

01-1967-CD  
DEBI MONTFORD -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-CO

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. : No. 01-1961-CO  
KAREN L. STOTTISH, :  
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 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. : No. 01-1961 -CO  
KAREN L. STOTTISH, :  
Defendant :

**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.

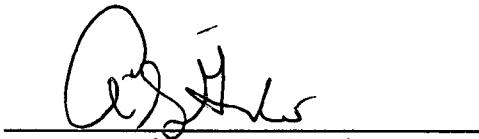
11. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, as suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

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

FILED

DEC 05 2001 atty pd \$80.00

11/10:28 a.m.

William A. Shaw

Prothonotary

1cc to atty  
2cc to sheriff

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

DEBI MUMFORD,

: No. 01-1961-C.D.

Plaintiff,

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

v.

KAREN L. STOTTISH,

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

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

1/11/15/nocl *ws*

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. :

**AMENDED PRAECIPE FOR ENTRY OF APPEARANCE**

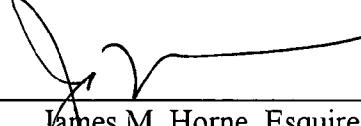
TO THE PROTHONOTARY:

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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

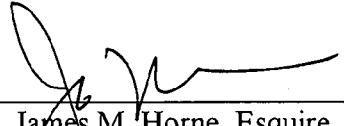
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of our Amended Praeclipe for Entry of Appearance on behalf the Defendant, in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 4<sup>th</sup> 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.

85.17

**FILED**

012:15  
JAN 16 2002

William A. Shaw  
Prothonotary

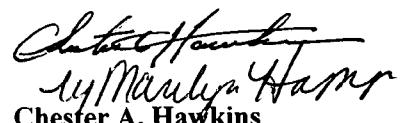


Sworn to Before Me This

16 Day Of January 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  
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 above and this 19th

day of January 19 2002

By Dale W. Overman

So Answers,

Dale W. Overman

Deputy

Thomas A. Demko  
JEFFERSON COUNTY, PENNSYLVANIA

# COPY

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEBI MUMFORD,  
Plaintiff  
vs.  
KAREN L. STOTTISH,  
Defendant

CIVIL ACTION  
No. 01-1961-CQ

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:

*William L. Hause*  
Prothonotary

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

DEBI MUMFORD,

Plaintiff

vs.

No. 01-1961-CO

KAREN L. STOTTISH,

Defendant

NOTICE

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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. : No. 01-1961-CO  
: :  
KAREN L. STOTTISH, :  
Defendant :  
:

**COMPLAINT**

AND NOW, comes the Plaintiff, Debi Mumford, and hereby  
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averring as follows:

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who resides at 166 Third Street, Falls Creek, Jefferson County,  
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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.

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vehicle being operated by James B. Schubert.

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operating a 1998 Ford Expedition owned by Defendant, Karen L.  
Stottish, and Gerald H. Stottish, also in a northerly direction on route  
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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.

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

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

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- (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:

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- (g) Left forearm swelling with diffused tenderness in the left forearm;
- (h) Severe bruise of the tailbone of the Plaintiff;
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- (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.

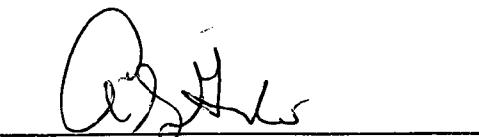
11. As a result of the Defendant's negligence, Plaintiff, Debi Mumford, as suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

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, : No. 01-1961-C.D.  
Plaintiff, : TYPE OF PLEADING:  
v. : **CERTIFICATE OF SERVICE**  
KAREN L. STOTTISH, : TYPE OF CASE: CIVIL  
Defendant. : 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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

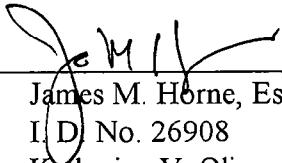
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's 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. 1<sup>st</sup> Class Mail, postage prepaid, on this 24 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

millis01noc<

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,

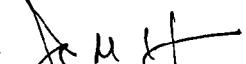
Defendant.

**CERTIFICATE 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 24 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  
ID. 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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

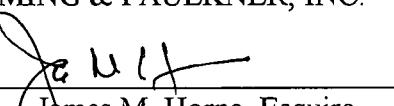
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant 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 24<sup>th</sup> 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 26 2002

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, : TYPE OF PLEADING:  
v. : **ANSWER WITH NEW MATTER**  
KAREN L. STOTTISH, :  
Defendant. : 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 30 2002

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.

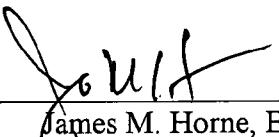
**NOTICE TO PLEAD**

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.

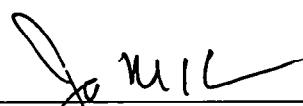
18. Plaintiff's injuries and damages, if any, are caused in whole or in part by virtue of other pre-existing conditions and/or other accidents, which are in no way the responsibility of the Defendant herein.

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  
I.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  
KAREN L. STOTTISH

Dated: 1/24/02, 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, :

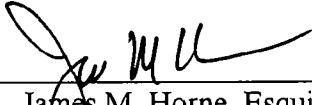
Defendant. :

**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. 1<sup>st</sup> Class Mail, postage prepaid, on this 29<sup>th</sup> 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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

Defendant. :

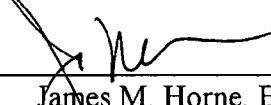
**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF SUBPOENAS**  
**PURSUANT TO RULE 4009.22**

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,

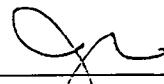
Defendant.

**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.s.

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,

Plaintiff

v.

No. 01-1961-C.D.

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: \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

**COPY**

DEBI MUMFORD,

Plaintiff,

v.

No. 01-1961-C.D.

KAREN L. STOTTISH,

Defendant.

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

TO: *Keystone Rehab. Systems*

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,

v.

No. 01-1961-C.D.

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: *Stanley Lang, M.D./Agape Family Health 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: *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

v.

KAREN L. STOTTISH,

Defendant

No. 01-1961-C.D.

**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*

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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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

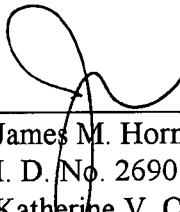
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Certificate 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. 1<sup>st</sup> Class Mail, postage prepaid, on this 31<sup>st</sup> 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, : CIVIL ACTION  
Plaintiff :  
vs. : No. 01-1961-C.D.  
KAREN L. STOTTISH, : Type of pleading  
Defendant : **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.



---

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  
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,

: No. 01-1961-C.D.

Plaintiff,

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

v.

KAREN L. STOTTISH,

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

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/w  
William A. Shaw  
Prothonotary

WO C/L G/R  
GPD

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, :

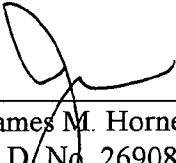
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Notice of Deposition of Plaintiff in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 28<sup>th</sup> 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,

No. 01-1961-C.D.

Plaintiff,

TYPE OF PLEADING:  
**Certificate of Service**

v.

KAREN L. STOTTISH,

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

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

11:42 AM '02

William A. Shaw  
Prothonotary

*E.K.S.*

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, :

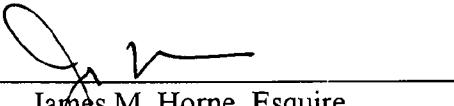
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Notice of Rescheduled Deposition of Plaintiff in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 3<sup>rd</sup> 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,

: No. 01-1961-C.D.

Plaintiff,

: TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

v.

KAREN L. STOTTISH,

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

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

0124310CC

William A. Shaw  
Prothonotary

1805

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, :

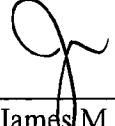
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's 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. 1<sup>st</sup> Class Mail, postage prepaid, on this 30/1 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, : No. 01-1961-C.D.  
: Plaintiff, : TYPE OF PLEADING:  
v. : **Prerequisite to Service of Subpoenas**  
: **w/Certificate of Service**  
: KAREN L. STOTTISH, : TYPE OF CASE: CIVIL  
: Defendant. : 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

7/11/2002 no cc  
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. :  
:

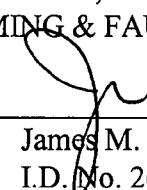
CERTIFICATE  
PREREQUISITE TO SERVICE OF SUBPOENA  
PURSUANT TO RULE 4009.22

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, : No. 01-1961-C.D.

Plaintiff, :

v. :

KAREN L. STOTTISH, :

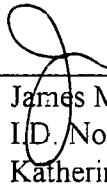
Defendant. :

**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: 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

**COPY**

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

**COPY**

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

COPY

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

**COPY**

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

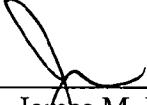
DEBI MUMFORD, : No. 01-1961-C.D.  
: :  
Plaintiff, : :  
: :  
v. : :  
: :  
KAREN L. STOTTISH, : :  
: :  
Defendant. : :

**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. 1<sup>st</sup> Class Mail, postage prepaid, on this 14 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, : No. 01-1961-C.D.  
Plaintiff, : TYPE OF PLEADING:  
v. : Certificate of Service  
KAREN L. STOTTISH, : TYPE OF CASE: CIVIL  
Defendant. : 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

Wm | 2:15| 1008 C  
William A. Shaw  
Prothonotary

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

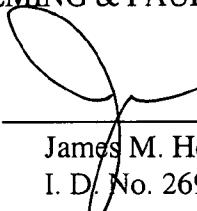
DEBI MUMFORD, : No. 01-1961-C.D.  
: :  
Plaintiff, : :  
: :  
v. : :  
: :  
KAREN L. STOTTISH, : :  
: :  
Defendant. : :

**CERTIFICATE 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. 1<sup>st</sup> Class Mail, postage prepaid, on this 13<sup>th</sup> 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 10 2002

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

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

**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  
Anthony S. Guido  
Attorney for Plaintiff

**FILED**

915485  
NOV 19 2002

cc  
Atty Guido  
GCB

William A. Shaw  
Prothonotary

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

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**

NO

cc

11-50818-H  
M 8/18/02  
DEC 23 2002

**Exct**

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, : TYPE OF PLEADING:  
: v. : Certificate of Readiness  
: :  
: KAREN L. STOTTISH, : TYPE OF CASE: CIVIL  
: Defendant. : 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

4/22/03  
William A. Shaw  
Prothonotary

COPY TO C/n

9  
FBI

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**

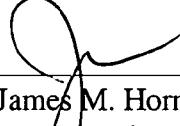
The undersigned hereby certifies:

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

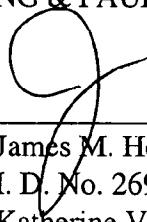
DEBI MUMFORD, : No. 01-1961-C.D.  
: :  
Plaintiff, : :  
: :  
v. : :  
: :  
KAREN L. STOTTISH, : :  
: :  
Defendant. : :

**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. 1<sup>st</sup> Class Mail, postage prepaid, on this 4<sup>th</sup> 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, : CIVIL ACTION  
Plaintiff :  
vs. : No. 01-1961-C.D.  
KAREN L. STOTTISH, : Type of Pleading:  
Defendant : **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

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JUL 21 2003

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 :  
:

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Kindly mark the above referenced matter settled and  
discontinued.



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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. 1<sup>st</sup> Class Mail, postage prepaid, on this 18<sup>th</sup> 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

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

By: \_\_\_\_\_

James M. Horne, Esquire  
I. D. No. 25908  
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 DIVISION

COPY

**Debi Mumford**

**Vs.**  
**Karen L. Stottish**

**No. 2001-01961-CD**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA  
County of Clearfield

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

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William A. Shaw, Prothonotary