

01-196T-CD
DEBI MUMFORD -vs- KAREN L. STOTTISH

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-CD

Type of pleading

COMPLAINT

Filed on behalf of:

PLAINTIFF

Counsel of record for
this party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

JURY TRIAL DEMANDED

FILED

DEC 05 2001

William A. Shaw
Prothonotary

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

No. 01-1961-CO

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 defense or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without further notice for any money claimed 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 Floor
Clearfield, PA 16830
(814) 765-2641, Ext 1303

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

No. 01-1961-CO

COMPLAINT

AND NOW, comes the Plaintiff, Debi Mumford, and hereby brings the within action against the Defendant, Karen L. Stottish, averring as follows:

1. The Plaintiff is Debi Mumford, an adult individual, who resides at 166 Third Street, Falls Creek, Jefferson County, Pennsylvania.

2. The Defendant is Karen L. Stottish, an individual, residing at 318 Osburn Avenue, Falls Creek, Jefferson County, Pennsylvania.

3. On or about January 14, 2000, at or about 1:30 p.m. EST, one James B. Schubert was the owner of a certain 1994 Chevrolet Van and was operating the same in a northerly direction on route S.R. 255 in the City of DuBois, Clearfield County, Pennsylvania.

4. Plaintiff, Debi Mumford, was a passenger in said vehicle being operated by James B. Schubert.

5. On said date and time, Karen L. Stottish was operating a 1998 Ford Expedition owned by Defendant, Karen L. Stottish, and Gerald H. Stottish, also in a northerly direction on route S.R. 255 in the City of DuBois, Clearfield County, Pennsylvania.

6. When said vehicle being operated by James B. Schubert arrived at a crosswalk located on S.R. 255, approximately 100 feet West from the intersection of S.R. 255 and Sixth Street, the said James B. Schubert brought the vehicle to a stop to permit pedestrians to cross the street at a crosswalk located at said location.

7. Said vehicle being operated by James B. Schubert was violently struck in the rear by the motor vehicle operated by the Defendant, Karen L. Stottish, causing the injuries and damages hereinafter set forth.

8. The aforesaid collision was directly and proximately caused by the negligence and carelessness of the Defendant, Karen L. Stottish, which consisted among other things of the following:

- (a) Operating her said motor vehicle in a careless, reckless, and negligent manner;

- (b) Operating said motor vehicle at an excessive rate of speed under the circumstances;

- (c) Not having said motor vehicle under proper control so as to stop said vehicle within an assured clear distance (75 Pa. Cons. Stat. §3361);

- (d) Operating said vehicle without due regard to the rights, safety and position of the Plaintiff;

- (e) Failure to have said motor vehicle under the proper control so as to prevent this accident from striking the motor vehicle in which this Plaintiff was a passenger;

- (f) Failing to keep a proper lookout;

- (g) Failure to use due care under the circumstances;

- (h) Failing to notice the stopped motor vehicle being operated by James B. Schubert;

(i) Failing to take evasive action in order to avoid impacting with the vehicle in which the Plaintiff was a passenger;

(j) Failing to apply her brakes in sufficient time to avoid striking the vehicle in which the Plaintiff was a passenger; and

(k) Operating said motor vehicle in disregard of the rules of the road, the ordinances of the City of DuBois, and the laws of the Commonwealth of Pennsylvania, including but not limited to the Motor Vehicle Code, 75 Pa. Cons. Stat. §3361 and 3362.

9. As a direct and proximate result of the negligence of the Defendant, Karen L. Stottish, as above set forth, Plaintiff, Debi Mumford, has sustained the injuries and damages as follows:

(a) Severe strain and sprain of the ligaments of the cervical spine;

(b) Severe sprain and shock to the muscles, nerves, bones and joints of her body;

(c) Muscle spasms of the cervical spine;

(d) Significant weakness in the left forearm region;

(e) Decreased left hand grasp strength;

(f) Tenderness of the cervical region as well as the lumbar paraspinal regions;

(g) Left forearm swelling with diffused tenderness in the left forearm;

(h) Severe bruise of the tailbone of the Plaintiff;

(i) Pain and suffering;

(j) Loss of earning capacity and ability;

(k) Loss of earnings in the future;

(l) Loss of earnings from the date of the accident to the present;

(m) Humiliation; and

(n) Loss of life's pleasures.

10. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, has suffered great bodily pain and suffering, as well as mental anxiety and nervousness to her great detriment and loss.

11. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, as suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

12. At the time of the subject accident on January 14, 2000, Debi Mumford was pregnant, and as a consequence the x-ray of her tailbone was not possible. Consequently, said child had to be delivered by cesarean section instead of a natural birth. As a result of said surgical procedure, the Plaintiff, Debi Mumford, suffered pain and suffering and inconvenience which would not have been attendant to a natural birth.

13. The damages suffered by the Plaintiff, Debi Mumford, as a result of the subject accident are in excess of the sum of \$25,000.00.

WHEREFORE, Plaintiff demands judgment in her favor against the Defendant in an amount in excess of the arbitration limit of this Court.

A JURY TRIAL IS DEMANDED.

A handwritten signature in black ink, appearing to read 'Anthony S. Guido', is written over a horizontal line.

Anthony S. Guido
Attorney for Plaintiff

VERIFICATION

I, DEBI MUMFORD, do hereby verify that I have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date: 11.23.01

Debi Mumford
Debi Mumford

FILED

DEC 05 2001 atty pd 80⁰⁰

m/10:28 a.m.

William A. Shaw

Prothonotary

100

1 cc to atty.

2 cc to sheriff

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
**AMENDED PRAECIPE FOR
ENTRY OF APPEARANCE**

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

JAN 07 2002
m/l:15/noccl *WAS*
William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

AMENDED PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, KAREN L. STOTTISH, in the
above-captioned matter.

We are authorized to accept service on her behalf.

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: January 3, 2002

By: 

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant

811 University Drive

State College, PA 16801

(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

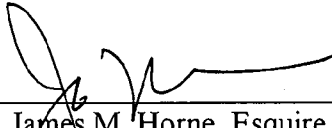
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Amended Praecipe for Entry of Appearance on behalf the Defendant, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 4th day of January, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11831

MUMFORD, DEBI

01-1961-CD

VS.

STOTTISH, KAREN L.

COMPLAINT

SHERIFF RETURNS

NOW DECEMBER 6, 2001, THOMAS DEMKO, SHERIFF OF JEFFERSON COUNTY
WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY
TO SERVE THE WITHIN COMPLAINT ON KAREN L. STOTTISH, DEFENDANT.

NOW DECEMBER 31, 2001 SERVED THE WITHIN COMPLAINT ON KAREN STOTTISH,
DEFENDANT BY DEPUTIZING THE SHERIFF OF JEFFERSON COUNTY. THE
RETURN OF SHERIFF DEMKO IS HERETO ATTACHED AND MADE A PART OF THIS
RETURN STATING THAT HE SERVED GERALD STOTTISH, FATHER.

Return Costs

Cost	Description
27.89	SHFF. HAWKINS PAID BY: ATTY.
47.28	SHFF. DEMKO PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.
<u>85.17</u>	

FILED

012:15
JAN 16 2002

William A. Shaw
Prothonotary

Sworn to Before Me This

16 Day Of Jan 2002
William A. Shaw

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

So Answers,

Chester A. Hawkins
by Marilyn Hamer
Chester A. Hawkins
Sheriff

No. 01-1961-C.D.

Personally appeared before me, Dale W. Overman, Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on December 31, 2001 at 4:09 o'clock P.M. served the Notice and Complaint upon KAREN L. STOTTISH, Defendant, at her residence, 318 Osburn Avenue, Borough of Falls Creek, County of Jefferson, State of Pennsylvania by handing to Gerald Stottish, her father and adult person with whom she resides, a true copy of the Notice and Complaint, and by making known to him the contents thereof.

Advance Costs Received:	\$125.00
My Costs:	\$ 45.28 Paid
Prothy:	\$ 2.00
Total Costs:	\$ 47.28
Refunded:	\$ 77.72

Sworn and subscribed

to the effect of this

day of

By

January 19, 2002
Theresa Stottish

So Answers,

Dale W. Overman
Deputy
Thomas A. Demko
JEFFERSON COUNTY, PENNSYLVANIA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

COPY

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-CD

Type of pleading

COMPLAINT

Filed on behalf of:

PLAINTIFF

Counsel of record for
this party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

JURY TRIAL DEMANDED

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

DEC 05 2001

Attest:


Prothonotary

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

No. 01-1961-CD

NOTICE

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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 Floor
Clearfield, PA 16830
(814) 765-2641, Ext 1303

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

No. 01-1961-CD

COMPLAINT

AND NOW, comes the Plaintiff, Debi Mumford, and hereby brings the within action against the Defendant, Karen L. Stottish, averring as follows:

1. The Plaintiff is Debi Mumford, an adult individual, who resides at 166 Third Street, Falls Creek, Jefferson County, Pennsylvania.

2. The Defendant is Karen L. Stottish, an individual, residing at 318 Osburn Avenue, Falls Creek, Jefferson County, Pennsylvania.

3. On or about January 14, 2000, at or about 1:30 p.m. EST, one James B. Schubert was the owner of a certain 1994 Chevrolet Van and was operating the same in a northerly direction on route S.R. 255 in the City of DuBois, Clearfield County, Pennsylvania.

4. Plaintiff, Debi Mumford, was a passenger in said vehicle being operated by James B. Schubert.

5. On said date and time, Karen L. Stottish was operating a 1998 Ford Expedition owned by Defendant, Karen L. Stottish, and Gerald H. Stottish, also in a northerly direction on route S.R. 255 in the City of DuBois, Clearfield County, Pennsylvania.

6. When said vehicle being operated by James B. Schubert arrived at a crosswalk located on S.R. 255, approximately 100 feet West from the intersection of S.R. 255 and Sixth Street, the said James B. Schubert brought the vehicle to a stop to permit pedestrians to cross the street at a crosswalk located at said location.

7. Said vehicle being operated by James B. Schubert was violently struck in the rear by the motor vehicle operated by the Defendant, Karen L. Stottish, causing the injuries and damages hereinafter set forth.

8. The aforesaid collision was directly and proximately caused by the negligence and carelessness of the Defendant, Karen L. Stottish, which consisted among other things of the following:

(a) Operating her said motor vehicle in a careless, reckless, and negligent manner;

(b) Operating said motor vehicle at an excessive rate of speed under the circumstances;

(c) Not having said motor vehicle under proper control so as to stop said vehicle within an assured clear distance (75 Pa. Cons. Stat. §3361);

(d) Operating said vehicle without due regard to the rights, safety and position of the Plaintiff;

(e) Failure to have said motor vehicle under the proper control so as to prevent this accident from striking the motor vehicle in which this Plaintiff was a passenger;

(f) Failing to keep a proper lookout;

(g) Failure to use due care under the circumstances;

(h) Failing to notice the stopped motor vehicle being operated by James B. Schubert;

(i) Failing to take evasive action in order to avoid impacting with the vehicle in which the Plaintiff was a passenger;

(j) Failing to apply her brakes in sufficient time to avoid striking the vehicle in which the Plaintiff was a passenger; and

(k) Operating said motor vehicle in disregard of the rules of the road, the ordinances of the City of DuBois, and the laws of the Commonwealth of Pennsylvania, including but not limited to the Motor Vehicle Code, 75 Pa. Cons. Stat. §3361 and 3362.

9. As a direct and proximate result of the negligence of the Defendant, Karen L. Stottish, as above set forth, Plaintiff, Debi Mumford, has sustained the injuries and damages as follows:

(a) Severe strain and sprain of the ligaments of the cervical spine;

(b) Severe sprain and shock to the muscles, nerves, bones and joints of her body;

(c) Muscle spasms of the cervical spine;

(d) Significant weakness in the left forearm region;

(e) Decreased left hand grasp strength;

(f) Tenderness of the cervical region as well as the lumbar paraspinal regions;

(g) Left forearm swelling with diffused tenderness in the left forearm;

(h) Severe bruise of the tailbone of the Plaintiff;

(i) Pain and suffering;

(j) Loss of earning capacity and ability;

(k) Loss of earnings in the future;

(l) Loss of earnings from the date of the accident to the present;

(m) Humiliation; and

(n) Loss of life's pleasures.

10. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, has suffered great bodily pain and suffering, as well as mental anxiety and nervousness to her great detriment and loss.

11. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, as suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

12. At the time of the subject accident on January 14, 2000, Debi Mumford was pregnant, and as a consequence the x-ray of her tailbone was not possible. Consequently, said child had to be delivered by cesarean section instead of a natural birth. As a result of said surgical procedure, the Plaintiff, Debi Mumford, suffered pain and suffering and inconvenience which would not have been attendant to a natural birth.

13. The damages suffered by the Plaintiff, Debi Mumford, as a result of the subject accident are in excess of the sum of \$25,000.00.

WHEREFORE, Plaintiff demands judgment in her favor against the Defendant in an amount in excess of the arbitration limit of this Court.

A JURY TRIAL IS DEMANDED.



Anthony S. Guido
Attorney for Plaintiff

VERIFICATION

I, DEBI MUMFORD, do hereby verify that I have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date: 11.23.01

Debi Mumford
Debi Mumford

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

JAN 25 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas to Produce Documents and Things directed to: DuBois Regional Medical Center, Liberty Medical Associates, P&G Therapy, Inc., Keystone Rehabilitation Systems, Alexander A. Krot, D.O., Stanley Lang, M.D./Agape Family Health Center, Geisinger Medical Group, and Adolfo Rapaport, D.O. in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 24th day of January, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant

811 University Drive

State College, PA 16801

(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
CERTIFICATES OF SERVICE

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

JAN 25 2002

BE
W
William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Interrogatories Propounded by Defendant Stottish for Answer By Plaintiff (Set One) and Request for Production (Set One) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 24th day of January, 2002, to the attorneys/parties of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

FILED

JAN 25 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Stottish's Second Request For Production of Documents and Tangible Things By Defendant Directed to Plaintiff in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 21st day of January, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

FILED

JAN 25 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

: No. 01-1961-C.D.

: TYPE OF PLEADING:

: **ANSWER WITH NEW MATTER**

: TYPE OF CASE: CIVIL

: FILED ON BEHALF OF:

: **DEFENDANT**

: COUNSEL OF RECORD FOR

: FOR THIS PARTY:

: JAMES M. HORNE, ESQ.

: I.D. NO. 26908

: KATHERINE V. OLIVER, ESQ.

: I.D. NO. 77069

: McQUAIDE, BLASKO, SCHWARTZ,

: FLEMING & FAULKNER, INC.

: 811 University Drive

: State College, PA 16801

: PH# (814) 238-4926

: FAX#(814) 238-9624

FILED

.IAN 30 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

NOTICE TO PLEAD

TO: Debi Mumford
% Anthony S. Guido, Esquire

YOU ARE HEREBY notified to plead to the within New Matter within twenty (20) days
from the date of service hereof or a default judgment may be entered against you.

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: January 29, 2002

By: 

James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

ANSWER WITH NEW MATTER OF DEFENDANT, KAREN L. STOTTISH

AND NOW, comes Defendant, Karen L. Stottish, by and through her undersigned counsel, McQuaide, Blasko, Schwartz, Fleming & Faulkner, Inc., and files the within Answer with New Matter, and in support thereof, avers as follows:

1. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1. The same are therefore denied and strict proof thereof demanded.
2. Admitted.
3. Admitted in part and denied in part. It is admitted that on or about January 14, 2000 at approximately 1:30 p.m., one James Schubert was operating a van in a northerly direction on Route 255 in DuBois. As to the allegation concerning ownership of the van, after reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of that allegation. The same is therefore denied and strict proof thereof demanded.
4. Upon information and belief, the allegations of paragraph 4 are admitted.
5. Admitted.

6. It is admitted only that James Schubert stopped his vehicle in the northbound lane of State Route 255 in the City of DuBois at or about the place alleged. As to the balance of the allegations of paragraph 6, after reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of those allegations. The same are therefore denied and strict proof thereof demanded.

7. It is admitted only that the front of the vehicle operated by Defendant came into minor contact with the rear of the vehicle operated by Mr. Schubert. It is specifically denied that the collision was violent or that said collision caused injuries or damages as alleged by Plaintiff. Pursuant to Pa. Rule of Civil Procedure 1029(e), all such allegations are denied and strict proof thereof demanded.

8. (a) - (k). The allegations of paragraphs 8(a) through 8(k) are denied pursuant to Pa. Rule of Civil Procedure 1029(e).

9. - 13. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 9 through 13, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Karen L. Stottish requests that the Complaint of Plaintiff Debi Mumford be dismissed, with prejudice and costs of suit.

NEW MATTER

14. Defendant hereby asserts and raises all those defenses and/or limitations on damages available to her by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

15. To the extent Plaintiff's medical expenses, if any, have been paid or are payable

under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

16. To the extent Plaintiff's lost wages, if any, have been paid or are payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

17. To the extent Plaintiff was insured under a policy of insurance bearing the limited tort option, Plaintiff's claims are barred or reduced accordingly.

18. Plaintiff's injuries and damages, if any, are caused in whole or in part by virtue of other pre-existing conditions and/or other accidents, which are in no way the responsibility of the Defendant herein.

WHEREFORE, Defendant Karen L. Stottish requests that the Complaint of Plaintiff Debi Mumford be dismissed, with prejudice and costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: January 29, 2002

By: 

James M. Horne, Esquire
U. D. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

VERIFICATION

The undersigned verifies that she is authorized to make this Verification on her own behalf, and that the statements made in the foregoing Answer with New Matter of Defendant, are true and correct to the best of her knowledge, information and belief. The undersigned understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.


KAREN L. STOTTISH

Dated: 1/27/02, 2002

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

DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

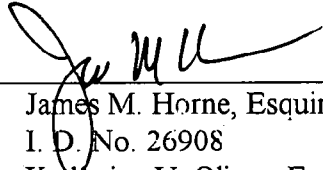
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answer with New Matter to Plaintiff's Complaint in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 29th day of January, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

: No. 01-1961-C.D.

:
: TYPE OF PLEADING:
: **Certificate Prerequisite to Service**
: **of Subpoenas**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

FEB 01 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve the subpoena with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) via letter dated January 28, 2002, Plaintiff's counsel has waived the 20-day objection period, and,
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: January 31, 2002

By: 

James M. Horne, Esquire
I.D. No. 26908
Attorneys for Defendant
841 University Drive
State College, PA 16801-6699
(814) 238-4926

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

DEBI MUMFORD,

No. 01-1961-C.D.

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant intends to serve subpoenas identical to those 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 subpoenas. If no objection is made, the subpoenas may be served.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: January 21, 2002

By: _____

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *DuBois Regional Medical Center*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *Liberty Medical Associates*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *P&G Physical Therapy, Inc.*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COPY

No. 01-1961-C.D.

Defendant.

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
 :
 :
 :
KAREN L. STOTTISH, :
Defendant. :
 :

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

TO: *Alexander A. Krot, D.O.*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *Geisinger Medical Group*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DEBI MUMFORD,
Plaintiff,

No. 01-1961-C.D.

KAREN L. STOTTISH,
Defendant.

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

TO: *Adolfo Rapaport, D.O., FACOOG*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoenas to Produce Documents and Things directed to: DuBois Regional Medical Center, Liberty Medical Associates, P&G Therapy, Inc., Keystone Rehabilitation Systems, Alexander A. Krot, D.O., Stanley Lang, M.D./Agape Family Health Center, Geisinger Medical Group, and Adolfo Rapaport, D.O. in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 31st day of January, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-C.D.

Type of pleading

REPLY TO NEW MATTER

Filed on behalf of:

PLAINTIFF

Counsel of record for
this party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

FILED

MAR 13 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,	:	
Plaintiff	:	
	:	
vs.	:	No. 01-1961-C.D.
	:	
KAREN L. STOTTISH,	:	
Defendant	:	

REPLY TO NEW MATTER

AND NOW, comes the Plaintiff, Debi Mumford, and by her Attorney, Anthony S. Guido, files this Reply to the New Matter filed by the Defendant in the above entitled matter as follows:

14. Denied. The allegations contained in Paragraph 14 of the New Matter are conclusions of law and not averments of fact. Therefore, no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

15. Denied. The allegations contained in Paragraph 15 of the New Matter are conclusions of law and not averments of fact. Therefore, no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

16. Denied. The allegations contained in Paragraph 16 of the New Matter are conclusions of law and not averments of fact. Therefore, no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

17. Denied. The insurance policy under which the Plaintiff was insured for motor vehicle liability purposes does not

contain a limited tort option. Therefore, Plaintiff's claim is not barred or reduced accordingly.

18. Denied. Plaintiff's damages were caused in whole or in part by virtue of the accident which is the subject of this litigation, or in the alternative were aggravated as a result of the subject accident. In either event, the Defendant is responsible to the Plaintiff for the injuries and damages which she sustained as a result of the subject accident.

WHEREFORE, Plaintiff requests that judgment be entered in her favor as set forth in the Plaintiff's Complaint.

A handwritten signature in black ink, appearing to read "A. S. Guido", is positioned above a horizontal line.

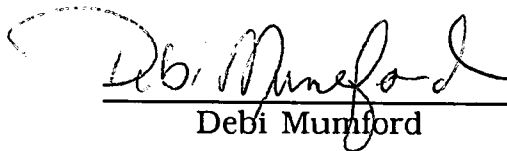
Anthony S. Guido
Attorney for Plaintiff

VERIFICATION

I, DEBI MUMFORD, do hereby verify that I have read the foregoing REPLY TO NEW MATTER. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date: 3/10/02


Debi Mumford

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2002, I mailed the
REPLY TO NEW MATTER by first class mail, postage prepaid, to the
following:

James M. Horne, Esq.
McQuaide, Blasko, Schwartz,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801



Anthony S. Guido
Attorney for Plaintiff

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
Certificate of Service


TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 01 2002

m/1:45/ly
William A. Shaw
Prothonotary

wo C/c 

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Deposition of Plaintiff in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 28th day of March, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
Certificate of Service

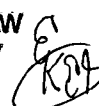
TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 04 2002

m/11:42/12000
William A. Shaw
Prothonotary



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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Rescheduled Deposition of Plaintiff in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 3rd day of April, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
CERTIFICATE OF SERVICE

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

MAY 31 2002

01243/noc
William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

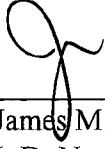
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas to Produce Documents and Things directed to: Swan & Shong (Barbara E. Swan, M.D.), Center for Orthopedics & Sports Medicine (Douglas S. Fugate, M.D.), State Farm Insurance Companies, and Nationwide Insurance Companies, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 30th day of May, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

: No. 01-1961-C.D.
:
: TYPE OF PLEADING:
: **Prerequisite to Service of Subpoenas**
: **w/Certificate of Service**
:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**
:
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

JUN 18 2002

m/jl/22/noc
William A. Shaw
Prothonotary

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

DEBI MUMFORD, : No. 01-1961-C.D.
:
Plaintiff, :
:
v. :
:
KAREN L. STOTTISH, :
:
Defendant. :


CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for documents and things pursuant to Rule 4009.22, Defendant 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) per correspondence dated June 6, 2002, Plaintiff's counsel has waived the 20-day objection period; and,
- 4) the subpoena which will be served is identical to the subpoena which are attached to the notice of intent to serve the subpoena.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: June 14, 2002

By: 
James M. Horne, Esquire
I.D. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

**NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant intends to serve subpoenas identical to those 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 subpoenas. If no objection is made, the subpoenas may be served.

MCQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Date: May 30, 2002

By: _____

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *Barbara E. Swan, M.D.*
Swan & Shong

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS# 115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____, 2002



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *Douglas S. Fugate, M.D.*
Center for Orthopedics & Sports Medicine

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Debi Mumford, SS# 115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____, 2002



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *State Farm Insurance Companies*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records in your possession pertaining to Claim #s 38-1633-210 (d/o/l 12/97), 38-J285-892 (d/o/l 8/21/99), 38-J328-230 (d/o/l 11/23/99) and 38-J480-713 (d/o/l 1/14/00) and Debi Mumford, SS# 115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____, 2002



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DEBI MUMFORD, : No. 01-1961-C.D.
Plaintiff, :
v. :
KAREN L. STOTTISH, :
Defendant. :

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

TO: *Nationwide Insurance Companies*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records in your possession pertaining to Claim #6139K168113082199 and Debi Mumford, SS#115-62-9283, Date of Birth: 6/12/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____, 2002

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

DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

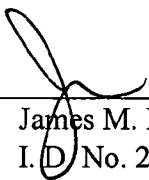
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Prerequisite to Service of Subpoenas to Produce Documents and Things directed to: Swan & Shong (Barbara E. Swan, M.D.), Center for Orthopedics & Sports Medicine (Douglas S. Fugate, M.D.), State Farm Insurance Companies, and Nationwide Insurance Companies, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 19th day of June, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

: No. 01-1961-C.D.

:
: TYPE OF PLEADING:
: **Certificate of Service**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

AUG 14 2002

m12:15:10cc
William A. Shaw
Prothonotary *WAS*

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

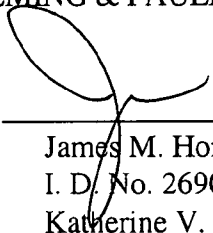
DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's First Set of Requests for Admission with Corresponding Interrogatories and Requests for Production of Documents for Answer by Plaintiff in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 13th day of August, 2002, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-C.D.

Type of pleading

NOTICE OF SERVICE

Filed on behalf of:

PLAINTIFF

Counsel of record for
this party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

FILED

NOV 19 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.


KAREN L. STOTTISH,
Defendant

No. 01-1961-C.D.

**NOTICE OF SERVICE OF ANSWERS TO
DEFENDANT'S FIRST SET OF REQUESTS
FOR ADMISSION WITH CORRESPONDING
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS
FOR ANSWER BY PLAINTIFF**

This is to certify that on the 19th day of November, 2002, I
served an original and one copy of Answers to Defendant's First Set of
Requests for Admission with Corresponding Interrogatories and
Requests for Production of Documents for Answer by Plaintiff by first
class mail, postage prepaid, to:

James M. Horne, Esq.
McQuaide Blasko
811 University Drive
State College, PA 16801-6699


Anthony S. Guido
Attorney for Plaintiff

FILED

9:54 AM
NOV 19 2002

William A. Shaw
Prothonotary

leg
Attg Guido
K25

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-C.D.

Type of Pleading:

NOTICE OF SERVICE

Filed on Behalf of:

PLAINTIFF

Counsel of Record for
This Party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

FILED

DEC 23 2002

William A. Shaw
Prothonotary

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant


:
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No. 01-1961-C.D.

NOTICE OF SERVICE

I, Anthony S. Guido, of Hanak, Guido and Taladay, being counsel of record for Plaintiff, do hereby certify that I propounded on Defendant, via United States mail, first class, postage pre-paid, this 20th day of December, 2002, Plaintiff's RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS to the below indicated person, at said address, being counsel of record for the Plaintiff:

James M. Horne, Esq.
Attorney for Defendant
McQuaide Blasko
811 University Drive
State College, PA 16801-6699



Anthony S. Guido,
Attorney for Plaintiff

FILED

M 18:50-8H
DEC 23 2002

NO
cc
C
not

William A. Shaw
Prothonotary

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

DEBI MUMFORD,

Plaintiff,

v.

KAREN L. STOTTISH,

Defendant.

No. 01-1961-C.D.

TYPE OF PLEADING:
Certificate of Readiness

TYPE OF CASE: CIVIL
FILED ON BEHALF OF:
DEFENDANT

COUNSEL OF RECORD FOR
FOR THIS PARTY:
JAMES M. HORNE, ESQ.
I.D. NO. 26908
KATHERINE V. OLIVER, ESQ.
I.D. NO. 77069
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801
PH# (814) 238-4926
FAX#(814) 238-9624

FILED

APR 07 2003

4/2/20/03
William A. Shaw
Prothonotary

COPY TO C/N

9
KES

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

DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

CERTIFICATE OF READINESS

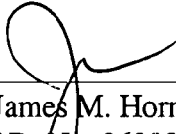
The undersigned hereby certifies:

1. This matter has been at issue more than twenty (20) days.
2. All pre-trial discovery is completed.
3. There are no pending pre-trial motions.
4. This case is not subject to compulsory arbitration or has been appealed therefrom.
5. This matter is to be heard by a jury.

Respectfully submitted,

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: April 4, 2003

By: 
James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

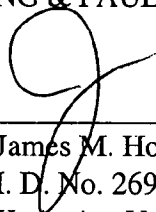
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate of Readiness in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 4th day of April, 2003, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: _____


James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

CIVIL ACTION

No. 01-1961-C.D.

Type of Pleading:

**PRAECIPE FOR
DISCONTINUANCE**

Filed on Behalf of:

PLAINTIFF

Counsel of Record for
This Party:

Anthony S. Guido, Esq.
Supreme Court No. 05877
Hanak Guido and Taladay
498 Jeffers Street
P. O. Box 487
DuBois, PA 15801

814-371-7768

FILED

JUL 21 2003

William A. Shaw
Prothonotary

[Handwritten signature]

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

DEBI MUMFORD,
Plaintiff

vs.

KAREN L. STOTTISH,
Defendant

:
:
:
:
:
:
:
:

No. 01-1961-C.D.

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Kindly mark the above referenced matter settled and
discontinued.



Anthony S. Guido,
Attorney for Plaintiff

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

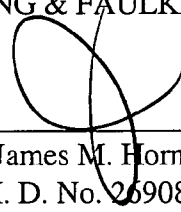
DEBI MUMFORD,	:	No. 01-1961-C.D.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KAREN L. STOTTISH,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Praecipe for Discontinuance in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 18th day of July, 2003, to the attorney of record:

Anthony S. Guido, Esquire
Hanak, Guido & Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

COPY

CIVIL DIVISION

Debi Mumford

Vs.

No. 2001-01961-CD

Karen L. Stottish

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 July 21, 2003, marked:

Discontinued and Settled

Record costs in the sum of \$207.17 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 21st day of July A.D. 2003.

William A. Shaw, Prothonotary