

01-2038-0D
WALTER P. CONKLIN, JR. -vs- JOAN BROWN VAUGHN et al

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - **2038** - CD

Type of Pleading:

Complaint

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

DEC 20 2001

01/3301 atty Naddeo
William A. Shaw
Prothonotary

pl \$80.00

ICC Sherry

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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No. 01 - - CD

NOTICE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
Market and Second Streets
Clearfield, PA 16830

(814) 765-2641

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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No. 01 - - CD

COMPLAINT

NOW COMES the Plaintiff, Walter P. Conklin, Jr., and
by his attorney, James A. Naddeo, Esquire, sets forth the
following:

1. That the Plaintiff, Walter P. Conklin, Jr., is a
sui juris, adult individual whose address is P. O. Box 121, Red
Jacket Road, West Decatur, Pennsylvania 16878.

2. That the Defendant, Joan Brown Vaughn, is a sui
juris, adult individual whose address is P. O. Box 207, Hawley,
TX 79525.

3. That the Defendant, Glenn National Carriers, Inc.,
is a corporation having its principal place of business located
at Rt. 1, Box 539, Stillwater, OK 74074.

First Count

Walter P. Conklin, Jr. v. Joan Brown Vaughn

4. That on or about October 4, 2000 at approximately 3:35 p.m., E.D.S.T., the Plaintiff, Walter P. Conklin, Jr., was the owner and operator of a 1993 Chevrolet Baretta bearing Pennsylvania Registration No. BSD2215.

5. That on or about the said day and at or about the said time, the Defendant, Joan Brown Vaughn, was the operator of a 2000 Eagle International tractor in combination with a trailer which tractor and trailer combination was owned by the Defendant, Glenn National Carriers, Inc.

6. That on or about the said day and at or about the said time, it was daylight, there were no adverse weather conditions and the roadway was dry.

7. That State Route 322 is a two-lane, macadam highway which proceeds in a generally east to west direction through the Township of Decatur, Clearfield County, Pennsylvania.

8. That on or about the day and at or about the said time, the Plaintiff was operating his motor vehicle in the east bound lane of State Route 322 where he had reached a point approximately one mile to the West of the Borough of Philipsburg.

9. That on or about the said day and at or about the said time, the Defendant, Joan Brown Vaughn, was operating the tractor/trailer combination in the West bound lane of State Route 322 where she had likewise reached a point approximately one mile to the West of the Borough of Philipsburg.

10. That on or about the said day and at or about the said time, the Defendant, Joan Brown Vaughn, was unable to stop the tractor/trailer combination that she was operating in order to avoid a rear end collision with another vehicle which was then and there stopped in the West bound lane of State Route 322 waiting for a third vehicle to effect a left hand turn.

11. That on or about the said day and at or about the said time, the Defendant, Joan Brown Vaughn, applied her brakes at which time the tractor/trailer combination jackknifed causing the right side of the tractor to impact with the rear of the stopped vehicle preceding it at which time the tractor proceeded into the east bound lane of State Route 322 where the front end of the tractor impacted with the left side of the vehicle operated by the Plaintiff, Walter P. Conklin, Jr.

12. That as a result of the collision described in Paragraph 11 hereof, which is incorporated herein by reference, the Plaintiff, Walter P. Conklin, Jr., suffered numerous and serious injuries as hereinafter described.

13. That the Defendant, Joan Brown Vaughn, was guilty of the following negligence, recklessness and carelessness which was the proximate cause of the accident and the injuries received by the Plaintiff, Walter P. Conklin, Jr., as follows:

A. The Defendant, Joan Brown Vaughn, failed to have her vehicle under proper control;

B. The Defendant, Joan Brown Vaughn, failed to maintain a proper lookout;

C. The Defendant, Joan Brown Vaughn, violated the Motor Vehicle Code of 1976, June 17, P.L. Section 3714, 75 Pa.C.S.A. Section 3714, and supplements thereto, in that she operated her vehicle upon State Route 322 with careless disregard for the safety of the Plaintiff, Walter P. Conklin, Jr.

D. That the Defendant, Joan Brown Vaughn, violated the Motor Vehicle Code of 1976, June 17, P.L. Section 3736, 75 Pa.C.S.A. Section 3736, and supplements thereto, in that she operated her vehicle upon State Route 322 in willful or wanton disregard for the safety of the person of the Plaintiff, Walter P. Conklin, Jr.

E. That the Defendant, Joan Brown Vaughn, violated the Motor Vehicle Code of 1976, June 17, P.L. Section 3309, 75 Pa.C.S.A. Section 3309, and

supplements thereto, in that she failed to operate her vehicle upon State Route 322 within a single lane and moved from said lane of travel without having first ascertained that said movement could be made with safety.

F. That the Defendant, Joan Brown Vaughn, was negligent, careless and reckless in that she failed to use due care under all of the circumstances of the case.

14. That as a result of the negligence, recklessness and carelessness of the Defendant, Joan Brown Vaughn, as set forth in Paragraph 13 hereof and incorporated herein by reference, the Plaintiff, Walter P. Conklin, Jr., received serious and extensive injuries which may and probably will be permanent as follows:

A. Type II open comminuted olecranon fracture with multiple soft tissue lacerations left elbow.

B. Various bruises and contusions.

15. That the Plaintiff, Walter P. Conklin, Jr., has or will be required to expend sums for the treatment of the injuries referred to in Paragraph 14 hereof and will continue to incur medical services for an indefinite period of time in the future.

16. That as a result of the injuries referred to in Paragraph 14 hereof which is incorporated herein by reference, the Plaintiff, Walter P. Conklin, Jr., suffers serious and permanent physical impairment which substantially prohibits his ability to engage in the normal and usual functions which he enjoyed prior to the accident, including but not limited to his household duties, hobbies and social relationships.

17. That as a result of the injuries referred to in Paragraph 14 hereof which is incorporated herein by reference, the Plaintiff, Walter P. Conklin, Jr., was unable to perform the duties of his regular occupation from the date of the accident until January 10, 2001 during which time he was partially compensated for his lost wages in the amount of One Thousand (\$1,000.00) Dollars per month.

18. That as a result of the injuries referred to in Paragraph 14 hereof which is incorporated herein by reference, Walter P. Conklin, Jr., suffered serious and permanent physical impairment which substantially impairs his earning power.

19. That the Plaintiff, Walter P. Conklin, Jr., claims a reasonable amount for the following:

A. A reasonable amount for pain and suffering; past, present and future;

B. Cost of replacing household services;

C. Privation and inconvenience due to the injuries and treatment, past, present and future;

D. Impairment of earning power and lost wages;

E. Mental anguish and depression resulting from the accident;

F. Other damages allowable by law.

WHEREFORE, Plaintiff, Walter P. Conklin, Jr., claims unliquidated damages against the Defendant, Joan Brown Vaughn, in an amount in excess of Twenty-Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.

Second Count

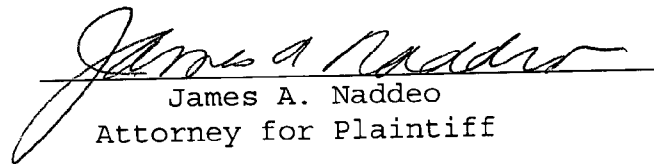
Walter P. Conklin, Jr. v. Glenn National Carriers, Inc.

20. That the Plaintiff, Walter P. Conklin, Jr., incorporates Paragraphs 1 through 19 of the First Count of this Complaint by reference and makes them a part hereof.

21. That at all times referred to herein, the Defendant, Joan Brown Vaughn, was acting within the scope her of her employment and the furtherance of the business of the Defendant, Glenn National Carriers, Inc.

WHEREFORE, the Plaintiff, Walter P. Conklin, Jr., claims unliquidated damage against the Defendant, Glenn National

Carriers, Inc., in an amount in excess of Twenty-Five Thousand
(\$25,000.00) Dollars.


James A. Naddeo
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared
WALTER P. CONKLIN, JR., who being duly sworn according to law,
deposes and states that the facts set forth in the foregoing
Complaint are true and correct to the best of his knowledge,
information and belief.

Walter P. Conklin, Jr.
Walter P. Conklin, Jr.

SWORN and SUBSCRIBED before me this 20th day of December, 2001.

Linda C. Lewis
Notarial Seal
Linda C. Lewis, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires July 25, 2003

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

28 Jan 02 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

[Signature]
Deputy Prothonotary

MARCH 20, 2002 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

[Signature]
Deputy Prothonotary

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

Praecipe to Reinstate
Complaint

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

JAN 28 2002

William A. Shaw
Prothonotary

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

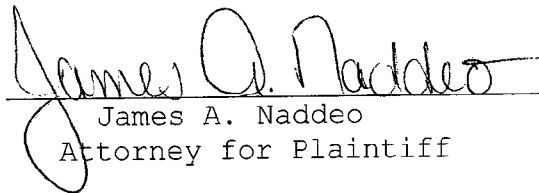
JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please reinstate the Complaint filed in the above-captioned case.


James A. Naddeo
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

1 am over martin

FILED

Ab CC

013:39-81

JAN 28 2002

1 Reinstated

to Shift

William A. Shaw
Prothonotary

Atty pd. 7.00

~~9.00~~

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WALTER P. CONKLIN, an Individual,

Plaintiff,

vs.

JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation,

Defendants.

CIVIL DIVISION

No. 01-2038-CD

PRAECIPE FOR APPEARANCE

Filed on Behalf of Defendants:
JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation

Counsel of Record for Defendant:

JOHN F. DEASY, ESQUIRE
PA I.D. #63269

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.
2900 USX Tower
600 Grant Street
Pittsburgh, PA 15219
412-803-1140

FILED

MAR 04 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WALTER P. CONKLIN, an Individual,

CIVIL DIVISION

Plaintiff,

No.

vs.

JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation,

Defendants.

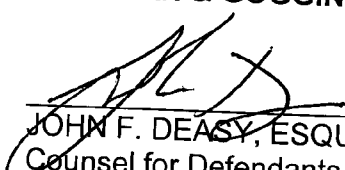
PRAECIPE FOR APPEARANCE

TO: Prothonotary, Clearfield County

KINDLY, enter the Appearance of JOHN F. DEASY, ESQUIRE, and MARSHALL,
DENNEHEY, WARNER, COLEMAN & GOGGIN on behalf of Defendants, JOAN
BROWN VAUGHN, an Individual and GLENN NATIONAL CARRIERS, INC., a
corporation in the above-captioned action.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**




JOHN F. DEASY, ESQUIRE
Counsel for Defendants, JOAN BROWN
VAUGHN, an Individual and GLENN
NATIONAL CARRIERS, INC., a corporation

CERTIFICATE OF SERVICE

I hereby certify that I have served upon all persons listed below a true and correct copy of **PRAECIPE FOR APPEARANCE** in the above-captioned matter this 26 day of February, 2002 by regular mail, addressed to the following:

James A. Naddeo, Esquire
211 1/2 East Locust Street
Marino Building
P.O. Box 552
Clearfield, PA 16830
(Counsel for Plaintiff)


JOHN F. DEASY, ESQUIRE
Attorney for Defendants

\\12_A\\LIAB\\WDL\\PG\\213049\\KAC\\03097\\00520

FILED

1cc

MAR 04 2002

William A. Shaw
Prothonotary

Att'y
C. J. Shaw

In The Court of Common Pleas of Clearfield County, Pennsylvania

CONKLIN, WALTER P., JR.

Sheriff Docket # 11892

01-2038-CD

VS.

VAUGHN, JOAN BROWN & GLENN NATIONAL CARRIERS

COMPLAINT

SHERIFF RETURNS

NOW JANUARY 7, 2002 MAILED THE WITHIN COMPLAINT TO GLENN NATIONAL CARRIERS, INC., DEFENDANT BY CERT. MAIL # 7000 0600 0022 9001 8133 AT RT. 1 BOX 539, STILLWATER, OK. 74074 BEING THEIR LAST KNOWN ADDRESS. THE LETTER IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "NO SUCH STREET NUMBER".

NOW JANUARY 7, 2002 MAILED THE WITHIN COMPLAINT TO JOAN BROWN VAUGHN, DEFENDANT BY CERT. MAIL # 7000 0600 0022 9001 8140 AT PO BOX 207, HAWLEY, TX. 79525 BEING HER LAST KNOWN ADDRESS. THE LETTER IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "UNCLAIMED". THE LETTER WAS SENT MARKED "ADDRESSEE ONLY".

Return Costs

Cost	Description
36.34	SHFF. HAWKINS PAID BY; ATTY.
20.00	SURCHARGE PAID BY: ATTY.

FILED

MAR 18 2002

01847

William A. Shaw
Prothonotary

Sworn to Before Me This

18th Day Of March 2002

William A. Shaw

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

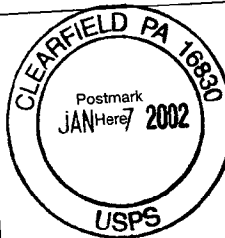
So Answers,

Chester A. Hawkins
Chester A. Hawkins
Sheriff

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

Article Sent to

Postage \$
Certified Fee \$
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$ 7.60



Name (Please Print Clearly) (to be completed by mailer)
JOAN BROWN VAUGHN

Street, Apt. No.; or PO Box No.
PO Box 207

City, State, ZIP+4
Hawley, TX. 79525

PS Form 3800, July 1999

See Reverse for Instructions

7000 0600 0022 9001 8140

Certified Mail Provides:

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

Important Reminders:

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

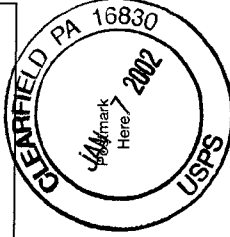
IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, July 1999 (Reverse)

102595-99-M-2087

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

Article Serial No.



Postage	\$ 80
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.40

Name (Please Print Clearly) (to be completed by mailer)

GLENN NATIONAL CARRIERS, INC.

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

Rt. 1 Box 539

City, State, ZIP+4

Stillwater, OK 74074

PS Form 3800, July 1995

See Reverse for Instructions

2000 0000 0000 2200 1006 1000 433

Certified Mail Provides:

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

26811

Important Reminders:

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

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

PS Form 3800, July 1999 (Reverse)

102595-99-M-2087

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

Praecipe to Reinstate
Complaint

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

MAR 20 2002

0/3:45/6m

William A. Shaw PP

Prothonotary - \$2.00

W/C

ISSUED REINSTATE CONSUMPTION
TO ATTY NADDEO

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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No. 01 - 2038 - CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please reinstate the Complaint filed in the above-
captioned case on December 20, 2001.

James A. Naddeo

James A. Naddeo
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11892

CONKLIN, WALTER P., JR.

01-2038-CD

VS.

VAUGHN, JOAN BROWN & GLENN NATIONAL CARRIERS

COMPLAINT

SHERIFF RETURNS

NOW FEBRUARY 5, 2002 SERVED THE WITHIN COMPLAINT ON GLENN NATIONAL CARRIERS, INC., DEFENDANT BY CERT. MAIL # 7000 0600 0022 9001 8010 AT 7809 EAST SIXTH ST., STILLWATER, OK. 74074 BEING THEIR LAST KNOWN ADDRESS. THE RETURN RECEIPT IS HERETO ATTACHED AND MADE A PART OF THIS RETURN ENDORSED BY PEGGY DIESEL.

Return Costs

Cost Description

13.74 SHFF. HAWKINS PAID BY; ATTY.

10.00 SURCHARGE PAID BY: *atty*

FILED

MAR 21 2002

0133011000
William A. Shaw
Prothonotary *EPR*

Sworn to Before Me This

26 Day Of *March* 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 Marty Harris

Chester A. Hawkins
Sheriff

SENDER: COMPLETE THIS SECTION

- ☐ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

GLENN NATIONAL CARRIERS INC
7809 East Sixth St.
Stillwater, OK 74074

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **PEGGY DISER** B. Date of Delivery: **2-5-02**

C. Signature

X *Peggy Diser* ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☒ No
If YES, enter delivery address below:

3. Service Type

- ☒ Certified Mail ☐ Express Mail
- ☐ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)

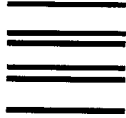
7000 0600 0022 9001 8010

PS Form 3811, July 1999

Domestic Return Receipt

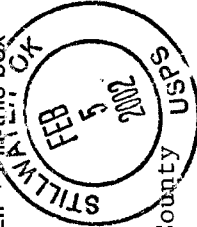
102595-99-M-1789

UNITED STATES POSTAL SERVICE



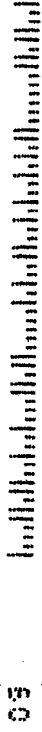
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •



CHESTER A. HAWKINS
Sheriff of Clearfield County
1 N. 2nd St. Suite 116
Clearfield, Pa. 16830

11892



7000 0600 0022 9001 8010

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

Article Number

Postage \$ 3.50

Certified Fee
Return Receipt Fee
(Endorsement Required)
Restricted Delivery Fee
(Endorsement Required)

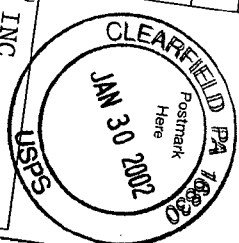
Total Postage & Fees

\$ 4.40

Name (Please Print Clearly) (to be completed by mailer)
GLENN NATIONAL CARRIERS INC

Street, Apt. No., or PO Box No.
7809 East Sixth St.

City, State, ZIP+4
Stillwater, OK 74074



See Reverse for US

..... Mail Provides:

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

Save this receipt and present it with your return.
JULY 1999 (Reverse)

July 1999 (Reverse)

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

ACCEPTANCE OF SERVICE

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

MAR 28 2002

O/10:37/ NOCC
William A. Shaw
Prothonotary

JAMES A. NADDEO
ATTORNEY AT LAW
211½ EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

Jan over margin

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WALTER P. CONKLIN, an Individual,

CIVIL DIVISION

Plaintiff,

No. 01-2038-CD

vs.

ANSWER AND NEW MATTER

JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation,

Filed on Behalf of Defendants:
JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation

Defendants.

Counsel of Record for Defendant:

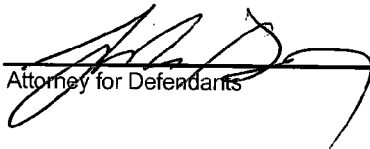
TO: PLAINTIFF

JOHN F. DEASY, ESQUIRE
PA I.D. #63269

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

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.


2900 USX Tower
600 Grant Street
Pittsburgh, PA 15219
412-803-1140


Attorney for Defendants

FILED

APR 08 2002

m/1156/110cc

William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WALTER P. CONKLIN, an Individual, CIVIL DIVISION

Plaintiff, No. 01-2038-CD

vs.

JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation,

Defendants.

ANSWER AND NEW MATTER

AND NOW, comes Defendants, JOAN BROWN VAUGHN, an Individual and GLENN NATIONAL CARRIERS, INC., a corporation by and through their attorneys, MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN and JOHN F. DEASY, ESQUIRE, and in response to the Plaintiff's Complaint files the within Answer and New Matter and in support thereof avers as follows:

1. After reasonable investigation, the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.
2. Admitted in part and denied in part. It is admitted Joan Brown Vaughn is an adult individual. Her current address is 3501 Curry Lane, Apt. 601, Abaleen, Texas 79606.
3. Paragraph 3 of Plaintiff's Complaint is denied. Defendant's principal place of business is 11900 Stagecoach Road, Little Rock, AK 72209.

First Count – Walter P. Conklin, Jr. v. Joan Brown Vaughn

4. After reasonable investigation, the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

5. Paragraph 5 of the Plaintiff's Complaint is admitted in part and denied in part. It is admitted Defendant Vaughn operated the aforesaid vehicle. It is denied the tractor was owned by Defendant Glenn National.

6. Paragraph 6 of the Plaintiff's Complaint is admitted.

7. Paragraph 7 of the Plaintiff's Complaint is admitted.

8. Paragraph 8 of the Plaintiff's Complaint is admitted to the extent that it alleges Plaintiff was operating a motor vehicle in the eastbound lane of State Route 322 at the time and place aforesaid. In response to the remaining allegations of paragraph 8, after reasonable investigation, the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

9. Paragraph 9 is admitted to the extent that it alleges Defendant Vaughn was operating the aforesaid tractor trailer in the westbound lane of State Route 322 at the time and place aforesaid. In response to remaining allegations of paragraph 9 of Plaintiff's Complaint, after reasonable investigation, the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

10. Paragraph 10 of the Plaintiff's Complaint is admitted.

11. Paragraph 11 of the Plaintiff's Complaint is admitted.

12. After reasonable investigation, the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

13. Paragraph 13, including subparagraphs (a) through (f) of the Plaintiff's Complaint, is denied.

14. Paragraph 14 of the Plaintiff's Complaint is denied to the extent that it alleges these Defendants were negligent, reckless and careless. In response to the allegation regarding Plaintiff's alleged injuries, after reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

15. In response to paragraph 15 of the Plaintiff's Complaint, after reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

16. After reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

17. After reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

18. After reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

19. After reasonable investigation the Defendants are without knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained therein.

WHEREFORE, Defendants demand judgment in their favor and against the Plaintiff.

Second Count – Walter P. Conklin, Jr. v. Glenn National Carriers, Inc.

20. Paragraphs 1 through 19 are referred to and incorporated as if set forth fully at length herein.

21. Paragraph 21 of Plaintiff's Complaint is denied. It is specifically denied Defendant Vaughn was the employee of Defendant Glenn National Carrier, Inc. Rather, Vaughn was an employee of Kyte, Inc.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiff.

NEW MATTER

22. Paragraphs 1 through 21 are referred to and incorporated as if set forth fully at length herein.

23. Defendants plead the applicable provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. C.S.A. §1701 et seq. as a defense to the Plaintiff's Complaint.

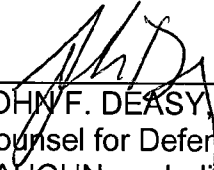
24. Defendants plead the Sudden Emergency Doctrine as a defense to the Plaintiff's claims.

25. The accident described in the Plaintiff's Complaint was an unavoidable accident and, therefore, these Defendants are not responsible for Plaintiff's alleged injuries and damages.

WHEREFORE, Defendants demand judgment in their favor and against Plaintiff.

Respectfully submitted,

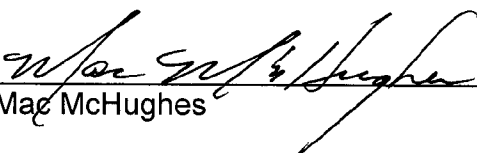
**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**



JOHN F. DEASY, ESQUIRE
Counsel for Defendants, JOAN BROWN
VAUGHN, an Individual and GLENN
NATIONAL CARRIERS, INC., a corporation

VERIFICATION

I, Mac McHughes, verify that the averments of fact made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, understanding and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsifications to authorities.

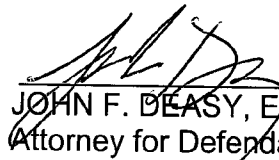

Mac McHughes

DATE: 3-12-02

CERTIFICATE OF SERVICE

I hereby certify that I have served upon all persons listed below a true and correct copy of **ANSWER AND NEW MATTER** in the above-captioned matter this 4 day of April, 2002 by regular mail, addressed to the following:

James A. Naddeo, Esquire
211 1/2 East Locust Street
Marino Building
P.O. Box 552
Clearfield, PA 16830
(Counsel for Plaintiff)



JOHN F. DEASY, ESQUIRE
Attorney for Defendants

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

APR 17 2002
01340170cc
William A. Shaw
Prothonotary

[Handwritten signature]

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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No. 01 - 2038 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of Plaintiff's Answers to Interrogatories and Plaintiff's Answer to Request for Production of Documents in the above-captioned action were served on the following person and in the following manner on the 17th day of April, 2002:

First-Class Mail, Postage Prepaid

John Deasy, Esquire
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
US Steel Tower, Suite 2900
600 Grant Street
Pittsburgh, PA 15219


James A. Naddeo
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

1
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
WALTER P. CONKLIN, an Individual,
Plaintiff,

CIVIL DIVISION

No. 01-2038-CD

vs.

**VERIFICATION TO ANSWER AND NEW
MATTER OF DEFENDANT JOAN
BROWN VAUGHN**

JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation,
Defendants.

Filed on Behalf of Defendants:
JOAN BROWN VAUGHN, an Individual
and GLENN NATIONAL CARRIERS, INC.,
a corporation

Counsel of Record for Defendant:

JOHN F. DEASY, ESQUIRE
PA I.D. #63269

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.
2900 USX Tower
600 Grant Street
Pittsburgh, PA 15219
412-803-1140

FILED

JUN 06 2002

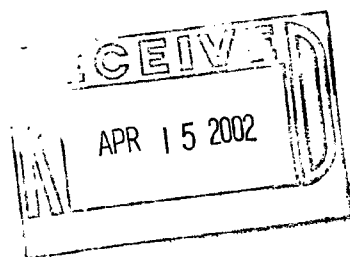
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William A. Shaw
Prothonotary *WAS*

VERIFICATION

I, Joan Brown Vaughn, verify that the averments of fact made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, understanding and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsifications to authorities.

Joan Brown Vaughn
Joan Brown Vaughn


DATE: 4-9-02



CERTIFICATE OF SERVICE

I hereby certify that I have served upon all persons listed below a true and correct copy of **VERIFICATION TO ANSWER AND NEW MATTER OF DEFENDANT JOAN BROWN VAUGHN** in the above-captioned matter this 4 day of June, 2002 by regular mail, addressed to the following:

James A. Naddeo, Esquire
211 1/2 East Locust Street
Marino Building
P.O. Box 552
Clearfield, PA 16830
(Counsel for Plaintiff)


JOHN F. DEASY, ESQUIRE
Attorney for Defendants

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

WALTER P. CONKLIN, an individual :

-VS-

: No. 01 - 2038 - CD

JOAN BROWN VAUGHN, an individual :

and GLEN NATIONAL CARRIERS, INC., :

a corporation :

ORDER

NOW, this 4th day of September, 2002, following status conference into the above-captioned matter, it is the ORDER of this Court that discovery, including depositions, shall be completed on or before January 15, 2003.

By the Court,

President Judge

FILED

SEP 04 2002

William A. Shaw
Prothonotary

FILED

SEP 04 2002

1cc Atty Nodded
1cc Atty Deasy

William A. Shaw
Prothonotary

[Signature]

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

OCT 03 2002
01:33:33 BA
William A. Shaw
Prothonotary

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

CONSENT ORDER

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

JAN 23 2003

William A. Shaw
Prothonotary

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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CA

William A. Shaw
Prothonotary

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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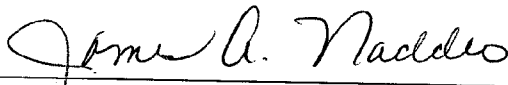
No. 01 - 2038 - CD

PRAECIPE TO LIST FOR TRIAL

TO THE PROTHONOTARY:

Please place the above-captioned matter on the next
list for trial. In support thereof I certify the following:

1. There are no Motions outstanding.
2. Discovery has been completed and the case is ready
for trial.
3. The case is to be heard jury.
4. Notice of the Praecipe has been given to opposing
counsel.
5. The time for trial is estimated at two (2) days.


James A. Naddeo, Esquire
Attorney for Plaintiff

Date: 5/29/03

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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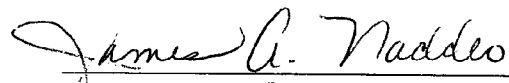
No. 01 - 2038 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of Praecept to List for Trial filed in the above-captioned action was served on the following person and in the following manner on the 29th day of May, 2002:

First-Class Mail, Postage Prepaid

John Deasy, Esquire
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
US Steel Tower, Suite 2900
600 Grant Street
Pittsburgh, PA 15219


James A. Naddeo, Esquire
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

CA

William A. Shaw
Prothonotary/Clerk of Courts

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

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No. 01 - 2038 - CD

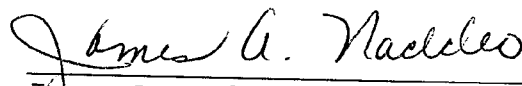
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, Attorney for Plaintiff, Walter P. Conklin, Jr., do hereby certify that a true and correct copy of Notice of Deposition of Mark A. Nartatez, D.O., in the above matter was served by first-class mail, postage prepaid, upon the following:

Mark A. Nartatez, D.O.
Geisinger Health System
Three Medical Center Drive
Philipsburg, PA 16866

John Deasy, Esquire
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
US Steel Tower, Suite 2900
600 Grant Street
Pittsburgh, PA 15219

Said Notice of Deposition was mailed this 30th day of July, 2003.


James A. Naddeo, Esquire
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.

No. 01 - 2038 - CD

Type of Pleading:

**PRAECIPE TO SETTLE
AND DISCONTINUE**

Filed on behalf of:
Plaintiff

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

SEP 03 2003

William A. Shaw
Prothonotary

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

WALTER P. CONKLIN, JR.,
an individual,
Plaintiff,

v.

JOAN BROWN VAUGHN,
an individual, and
GLENN NATIONAL CARRIERS,
INC., a corporation,
Defendants.


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No. 01 - 2038 - CD

PRAECIPE TO SETTLE AND DISCONTINUE

To the Prothonotary:

Please mark the above-captioned case settled and
discontinued.


James A. Naddeo, Esquire
Attorney for Plaintiff

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

FILED

03:34 PM Court Clerk

SEP 03 2003



William A. Shaw
Prothonotary

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

CIVIL DIVISION

Walter P. Conklin Jr

Vs.

No. 2001-02038-CD

Joan Brown Vaughn

Glenn National Carriers, Inc.

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 September 3, 2003, marked:

Discontinued, Settled and Ended

Record costs in the sum of \$174.08 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 3rd day of September A.D. 2003.

William A. Shaw, Prothonotary