

02-65-CD  
KAREN M. LEECH et al -vs- GREGORY ALAN SKUNDA

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

KAREN M. LEECH, individually  
and as parent and natural  
guardian of BRIAN F. LEECH and  
JOELLE C. LEECH,

Plaintiffs

vs.

GREGORY ALAN SKUNDA,  
Defendant

No. 02-65-6

Type of Pleading:

**COMPLAINT IN A  
CIVIL ACTION**

Filed on behalf of:  
**PLAINTIFFS**

Counsel of Record for  
This Party:

Jeffrey S. DuBois  
Supreme Court No. 62074  
Hanak, Guido and Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

**FILED**

JAN 14 2002

William A. Shaw  
Prothonotary  
Clearfield County

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

KAREN M. LEECH, individually  
and as parent and natural  
guardian of BRIAN F. LEECH and  
JOELLE C. LEECH,

Plaintiffs

vs.

GREGORY ALAN SKUNDA,  
Defendant

No. \_\_\_\_\_, 2002, C.D.

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 in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

Court Administrator  
Clearfield County Courthouse  
Second & Market Streets  
Clearfield, PA 16830  
(814) 765-2641 Ext. 1303

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

KAREN M. LEECH, individually  
and as parent and natural  
guardian of BRIAN F. LEECH and  
JOELLE C. LEECH,

Plaintiffs

vs.

No. \_\_\_\_\_, 2002, C.D.

GREGORY ALAN SKUNDA,  
Defendant

**COMPLAINT IN A CIVIL ACTION**

AND NOW, comes the Plaintiffs, KAREN M. LEECH, BRIAN F. LEECH and JOELLE C. LEECH, by and through their attorneys, HANAK, GUIDO AND TALADAY, and files this Complaint and in support thereof aver the following:

1. Plaintiff, KAREN M. LEECH, is an adult individual residing at 200 Main Street, Falls Creek, Jefferson County, Pennsylvania, 15840.
2. Plaintiff, JOELLE C. LEECH, date of birth February 2, 1986, is a minor, residing at 200 Main Street, Falls Creek, Jefferson County, Pennsylvania, 15840.
3. Plaintiff, BRIAN F. LEECH, date of birth August 4, 1993, is a minor, residing at 200 Main Street, Falls Creek, Jefferson County, Pennsylvania, 15840.
4. Defendant, GREGORY ALAN SKUNDA, is an adult individual residing at 122 West Second Avenue, DuBois, Clearfield County, Pennsylvania, 15801.

5. On or about February 6, 2000, Plaintiff, KAREN M. LEECH, was the owner of a 1987 Toyota Truck which was involved in the accident described herein.

6. On the aforesaid date, Defendant was the owner of a 1990 GMC Safari, which was involved in the accident described herein.

7. On the aforesaid date, at approximately 4:00 p.m., Plaintiff, KAREN LEECH, was operating her motor vehicle, with her children, Plaintiffs, JOELLE C. LEECH and BRIAN F. LEECH, in the vehicle with her on Quarry Avenue in the City of DuBois, Clearfield County, Pennsylvania, at approximately 300 Quarry Avenue, when her vehicle was struck in the front by Defendant's motor vehicle which was being operated by Defendant, traveling in the opposite direction on Quarry Avenue.

8. The accident occurred when Defendant, traveling in the opposite direction of Plaintiff on Quarry Avenue, crossed over the center line and entered Plaintiff's lane of traffic and crashed into Plaintiff's vehicle.

9. At the time of the accident described herein, Plaintiff was lawfully operated her vehicle on her side of the road on Quarry Avenue.

10. The accident was directly and proximately caused by the negligence and carelessness of Defendant, which consisted, among other things, of the following:

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

- (b) Operating his motor vehicle at an excessive rate of speed under the circumstances;
- (c) Operating his motor vehicle with no warning of approach or intended direction;
- (d) Not having his motor vehicle under proper control so as to stop said vehicle within an assured cleared distance ahead (75 Pa.Const.Stat. §3361);
- (e) Operating his motor vehicle without due regard to the rights, safety, and position of the Plaintiffs;
- (f) Failing to have his motor vehicle under the proper control so as to prevent his vehicle from striking the Plaintiff's motor vehicle;
- (g) Failing to keep a proper look out;
- (h) Failing to use due care under the circumstances;
- (i) Failing to notice the motor vehicle of Plaintiff;
- (j) Failing to take evasive action in order to avoid impacting with Plaintiff's vehicle;
- (k) Failing to apply his brakes in sufficient time to avoid striking Plaintiff's vehicle;
- (l) Operating his motor vehicle in disregard of the rules of the road, and the laws of the Commonwealth of Pennsylvania, including but not limited to the Motor Vehicle Code, 75 Pa.Con.Stat. §3361 and §3362; and

11. At all times material hereto, Plaintiff, KAREN M. LEECH, acted with due care and was not contributorily negligent.

COUNT ONE  
Karen M. Leech, Plaintiff

vs.  
Gregory Alan Skunda, Defendant.

12. Paragraphs 1 through 11 are incorporated herein by reference as though the same were set forth more fully at length.

13. As a result of Defendant's negligence, Plaintiff, KAREN M. LEECH, sustained the following injuries, some or all of which may be permanent:

- (a) Trauma to the face and jaw;
- (b) Several teeth were fractured;
- (c) Lacerations to both upper and lower lips, and general bruises and contusions to the facial region.

14. As a result of Defendant's negligence, Plaintiff, KAREN M. LEECH, has suffered great bodily pain and suffering as well as mental anxiety and nervousness, to her great detriment and loss.

15. As a result of Defendant's negligence, Plaintiff, KAREN M. LEECH, has sustained serious and permanent injuries, for the treatment of which she has incurred medical bills and expenses and will probably require further dental surgery in the future.

16. As a result of Defendant's negligence, Plaintiff, KAREN M. LEECH, has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

WHEREFORE, Plaintiff, KAREN M. LEECH, demands judgment against Defendant in an amount not excess of Twenty Thousand and 00/100 (\$20,000.00) Dollars, exclusive of interest and costs.

**COUNT TWO**  
**Joelle C. Leech, Plaintiff**  
**vs.**  
**Gregory Alan Skunda, Defendant.**

17. Paragraphs 1 through 11 are incorporated herein by reference as though the same were set forth more fully at length.

18. As a result of Defendant's negligence, Plaintiff, JOELLE C. LEECH, sustained the following injuries, some or all of which may be permanent:

- (a) Trauma to the face and head region;
- (b) Migraines;
- (c) Multiple lacerations;
- (d) Imbedded glass fragments in her forehead; and
- (e) General bruising and contusions.

19. As a result of Defendant's negligence, Plaintiff, JOELLE C. LEECH, has suffered great bodily pain and suffering as well as mental anxiety and nervousness, to her great detriment and loss.

20. As a result of Defendant's negligence, Plaintiff, JOELLE C. LEECH, has sustained serious and permanent injuries, for the treatment of which she has incurred medical bills and expenses and said minor child is under continued medical care for the above injuries.

21. As a result of Defendant's negligence, Plaintiff, JOELLE C. LEECH, has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

WHEREFORE, Plaintiff, JOELLE C. LEECH, demands judgment against Defendant not in excess of Twenty Thousand and 00/100 (\$20,000.00) Dollars, exclusive of interest and costs.

**COUNT THREE**  
**Brian F. Leech, Plaintiff**  
**vs.**  
**Gregory Alan Skunda, Defendant.**

22. Paragraphs 1 through 11 are incorporated herein by reference as though the same were set forth more fully at length.

23. As a result of Defendant's negligence, Plaintiff, BRIAN F. LEECH, sustained the following injuries, some or all of which may be permanent:

- (a) Trauma to the head and facial region;
- (b) Injury and soreness to the minor child's teeth;
- (c) General bruising, and contusions.

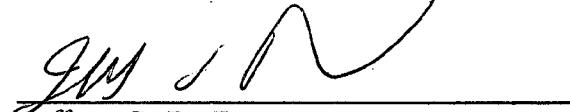
24. As a result of Defendant's negligence, Plaintiff, BRIAN F. LEECH, has suffered great bodily pain and suffering as well as mental anxiety and nervousness, to her great detriment and loss.

25. As a result of Defendant's negligence, Plaintiff, BRIAN F. LEECH, has sustained serious and permanent injuries, for the treatment of which he has incurred medical bills and expenses.

26. As a result of Defendant's negligence, Plaintiff, BRIAN F. LEECH, has suffered an interruption of his daily habits and pursuits to her great and permanent detriment and loss.

WHEREFORE, Plaintiff, BRIAN F. LEECH, demands judgment against Defendant in an amount not in excess of Twenty Thousand and 00/100 (\$20,000.00) Dollars, exclusive of interest and costs.

Respectfully submitted,



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Jeffrey S. DuBois  
Attorney for Plaintiffs

**VERIFICATION**

I, KAREN M. LEECH, individually and as parent and natural guardian of Brian F. Leech and Joelle C. Leech, verify that the statements in the foregoing Complaint are true and correct to the best of my knowledge, information and belief.

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

Karen M. Leech  
Karen M. Leech

FILED

JAN 14 1982

Settled in the amount of \$80,000  
between William A. Shaw  
and the Plaintiff

3ccatty

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F.  
LEECH and JOELLE C. LEECH,

Plaintiffs,

v.

GREGORY ALAN SKUNDA,

Defendant.

: No. 02-65-C.D.

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

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

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

**FILED**

JAN 30 2002

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02-65-C.D.  
Plaintiffs, : No. 02-65-C.D.  
v. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**PRAECIPE FOR ENTRY OF APPEARANCE**

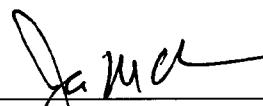
TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, GREGORY ALAN SKUNDA, in the above-captioned matter.

We are authorized to accept service on his behalf.

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

Dated: January 29, 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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02-65-C.D.  
: No. 02-65-C.D.

Plaintiffs,

v.

GREGORY ALAN SKUNDA,

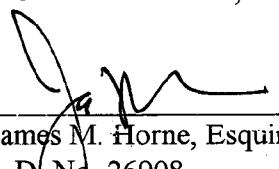
Defendant.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of our 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 29<sup>th</sup> day of January, 2002, to the attorney of record:

Jeffrey S. DuBois, 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  
Katherine V. Oliver, Esquire  
I.D. No. 77069  
Attorneys for Defendant  
811 University Drive  
State College, PA 16801  
(814) 238-4926

**FILED**

MO  
M 10 19 2002  
JAN 30 2002

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F.  
LEECH and JOELLE C. LEECH,

Plaintiffs,

v.

GREGORY ALAN SKUNDA,  
Defendant.

: No. 02-65-C.D.  
:  
:  
: TYPE OF PLEADING:  
: **ANSWER WITH NEW MATTER**  
:  
:  
:  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: McQUAIDE, BLASKO, SCHWARTZ,  
: FLEMING & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926  
: FAX#(814) 238-9624

FILED

FEB 19 2002  
m/1.59/nrc  
William A. Shaw E  
Prothonotary KEB

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02-65-C.D.  
Plaintiffs, :  
v. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

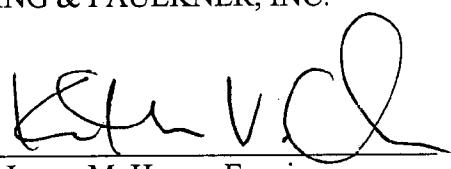
**NOTICE TO PLEAD**

TO: Karen M. Leech, individually and as parent and natural guardian of Brian F. Leech and Joelle C. Leech  
%Jeffrey S. DuBois, 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: February 15, 2002

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, :  
: No. 02-65-C.D.  
Plaintiffs, :  
: v.  
: GREGORY ALAN SKUNDA, :  
: Defendant. :  
:

**ANSWER WITH NEW MATTER OF DEFENDANT,**  
**GREGORY ALAN SKUNDA**

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

1. Upon information and belief, the allegations of paragraph 1 are admitted.
2. Upon information and belief, the allegations of paragraph 2 are admitted.
3. Upon information and belief, the allegations of paragraph 3 are admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part and denied in part. It is admitted that at about 4:20 p.m. an

accident occurred on Quarry Avenue in the City of DuBois, Clearfield County, Pennsylvania, between a motor vehicle operated by Plaintiff Karen Leech and a motor vehicle operated by Defendant Gregory Skunda. It is further admitted that said vehicles were traveling in opposite

directions at the time of the subject collision. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations of paragraph 7. The same are therefore denied and strict proof thereof demanded.

8. Denied as stated. To the contrary, it is averred that at or about the date, time and place in question, Defendant observed Plaintiffs' vehicle approaching in what he believed to be his lane of travel. It is further averred that at or about the place and location of the subject accident, there are no center lines clearly delineating the travel lanes. Defendant avers that as he observed Plaintiffs' vehicle he applied his brakes subsequent to which contact occurred between the two vehicles.

9. The allegations of paragraph 9 are denied as stated, for the reasons set forth in response to paragraph 8, all of which are incorporated herein by reference.

10. (a) - (l). The allegations of paragraphs 10(a) through (l) inclusive are denied pursuant to Pa. Rule of Civil Procedure 1029(e).

11. Defendant is advised and therefore believes that paragraph 11 pleads conclusions of law to which no response is required. To the extent any response is required, the allegations of paragraph 11 are denied and in support thereof, Defendant incorporates by reference his response to paragraph 8 above.

**COUNT ONE**  
**Karen M. Leech, Plaintiff v. Gregory Alan Skunda, Defendant**

12. Defendant incorporates herein by reference, the same as though set forth at length, his responses to paragraphs 1 through 11, inclusive.

13. - 16. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 13 through 16, inclusive.

The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Gregory Alan Skunda requests that the Complaint of Plaintiff Karen M. Leech be dismissed, with prejudice and costs of suit.

**COUNT TWO**  
**Joelle C. Leech, Plaintiff v. Gregory Alan Skunda, Defendant**

17. Defendant incorporates herein by reference, the same as though set forth at length, his responses to paragraphs 1 through 16, inclusive.

18. - 21. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 18 through 21, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Gregory Alan Skunda requests that the Complaint of Plaintiff Joelle C. Leech be dismissed, with prejudice and costs of suit.

**COUNT THREE**  
**Brian F. Leech, Plaintiff v. Gregory Alan Skunda, Defendant**

22. Defendant incorporates herein by reference, the same as though set forth at length, his responses to paragraphs 1 through 21, inclusive.

23. - 26. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 23 through 26, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Gregory Alan Skunda requests that the Complaint of Plaintiff Brian F. Leech be dismissed, with prejudice and costs of suit.

**NEW MATTER**

27. Defendant hereby asserts and raises all those defenses and/or limitations on

damages available to him by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

28. To the extent Plaintiffs were insured under a policy of insurance bearing the limited tort option, Plaintiffs' claims are barred or reduced accordingly.

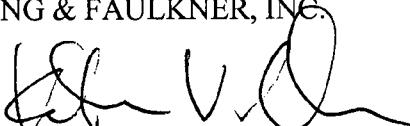
29. To the extent Plaintiffs' medical expenses, were paid or are payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

30. To the extent Plaintiff's wage loss, if any, was paid or is payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

WHEREFORE, Defendant Gregory Alan Skunda requests that Plaintiffs' Complaint be dismissed, with prejudice and costs of suit.

Respectfully submitted,

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

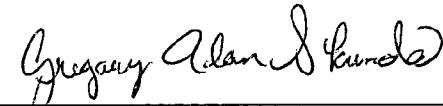
By: 

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

Dated: February 15, 2002

## **VERIFICATION**

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

  
\_\_\_\_\_  
GREGORY ALAN SKUNDA

Dated: 2 - 13 - 2002

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

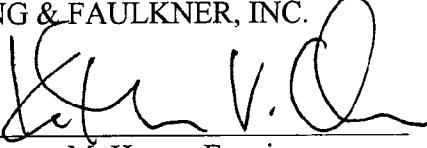
KAREN M. LEECH, individually and as : No. 02-65-C.D.  
parent and natural guardian of BRIAN F. :  
LEECH and JOELLE C. LEECH, : No. 02-65-C.D.  
Plaintiffs, :  
v. :  
GREGORY ALAN SKUNDA, :  
Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Answer with New Matter of Defendant in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 15<sup>th</sup> day of February, 2002, to the attorney of record:

Jeffrey S. DuBois, 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  
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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Defendant's Interrogatories and  
: Request for Production of  
: Documents Directed to Plaintiffs  
: (Set One)  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: DEFENDANT  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

*20* FEB 20 2002  
*20* M 234/noc  
William A. Shaw  
Prothonotary

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

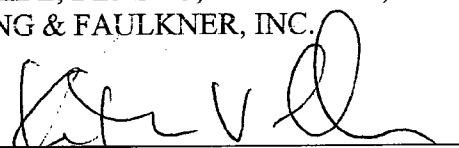
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Defendant's Interrogatories and Request for Production of Documents Directed to Plaintiffs (Set One) in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of February, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Defendant's Second Request for  
GREGORY ALAN SKUNDA, : Production of Documents and  
Defendant. : Tangible Things Directed to  
Plaintiffs

TYPE OF CASE: CIVIL

FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
THIS PARTY:

Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

FEB 20 2002  
B11234100C  
William A. Shaw  
Prothonotary

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

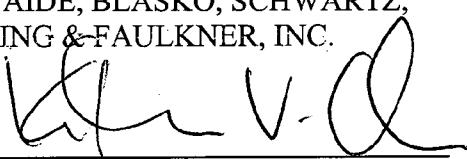
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Defendant's Second Request For Production of Documents and Tangible Things Directed to Plaintiffs in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 18<sup>th</sup> day of February, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
I.D. No. 77069  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Notice of Intent to Serve Subpoenas  
: to Produce Documents and Things  
: for Discovery Pursuant to Rule  
: 4009.21  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: DEFENDANT  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

FILED

FEB 26 2002  
02/26/02 cc  
William A. Shaw  
Prothonotary



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

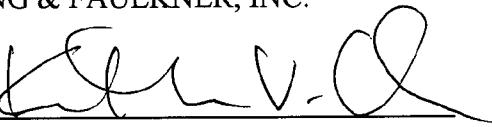
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 25<sup>th</sup> day of February, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually  
and as parent and natural  
guardian of BRIAN F. LEECH and  
JOELLE C. LEECH,  
Plaintiffs

vs.

GREGORY ALAN SKUNDA,  
Defendant

No. 02-0065, C.D.

Type of Pleading:

**REPLY TO NEW  
MATTER**

Filed on behalf of:  
PLAINTIFFS

Counsel of Record for  
This Party:

Jeffrey S. DuBois  
Supreme Court No. 62074  
Hanak, Guido and Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

**FILED**

MAR 08 2002

million  
William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually :  
and as parent and natural :  
guardian of BRIAN F. LEECH and :  
JOELLE C. LEECH, :  
Plaintiffs :  
vs. :  
No. 02-0065, C.D.  
GREGORY ALAN SKUNDA, :  
Defendant :  
.

**REPLY TO NEW MATTER**

AND NOW, comes the Plaintiffs, KAREN M. LEECH, BRIAN F. LEECH and JOELLE C. LEECH, by and through their attorneys, HANAK, GUIDO AND TALADAY, and files this Reply to New Matter as follows:

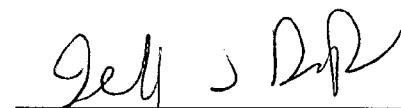
27. Paragraph 27 represents conclusions of law to which no responsive pleading is required.

28. Paragraph 28 represents conclusions of law to which no responsive pleading is required.

29. Paragraph 29 represents conclusions of law to which no responsive pleading is required.

30. Paragraph 30 represents conclusions of law to which no responsive pleading is required.

WHEREFORE, the Plaintiffs request this Honorable Court to award judgment in their favor and against the Defendant together with costs of suit and any other relief this Court deems just and equitable.



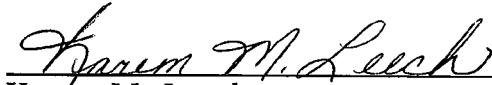
---

Jeffrey S. DuBois  
Attorney for Plaintiffs

**VERIFICATION**

I, KAREN M. LEECH, individually and as parent and natural guardian of Brian F. Leech and Joelle C. Leech, verify that the statements in the foregoing Reply to New Matter are true and correct to the best of my knowledge, information and belief.

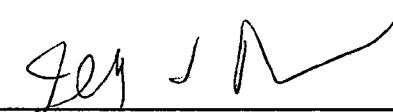
This statement and verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

  
\_\_\_\_\_  
Karen M. Leech

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 7th day of March, 2002, I mailed a copy of the within Reply to New Matter by first class mail, postage prepaid, to:

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

  
\_\_\_\_\_  
Jeffrey S. DuBois

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH,

..... No. 02 - 65- C.D.

..... Plaintiffs,

..... TYPE OF PLEADING:  
Certificate Prerequisite

..... vs.

GREGORY ALAN SKUNDA,

..... Defendant.

..... TYPE OF CASE: CIVIL

..... FILED ON BEHALF OF:  
**DEFENDANT**

..... COUNSEL OF RECORD FOR  
THIS PARTY:

..... Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

MAR 1 0 2002

10/2351 no/c  
William A. Shaw  
Prothonotary

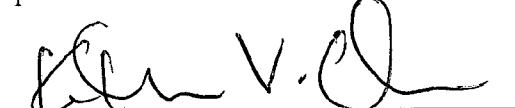
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

KAREN M. LEECH, individually and as  
parent and legal guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
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 Subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least 20 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) no objection to the subpoenas have been received; 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.



Katherine V. Oliver  
Attorney for Defendant  
GREGORY ALAN SKUNDA

Dated: March 18, 2002

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

KAREN M. LEECH, individually and as  
parent and legal guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65-C.D.

Plaintiffs,

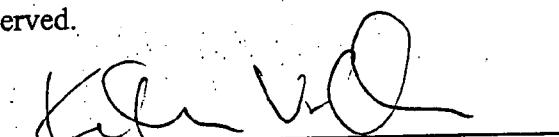
vs.

GREGORY ALAN SKUNDA,

Defendant.

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

Defendant, GREGORY ALAN SKUNDA, intends to serve subpoenas identical to the ones that are 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 any objections to the subpoenas. If no objections are made, the subpoenas may be served.



Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: February 25, 2002

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

\*

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

TO: DuBois EMS Ambulance Service  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

Deputy

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

*DuBois EMS Ambulance Service*

**DOCUMENTS TO BE PRODUCED**

Any and all ambulance records, **for as long as you retain same**, on Karen Leech (date of birth: April 4, 1969; social security number 270-68-2742), including but not limited to, trip sheets, history/physical examination, reports, treatment records, rescue efforts (if any), etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

Gregory Alan Skunda  
Defendant(s)

\*

No. 2002-00065-CD

\*

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

TO: DuBois EMS Ambulance Service

(Name of Person or Entity)

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see attached

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(Address)

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive  
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

Deputy

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

*DuBois EMS Ambulance Service*

**DOCUMENTS TO BE PRODUCED**

Any and all ambulance records, **for as long as you retain same**, on Brian F.. Leech (date of birth: August 4, 1993), including but not limited to, trip sheets, history/physical examination, reports, treatment records, rescue efforts (if any), etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

\*

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

TO: DuBois EMS Ambulance Service

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:  
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McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
Deputy

DATE: Wednesday, February 20, 2002  
Seal of the Court

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

DuBois EMS Ambulance Service

**DOCUMENTS TO BE PRODUCED**

Any and all ambulance records, **for as long as you retain same**, on Joelle C.. Leech (date of birth: February 2, 1986; social security number 195-66-5870), including but not limited to, trip sheets, history/physical examination, reports, treatment records, rescue efforts (if any), etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

\*

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

TO: DuBois Regional Medical Center  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
Deputy

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

DATE: Wednesday, February 20, 2002  
Seal of the Court

*DuBois Regional Medical Center*

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Brian F. Leech (date of birth: August 4, 1993), including but not limited to, patient questionnaires, emergency room records, ambulance records, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/ occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Brian's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

Gregory Alan Skunda  
Defendant(s)

\*

No. 2002-00065-CD

\*

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

TO: DuBois Regional Medical Center

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

William A. Shaw  
Deputy

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

DuBois Regional Medical Center

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Joelle C. Leech (date of birth: February 2, 1986; social security number 195-66-5870), including but not limited to, patient questionnaires, emergency room records, ambulance records, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Joelle's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

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

TO: DuBois Regional Medical Center  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:  
see attached

McQuaide Blasko Law Offices, 811 University Drie, State College, PA 16801  
(Address)

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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 order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive  
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
Deputy

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

DATE: Wednesday, February 20, 2002  
Seal of the Court

DuBois Regional Medical Center

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Karen Leech (date of birth: April 4, 1969; social security number 270-68-2742), including but not limited to, patient questionnaires, emergency room records, ambulance records, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Brian's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech

Joelle C. Leech

Brian F. Leech

Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

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

TO: George M. Fatula, M.D. & Associates, Ltd.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive  
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

William A. Shaw  
Deputy

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

George M. Fatula, M.D. & Associates, Ltd.

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Joelle C. Leech (date of birth: February 2, 1986; social security number 195-66-5870), including but not limited to, patient questionnaires, emergency room records, ambulance records, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Joelle's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

Gregory Alan Skunda  
Defendant(s)

\*

No. 2002-00065-CD

\*

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

TO: George M. Fatula, M.D. & Associates, Ltd.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive  
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
Deputy

DATE: Wednesday, February 20, 2002  
Seal of the Court

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

George M. Fatula, M.D. & Associates, Ltd.

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Karen Leech (date of birth: April 28, 1969; social security number 270-68-2742), including but not limited to, patient questionnaires, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/ occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Karen's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

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

TO: James K. Fugate, Jr., M.D./George M. Fatula, M.D. & Associates, Ltd.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

ME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

Deputy

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

James K. Fugate, Jr., M.D./George M. Fatula, M.D. & Associates, Ltd.

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Brian F. Leech (date of birth: August 4, 1993), including but not limited to, patient questionnaires, history/physical examination, discharge notes/summaries, operative reports, consultation reports, laboratory test results, pathology reports, x-ray/MRI/CT scan reports, electrodiagnostic studies, physical/occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Brian's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

Gregory Alan Skunda  
Defendant(s)

\*

No. 2002-00065-CD

\*

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

TO: William A. Guy H. Gerhart, M.D.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

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McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

William A. Shaw  
Deputy

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

Guy H. Gerhart, M.D.

**DOCUMENTS TO BE PRODUCED**

Any and all ambulance records, **for as long as you retain same**, on Karen Leech (date of birth: April 4, 1969; social security number 270-68-2742), including but not limited to, history/physical examination, office progress notes, consultation reports, operative reports, pathology reports, laboratory test results, x-ray/MRI/CT scan reports, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes, any and all correspondence (regardless of source) pertaining to Karen's health status, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

\*

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

TO: Michael A. Inzana, D.M.D.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:  
see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

William A. Shaw  
Deputy

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

DATE: Wednesday, February 20, 2002  
Seal of the Court

Michael A. Inzana, D.M.D.

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Karen Leech (date of birth: April 28, 1969; social security number 270-68-2742), including but not limited to, patient questionnaires, history/physical examination, oral examinations, x-ray reports, consultation reports, prognosis for future care and treatment, treatment records, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs:

Gregory Alan Skunda  
Defendant(s)

\*

\*

No. 2002-00065-CD

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

TO: Michael A. Inzana, D.M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

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

NAME: Katherine V. Oliver, Esquire

ADDRESS: 811 University Drive  
State College, PA 16801

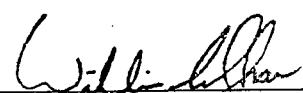
TELEPHONE: 814-238-4926

SUPREME COURT ID # 77069

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
\_\_\_\_\_  
Deputy

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

DATE: Wednesday, February 20, 2002

Seal of the Court

Michael A. Inzana, D.M.D.

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Brian F. Leech (date of birth: August 4, 1993), including but not limited to, patient questionnaires, history/physical examination, oral examinations, x-ray reports, consultation reports, prognosis for future care and treatment, treatment records, etc.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

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

TO: Dr. G. M. Yount

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:  
see attached

McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive  
State College, PA 16801  
TELEPHONE: 814-238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

Deputy

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

DATE: Wednesday, February 20, 2002  
Seal of the Court

Dr. G. M. Yount

**DOCUMENTS TO BE PRODUCED**

Any and all medical records, **for as long as you retain same**, on Karen Leech (date of birth: April 28, 1969; social security number 270-68-2742), including but not limited to, patient questionnaires, history/physical examination, oral examinations, x-ray reports, consultation reports, prognosis for future care and treatment, treatment records, etc.

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Subpoena to Produce Documents and  
: Things Directed to George M.  
: Fatula, M.D. & Associates, Ltd.  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

01289100  
William A. Shaw  
Prothonotary

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

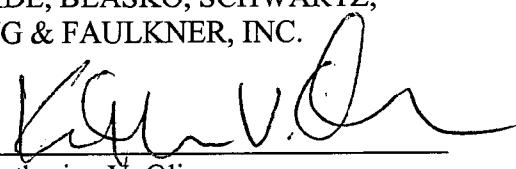
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to George M. Fatula, M.D. & Associates, Ltd. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Subpoena to Produce Documents and Things Directed to James K. Fugate, Jr., M.D./George M. Fatula, M.D. & Associates, Ltd.  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
**DEFENDANT**  
: COUNSEL OF RECORD FOR THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

*W.A. Shaw*  
B  
William A. Shaw  
Prothonotary

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

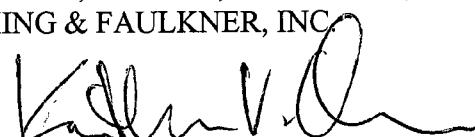
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

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Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH,

No. 02 - 65- C.D.

Plaintiffs,

TYPE OF PLEADING:  
Subpoena to Produce Documents and  
Things Directed to Guy H. Gerhart,  
M.D.

vs.

GREGORY ALAN SKUNDA,

Defendant.

TYPE OF CASE: CIVIL

FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
THIS PARTY:

Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

MAR 19 2002

01238110CC

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

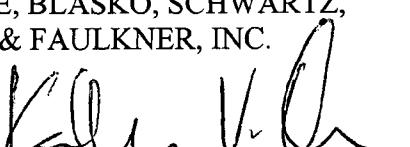
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to Guy H. Gerhart, M.D. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

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

  
Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and  
: Things Directed to Michael A.  
: Inzana, D.M.D.

GREGORY ALAN SKUNDA, :  
Defendant. : TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: DEFENDANT  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

01238/noc

*BS*  
William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to Michael A. Inzana, D.M.D. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: Katherine V. Oliver

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and Things Directed to Michael A. Inzana, D.M.D.

GREGORY ALAN SKUNDA, :  
Defendant. : TYPE OF CASE: CIVIL

FILED ON BEHALF OF:  
**DEFENDANT** :  
COUNSEL OF RECORD FOR THIS PARTY:  
Katherine V. Oliver, Esquire Supreme Court I.D. No. 77069 McQuaide, Blasko, Schwartz, Fleming & Faulkner, Inc. 811 University Drive State College, PA 16801 (814) 238-4926 Fax: (814) 238-9624

**FILED**

MAR 19 2002

012381 NO CC

William A. Shaw  
Prothonotary

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

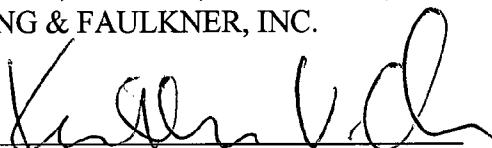
KAREN M. LEECH, individually and as  
parent and legal guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to  
Michael A. Inzana, D.M.D. in the above-captioned matter was mailed by regular mail, postage  
prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the  
attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and Things Directed to Dr. G. M. Yount

GREGORY ALAN SKUNDA, :  
Defendant. : TYPE OF CASE: CIVIL

FILED ON BEHALF OF:  
**DEFENDANT** :  
COUNSEL OF RECORD FOR THIS PARTY:  
Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

MAR 19 2002  
01238120cc  
William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

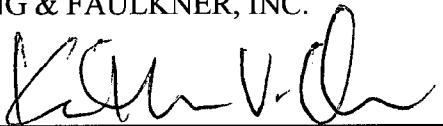
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to Dr. G. M. Yount in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

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

  
Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and Things Directed to DuBois Regional Medical Center  
GREGORY ALAN SKUNDA, :  
Defendant. : TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
: COUNSEL OF RECORD FOR THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

b6/03/02: ncc  
William A. Shaw  
Prothonotary

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

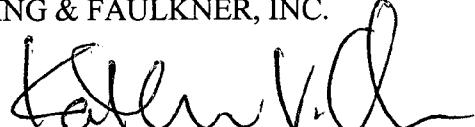
KAREN M. LEECH, individually and as  
parent and legal guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to  
DuBois Regional Medical Center in the above-captioned matter was mailed by regular mail,  
postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002,  
to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and  
: Things Directed to DuBois  
: Regional Medical Center

GREGORY ALAN SKUNDA, :  
: TYPE OF CASE: CIVIL

Defendant. : FILED ON BEHALF OF:  
: DEFENDANT

: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

WAS  
William A. Shaw  
Prothonotary

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

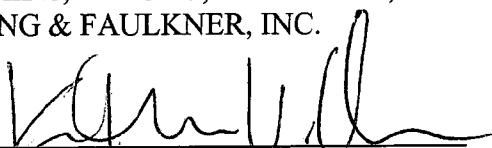
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
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Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and  
: Things Directed to DuBois  
: Regional Medical Center

GREGORY ALAN SKUNDA, :  
: TYPE OF CASE: CIVIL

Defendant. : FILED ON BEHALF OF:  
: DEFENDANT

: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

01/24/02  
William A. Shaw  
Prothonotary

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

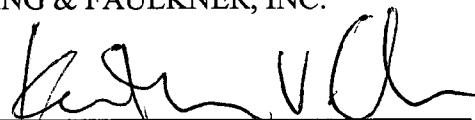
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

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Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and  
GREGORY ALAN SKUNDA, : Things Directed to George M.  
Defendant. : Fatula, M.D. & Associates, Ltd.

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
DEFENDANT  
COUNSEL OF RECORD FOR  
THIS PARTY:  
Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

MAR 19 2002

sb  
01/29/2002  
William A. Shaw  
Prothonotary

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

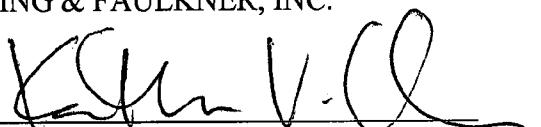
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to George M. Fatula, M.D. & Associates, Ltd. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as parent and natural guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Subpoena to Produce Documents and  
: Things Directed to DuBois EMS  
: Ambulance Service  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002

012431ncc

W.A.S. William A. Shaw  
Prothonotary

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

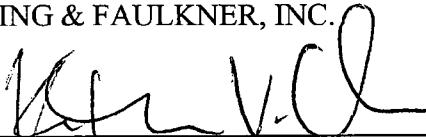
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Subpoena Duces Tecum Directed to DuBois EMS Ambulance Service in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 18<sup>th</sup> day of March, 2002, to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
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McQUAIDE, BLASKO, SCHWARTZ,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.

Plaintiffs, : TYPE OF PLEADING:  
vs. : Subpoena to Produce Documents and  
: Things Directed to DuBois EMS  
: Ambulance Service

GREGORY ALAN SKUNDA, :  
Defendant. : TYPE OF CASE: CIVIL

FILED ON BEHALF OF:  
**DEFENDANT** :  
COUNSEL OF RECORD FOR  
THIS PARTY:  
Katherine V. Oliver, Esquire  
Supreme Court I.D. No. 77069  
McQuaide, Blasko, Schwartz,  
Fleming & Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

MAR 10 2002

03/10/02  
William A. Shaw  
Prothonotary

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

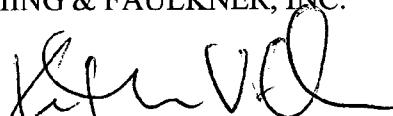
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
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498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually and as  
parent and natural guardian of BRIAN F. LEECH  
and JOELLE C. LEECH, : No. 02 - 65- C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
: TYPE OF PLEADING:  
: Subpoena to Produce Documents and  
: Things Directed to DuBois EMS  
: Ambulance Service  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
: COUNSEL OF RECORD FOR  
: THIS PARTY:  
: Katherine V. Oliver, Esquire  
: Supreme Court I.D. No. 77069  
: McQuaide, Blasko, Schwartz,  
: Fleming & Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624

**FILED**

MAR 19 2002  
012451 NOC  
William A. Shaw  
Prothonotary

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

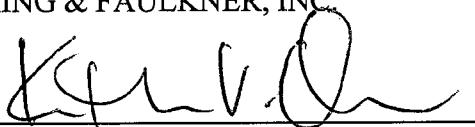
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :  
:

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Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11972

LEECH, KAREN M., ind & as parent & natural guardian

02-65-CD

VS.

SKUNDA, GREGORY ALAN

COMPLAINT

**SHERIFF RETURNS**

NOW JANUARY 23, 2002 AT 1:22 PM EST SERVED THE WITHIN COMPLAINT  
ON GREGORY ALAN SKUNDA, DEFENDANT AT RESIDENCE, 122 W. 2ND AVE.,  
DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO GREGORY  
ALAN SKUNDA A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT  
AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

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

**FILED**

MAR 25 2002

10:30 am  
William A. Shaw  
Prothonotary

Sworn to Before Me This

So Answers,

25th Day Of March 2002  
Jacqueline Kendrick  
Deputy Prothonotary  
My Commission Expires  
1st Monday in Jan.  
Clearfield Co., Clearfield

*Chester A. Hawkins*  
Chester A. Hawkins  
Sheriff

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

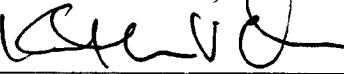
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, Plaintiffs, vs. GREGORY ALAN SKUNDA, Defendant.

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

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

- (1) Notice of Intent to Serve the Subpoena with a copy of the subpoena attached thereto was waived by Plaintiff's counsel. A copy of the confirmation letter is attached;
- (2) a copy of the proposed subpoena, is attached to this Certificate; and
- (3) the subpoena which will be served is identical to the subpoena which is attached.

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-492  
Fax: (814) 238-9624

DATE:

**FILED**

11/29/03  
FCB 11/2003 NO  
CC

William A. Shaw  
Prothonotary



# HANAK, GUIDO and TALADAY

## Attorneys at Law

Robert M. Hanak  
Anthony S. Guido  
Matthew B. Taladay

Telephone: (814) 371-7768  
Fax: (814) 371-1974

498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

Nicole Hanak Bankovich  
Jeffrey S. DuBois  
S. Casey Bowers

February 5, 2003

Katherine V. Oliver, Esq.  
McQuaide Blasko  
811 University Drive  
State College, PA 16801

Re: Leech v. Skunda

Dear Katherine:

Please be advised that this letter serves as a waiver of the 20 day rule in which to inspect any medical records of Dr. Varga before the deposition which is to be held on Monday, February 19, 2003.

As I also requested, please provide me with copies of the medical records/reports that you receive for my inspection.

Thank you for your attention to this matter.

Sincerely,



Jeffrey S. DuBois

JSD/bab  
cc: Karen Leech

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Karen M. Leech  
Joelle C. Leech  
Brian F. Leech  
Plaintiff(s)

Vs.

\*

No. 2002-00065-CD

Gregory Alan Skunda  
Defendant(s)

\*

\*

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

TO: RAJIV R. VARMA, M.D., RAJIV R. VARMA, M.D. & ASSOCIATES  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:  
SEE ATTACHED SHEET.

811 UNIVERSITY DRIVE, STATE COLLEGE PA 16801  
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: KATHERINE V. OLIVER, ESQUIRE  
ADDRESS: 811 UNIVERSITY DRIVE  
STATE COLLEGE, PA 16801  
TELEPHONE: (814) 238-4926  
SUPREME COURT ID # 77069  
ATTORNEY FOR: DEFENDANT

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

DATE: Thursday, February 06, 2003

Seal of the Court

  
Deputy

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

Rajiv R. Varma, M.D.

Rajiv R. Varma, M.D. & Associates

**DOCUMENTS TO BE PRODUCED**

Any and all medical records for as long as you retain same and regardless of treating physician on Joelle Leech, (SS# 195-66-5870; DOB: February 2, 1986), including but not limited to, patient questionnaire regarding medical history, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Joelle Leech's health status (regardless of source), etc.

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

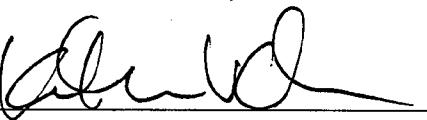
KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, Plaintiffs, vs. GREGORY ALAN SKUNDA, Defendant.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of A Subpoena Directed to Rajiv R. Varma, M.D., Rajiv R. Varma, M.D. & Associates in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 10<sup>th</sup> day of January, 2003 to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
Hanak, Guido & Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

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

By: 

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

KAREN M. LEECH, individually  
and as parent and natural  
guardian of BRIAN F. LEECH and  
JOELLE C. LEECH,  
Plaintiffs

vs.

GREGORY ALAN SKUNDA,  
Defendant

No. 02-0065, C.D.

Type of Pleading:

**PETITION FOR APPROVAL  
OF SETTLEMENT**

Filed on behalf of:  
**PLAINTIFFS**

Counsel of Record for  
This Party:

Jeffrey S. DuBois  
Supreme Court No. 62074  
Hanak, Guido and Taladay  
498 Jeffers Street  
PO Box 487  
DuBois, PA 15801

**FILED**

JUL 10 2003

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually :  
and as parent and natural :  
guardian of BRIAN F. LEECH and :  
JOELLE C. LEECH, :  
Plaintiffs :  
vs. :  
No. 02-0065, C.D.  
GREGORY ALAN SKUNDA, :  
Defendant :  
.

**PETITION FOR APPROVAL OF SETTLEMENT**

AND NOW, comes the Plaintiffs, JOELLE C. LEECH, a minor, by  
her parents, BRIAN R. LEECH and KAREN M. LEECH, and hereby  
Petitions your Honorable Court as follows:

1. JOELLE C. LEECH, is a 17 year old minor, born on February 2, 1986, and who resides at 200 Main Street, Falls Creek, Jefferson County, Pennsylvania, 15840.
2. On February 6, 2000, JOELLE C. LEECH was injured when a vehicle operated by Gregory Skunda struck the vehicle she was traveling in with her mother, on Quarry Avenue, in DuBois, Clearfield County, Pennsylvania.
3. The injuries sustained by JOELLE C. LEECH included the following:
  - (a) Trauma to the face and head region;
  - (b) Migraines;
  - (c) Multiple lacerations;

- (d) Embedded glass fragments in her forehead;
- (e) General bruising and contusions.

4. JOELLE C. LEECH has received medical treatment for her injuries, underwent examinations and testings, in both DuBois, Pennsylvania, and Pittsburgh, Pennsylvania.

5. A lawsuit, filed on behalf of her mother, KAREN M. LEECH, was filed at the above captioned term and number.

6. The undersigned counsel on behalf of JOELLE C. LEECH and counsel for Defendant have agreed to a high/low arbitration with respect to the claims of JOELLE C. LEECH.

7. Pursuant to the terms of the high/low arbitration agreement, JOELLE C. LEECH'S claim will be compromised and settled for no less than Four Thousand and 00/100 (\$4,000.00) Dollars and no more than Twenty-five Thousand and 00/100 (\$25,000.00) Dollars, the precise amount to be determined after hearing by an arbitration panel comprised of three (3) attorneys.

8. After the arbitration panel has independently determined the amount to be awarded for JOELLE C. LEECH'S claim, the amount will be molded, if necessary, to the high/low parameters agreed upon by the parties as set forth in paragraph 7 above.

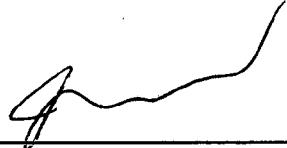
9. As part of the consummation of settlement and following the arbitrators' award, a release will be executed on behalf of JOELLE C. LEECH, releasing any and all claims against Defendant, Gregory Alan Skunda, in consideration of the amount of the arbitration award. A copy of the proposed release is attached hereto as Exhibit "A".

10. Said arbitration for JOELLE C. LEECH is tentatively scheduled for the spring of this year.

11. The parents of the minor child, JOELLE C. LEECH, believe that the aforementioned arbitration is in the best interest of JOELLE C. LEECH.

WHEREFORE, Petitioners pray your Honorable Court to approve the compromise arbitration as set forth herein and further request that the Petitioners be authorized and empowered to proceed with the arbitration.

Respectfully submitted,



\_\_\_\_\_  
Jeffrey S. DuBois  
Attorney for Petitioners

**VERIFICATION**

We, BRIAN R. LEECH and, KAREN M. LEECH, as parent and natural guardian of JOELLE C. LEECH, verify that the statements in the foregoing Petition are true and correct to the best of their knowledge, information and belief.

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

Brian R. Leech  
Brian R. Leech

Karen M. Leech  
Karen M. Leech

# RELEASE

For the sole consideration of \_\_\_\_\_ and 00/100 (\$ \_\_\_\_\_.00) Dollars the receipt and sufficiency whereof is hereby acknowledged, the undersigned hereby releases and forever discharges **Gregory Alan Skunda and State Farm Mutual Insurance Companies**, their heirs, executors, administrators, agents and assigns, and all other persons, firms or corporations liable or, who might be claimed to be liable, none of whom admit any liability to the undersigned but all expressly deny any liability, from any and all claims, demands, damages, actions, causes of action or suits of any kind or nature whatsoever, and particularly on account of all injuries, known and unknown, both to person and property, which have resulted or may in the future develop from an accident which occurred on or about the 6<sup>th</sup> day of February, 2000 (year) at or near **Quarry Avenue and Robinson Street, DuBois, Clearfield County, Pennsylvania**.

Undersigned hereby declares that the terms of this settlement have been completely read and are fully understood and voluntarily accepted for the purpose of making a full and final compromise adjustment and settlement of any and all claims, disputed or otherwise, on account of the injuries and damages above mentioned, and for the express purpose of precluding forever any further or additional claims arising out of the aforesaid accident.

This release expressly reserves all rights of the parties released to pursue their legal remedies, if any, against the undersigned, their heirs, executors, agents and assigns.

Undersigned hereby accepts draft or drafts as final payment of the consideration set forth above.

**Any person who knowingly and with intent to injure or defraud any insurance company or other person files an application or a statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties.**

IN WITNESS WHEREOF, \_\_\_\_\_ have hereunto set my hand and seal this \_\_\_\_\_ day of \_\_\_\_\_, 2003.

In presence of:

\_\_\_\_\_  
Witness  
\_\_\_\_\_  
Signed: \_\_\_\_\_  
KAREN M. LEECH, INDIVIDUALLY, AND AS  
PARENT AND NATURAL GUARDIAN OF  
JOELLE C. LEECH, A MINOR

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 10<sup>th</sup> day of ~~April~~ July, 2003, I mailed a copy of the within Petition for Approval of Settlement by first class mail, postage prepaid, to:

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



---

Jeffrey S. DuBois

FILED

cc

01/20/51 *ed*  
JUL 10 2003

Atty Dubois

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually :  
and as parent and natural :  
guardian of BRIAN F. LEECH and :  
JOELLE C. LEECH, :  
Plaintiffs :  
vs. :  
No. 02-0065, C.D.  
GREGORY ALAN SKUNDA, :  
Defendant :  
vs.

**ORDER OF COURT**

AND NOW, this 10<sup>th</sup> day of July, 2003, upon  
consideration of the within Petition for Approval of Settlement,

IT IS HEREBY ORDERED AND DECREED that the said  
Petition for Approval of Settlement is GRANTED.

*according to the attached judgment.*

BY THE COURT:



P.J.

**FILED**

JUL 10 2003

William A. Shaw  
Prothonotary

FILED

07/10/03  
JUL 10 2003

cc  
Amy Dubois  
EJ

William A. Shaw  
Prothonotary

PO Box 549  
Clearfield, PA 16830  
Phone: 814-765-2641, Ext. 1330  
Fax: 814-765-7659

**Clearfield County  
Courthouse**

# Fax

*Kelkyn Oliver Eng*

**To:** Linda **From:** William A. Shaw

**Fax:** 238-9624 **Date:**

**Phone:**  **Pages:** 1 + cover

**Re:**  **CC:**

**Urgent**  **For Review**  **Please Comment**  **Please Reply**  **Please Recycle**

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**Comments:**

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

KAREN M. LEECH, individually :  
and as parent and natural :  
guardian of BRIAN F. LEECH and :  
JOELLE C. LEECH, :  
Plaintiffs :  
vs. :  
No. 02-0065, C.D.  
GREGORY ALAN SKUNDA, :  
Defendant :  
vs.

**ORDER OF COURT**

AND NOW, this 10<sup>th</sup> day of July, 2003, upon  
consideration of the within Petition for Approval of Settlement,

IT IS HEREBY ORDERED AND DECREED that the said  
Petition for Approval of Settlement is GRANTED.

*according to the attached petition*

BY THE COURT:

( /s/ JOHN K. REILLY, JR. .J.  
President Judge

**FILED**

JUL 10 2003

William A. Shaw  
Prothonotary

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

KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.

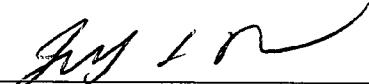
Plaintiffs, :  
vs. :  
:

GREGORY ALAN SKUNDA, :  
Defendant. :  
:

**PRAECIPE TO DISCONTINUE**

TO: THE PROTHONOTARY

Please mark all claims in the above entitled matter as SETTLED, ENDED, AND DISCONTINUED, with prejudice, in accordance with the Court's Order of July 10, 2003.

  
\_\_\_\_\_  
Jeffrey S. DuBois  
190 West Park Avenue Suite 5  
DuBois, PA 15801

DATED:

**FILED**

AUG 20 2003

William A. Shaw  
Prothonotary

Recd 7/25/03  
Dr

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

KAREN M. LEECH, individually and as parent and legal guardian of BRIAN F. LEECH and JOELLE C. LEECH, : No. 02 - 65-C.D.  
Plaintiffs, :  
vs. :  
GREGORY ALAN SKUNDA, :  
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Praeclipe to Discontinue in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 19<sup>th</sup> day of August, 2003 to the attorney(s) of record:

Jeffrey S. DuBois, Esquire  
190 West Park Avenue Suite 5  
DuBois, PA 15801

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

By: Katherine V. Oliver

Katherine V. Oliver  
Attorneys for Defendant  
GREGORY ALAN SKUNDA  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

**FILED**

*PSA*  
in 1:49 CR, Cuthbertson & others  
AUG 20 2003

William A. Shaw  
Prothonotary