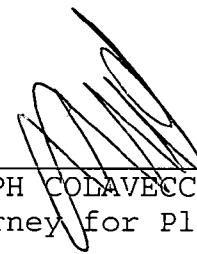
Defendant :

REPLY TO NEW MATTER

NOW COMES, Fawn L. Wallace, who, through her attorney, Joseph Colavecchi, Esquire, files her Reply to the New Matter of the Defendant and respectfully avers as follows:

1. This is a statement of the law and does not require a reply.
2. This is a statement of the law and does not require a reply.
3. This is a statement of the law and does not require a reply.
4. This is a statement of the law and does not require a reply.
5. Denied for the reasons as set forth in the Complaint.
6. This is a statement of the law and does not require a reply.

WHEREFORE, Plaintiff, Fawn L. Wallace, asks that the Answer and New Matter of the Defendant be dismissed and that judgment be entered for her, together with interest and costs.


JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I verify that the statements made in this Reply to New Matter are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Fawn L. Wallace

FAWN L. WALLACE

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.

CIVIL DIVISION
No. 01 - 1761 - CD

FAWN L. WALLACE, Plaintiff

ALAN ADLER, Defendant

vs.

REPLY TO NEW MATTER

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

IN THE MATTER OF:

COURT OF COMMON PLEAS

WALLACE

TERM, 2001

-VS-

CASE NO: 01-1761

ADLER

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

MCS on behalf of MICHELLE MOSCHELLA, ESQUIRE
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: 12/26/2001

MICHELLE MOSCHELLA, ESQUIRE
Attorney for DEFENDANT

FILED

DEC 24 2001

m110521ncc
William A. Shaw
Prothonotary

DE11-006464 79280-L01

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

IN THE MATTER OF:

COURT OF COMMON PLEAS

WALLACE

TERM, 2001

-VS-

CASE NO: 01-1761

ADLER

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: JOSEPH COLAVECCHI, ESQUIRE

MCS on behalf of MICHELLE MOSCHELLA, ESQUIRE 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: 12/05/2001

MCS on behalf of

MICHELLE MOSCHELLA, ESQUIRE
Attorney for DEFENDANT

CC: MICHELLE MOSCHELLA, ESQUIRE -
STEVEN SHISLER -
-
-
-

Any questions regarding this matter, contact

THE MCS GROUP, INC.
300 LAWYERS BUILDING

PITTSBURGH, PA 15219
(412) 642-4420

RECORDS REQUESTED	LOCATION NAME
MEDICAL AND X-RAY(S)	CLEARFIELD HOSPITAL
MEDICAL RECORDS & XRAYS	R.S. POLINTAN, M.D.
MEDICAL RECORDS & XRAYS	MARK PLASIO, M.D.
MEDICAL RECORDS & XRAYS	THERAPY WORKS
INSURANCE	STATE FARM INSURANCE COMPANY
MEDICAL RECORDS & XRAYS	CLEARFIELD PROFESSIONAL GROUP
MEDICAL RECORDS & XRAYS	CLEARFIELD ADULT MEDICINE
EMPLOYMENT	CLEARFIELD AREA SCHOOL DIST.
Employment	American Legion

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace
Plaintiff(s)

Vs.

Alan Adler
Defendant(s)

*

*

No. 2001-01761-CD

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

TO: Custodian of Records: Clearfield 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 Rider *****

300 Lawyers Building Pittsburgh, Pa 15219

(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: Michelle Moschella, Esquire
ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219
TELEPHONE: (412) 642-4420
SUPREME COURT ID #
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy *(initials)*

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

DATE: Monday, December 03, 2001
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CLEARFIELD HOSPITAL
809 TURNPIKE AVENUE**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, relating to any examination, consultation, care or treatment of patient.

CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Fawn L. Wallace

*

Plaintiff(s)

vs.

*

No. 2001-01761-CD

Alan Adler

*

Defendant(s)

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

TO: Custodian of Records: Dr. Politan
(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: 300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire

ADDRESS: 405 Two Mellon Bank Center

Pittsburgh, Pa 15219

TELEPHONE: (412) 642-4420

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, December 03, 2001

Seal of the Court

William Johnson
Deputy City

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**R.S. POLINTAN, M.D.
807 TURNPIKE AVENUE
SUITE 120**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, billing and payment records, relating to any examination, consultation, care or treatment. *****TO INCLUDE PATIENT ID SHEET****
CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace

*

Plaintiff(s)

*

Vs.

No. 2001-01761-CD

Alan Adler

*

Defendant(s)

*

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

TO: Custodian of Records: Dr. Piasio
(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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire
ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219
TELEPHONE: (412) 642-4420
SUPREME COURT ID# 442-4420
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy
Clerk

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

MARK PIASIO, M.D.
90 BEAVER DRIVE

CLEARFIELD, PA 16830

RE: 79280
FAWN L. WALLACE

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, billing and payment records, relating to any examination, consultation, care or treatment. ***TO INCLUDE PATIENT ID SHEET**
CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace

*

Plaintiff(s)

Vs.

*

No. 2001-01761-CD

Alan Adler

*

Defendant(s)

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

TO: Custodian of Records: Therapy Works

(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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire

ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219

TELEPHONE:

412-227-4420

SUPREME COURT ID# 41271942-4420

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division


Deputy *cm*

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**THERAPY WORKS
RT. 879**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, billing and payment records, relating to any examination, consultation, care or treatment. *TO INCLUDE PATIENT ID SHEET**
*CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED***

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Fawn L. Wallace
Plaintiff(s)

VS. * No. 2001-01761-CD
* *

Alan Adler
Defendant(s)

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

TO: Custodian of Records: State Farm
(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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire

ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219

TELEPHONE: (412) 642-4420

SUPREME COURT ID #

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, December 03, 2001

Seal of the Court

William L. Brown
Deputy City

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**STATE FARM INSURANCE COMPANY
650 CERRINGTON PARKWAY**

CORAOPOLIS, PA 15108

**RE: 79280
FAWN L. WALLACE**

Any and all insurance records.

CERTIFICATION MUST BE SIGNED AND RETURNED WITH RECORDS

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

Date of Loss: 09/20/2000

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Fawn L. Wallace
Plaintiff(s)

vs.

*

No. 2001-01761-CD

Alan Adler
Defendant(

*

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

TO: Custodian of Records: Clearfield Professional 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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire

ADDRESS: 405 Two Mellon Bank Center
Pittsburgh Pa 15219

TELEPHONE: (412) 613-1130

~~TELEPHONE: (412) 97 4420~~
SUPREME COURT ID #

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, December 03, 2001
Seal of the Court

William Johnson
Democrat

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CLEARFIELD PROFESSIONAL GROUP
820 TURNPIKE AVENUE**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, billing and payment records, relating to any examination, consultation, care or treatment. *****TO INCLUDE PATIENT ID SHEET****
CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace

Plaintiff(s)

Vs.

*

No. 2001-01761-CD

Alan Adler

Defendant(s)

*

*

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

TO: Custodian of Records: Clearfield Adult Medicine
(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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire

ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219

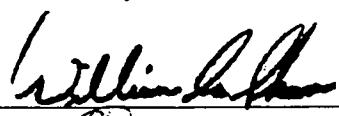
TELEPHONE: (412) 642-4420

SUPREME COURT ID #

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy (cm)

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

DATE: Monday, December 03, 2001

Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CLEARFIELD ADULT MEDICINE
500 TURNPIKE AVENUE**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all records, correspondence, files and memorandums, handwritten notes, original X-Rays, billing and payment records, relating to any examination, consultation, care or treatment. *****TO INCLUDE PATIENT ID SHEET*****
CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace

Plaintiff(s)

Vs.

*

No. 2001-01761-CD

Alan Adler

Defendant(s)

*

*

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

TO: Custodian of Records: Clearfield Area School District
(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:

300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****
(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: Michelle Moschella, Esquire
ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219
TELEPHONE: (412) 642-4420
SUPREME COURT ID #
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy (E)

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

DATE: Monday, December 03, 2001
Seal of the Court

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**CLEARFIELD AREA SCHOOL DIST.
438 RIVER ROAD**

CLEARFIELD, PA 16830

**RE: 79280
FAWN L. WALLACE**

Any and all employment records, files and memorandums, compensation, time and attendance records, personnel records, payroll and salary reports and all medical records as an employee.

CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Fawn L. Wallace
Plaintiff(s)

Vs.

*

No. 2001-01761-CD

Alan Adler
Defendant(s)

*

*

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

TO: Custodian of Records: American Legion
(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:
300 Lawyers Building Pittsburgh, Pa 15219 *****See Attached Rider *****

(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: Michelle Moschella, Esquire
ADDRESS: 405 Two Mellon Bank Center
Pittsburgh, Pa 15219
TELEPHONE: (412) 642-4420
SUPREME COURT ID #
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Monday, December 03, 2001
Seal of the Court


Deputy 

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

EXPLANATION OF REQUIRED RECORDS

TO: CUSTODIAN OF RECORDS FOR:

**AMERICAN LEGION
419 MAXWELL STREET**

CURWENSVILLE, PA 16833

**RE: 79280
FAWN L. WALLACE**

Any and all employment records, files and memorandums, compensation, time and attendance records, personnel records, payroll and salary reports and all medical records as an employee.

CERTIFICATION OF RECORDS MUST BE SIGNED AND RETURNED

Dates Requested: up to and including the present.

Subject : FAWN L. WALLACE

LAWRENCE PARK VILLAGE, CLEARFIELD, PA 16830

Social Security #: 160-60-7016

Date of Birth: 06-22-1964

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FAWN L. WALLACE,

Plaintiff

vs.

ALAN ADLER,

Defendant

CIVIL DIVISION

No. 01 - 1761 - CD

PRAECIPE TO DISCONTINUE

Filed on Behalf of:

Plaintiff, FAWN L. WALLACE

Counsel of Record for This Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

FILED

APR 01 2003

**William A. Shaw
Prothonotary**

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 01 - 1761 - CD

FAWN L. WALLACE, Plaintiff
vs.

ALAN ADLER, Defendant

PLAECIPE TO DISCONTINUE

FILED

APR 01 2003
0/3:30/04 NO CC
Clerk of Court to or
William A. Shaw Clerk of
Prothonotary

COLAVECCHI
RYAN & COLAVECCHI
ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Fawn L. Wallace

Vs. No. 2001-01761-CD
Alan Adler

CERTIFICATE OF DISCONTINUATION

COPY

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on April 01, 2003, marked:

Settled, Discontinued and Ended

Record costs in the sum of \$\$110.34 have been paid in full by Attorney Joseph Colavecchi.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 2nd day of April A.D. 2003.



William A. Shaw, Prothonotary