

02-100-CD
SAGE & ASSOCIATES -vs- BAYER CLOTHING GROUP, INC.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SAGE & ASSOCIATES

Plaintiff(s)

No. 02-100-CO

vs.

BAYER CLOTHING GROUP, INC., formerly
known as KENT SPORTSWEAR, INC.

Defendant(s)

COMPLAINT

FILED ON BEHALF OF
Plaintiff(s)

COUNSEL OF RECORD OF
THIS PARTY:

NICHOLAS D. KRAWEC, ESQUIRE
PA I.D. #38527
JON A. MCKECHNIE, ESQUIRE
PA I.D. #36268
Bernstein Law Firm, P.C.
Firm #718
1133 Penn Avenue
Pittsburgh, PA 15222
412-456-8100

DIRECT DIAL: (412) 456-8114

BERNSTEIN FILE NO. C0010224

FILED

JAN 21 2002

William A. Shaw
Prothonotary

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

Plaintiff

vs.

Civil Action No.

BAYER CLOTHING GROUP, INC.,
formerly known as KENT SPORTSWEAR, INC.

Defendant

NOTICE AND COMPLAINT

NOTICE TO DEFEND

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 upon you, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a Judgment may be entered against you by the Court, without further notice, for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

LAWYER REFERRAL SERVICE
PA BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108

COMPLAINT

1. Plaintiff is a corporation having offices in P.O. Box 6032, Jensen Beach, FL 34957.
2. Defendant is a corporation having its offices and place of business at RR 4, Box 91B, Clearfield, Clearfield County, Pennsylvania 16830.
3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant certain Consulting Services, as is more specifically shown by Plaintiff's invoices, copies of which are attached hereto, marked Exhibit "1" collectively, and made a part hereof.
4. Defendant received and accepted the aforementioned services.
5. The prices charged by Plaintiff were the fair, reasonable, and market prices that prevailed at the times of the transactions.
6. The prices charged by Plaintiff were the prices that Defendant agreed to pay.
7. Plaintiff avers that the balance due amounts to \$11,000.00.
8. Plaintiff claims legal interest as damages on the liquidated debt from August 20, 2001.
9. Plaintiff avers that interest amounts to \$220.00 to December 20, 2001.

10. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and refused to pay the aforesaid balance, interest, or any part thereof to Plaintiff.

WHEREFORE, Plaintiff demands Judgment against Defendant in the amount of \$11,220.00, with continuing interest thereon at the rate of 1/2% per month and costs.

BERNSTEIN LAW FIRM, P.C.

BY:



Attorney for Plaintiff(s)

1133 Penn Avenue

Pittsburgh, PA 15222

BERNSTEIN FILE NO. C0010224

(412) 456-8100

INVOICE FOR: CONSULTING SERVICES

Invoice No 1161Date Submitted 2/1/2000

ALVIN G. GONSALVES

~~P.O. Box 333
Destin, Florida 32541~~~~P.O. Box 870629
Stone Mountain, Georgia 30087~~Period Covered - 1/14/2000 - 1/31/2000\$ 7,750.00Consulting Fees - 4 1/2 Days, plus retainer\$ 580.00

Expenses Not Paid Directly By Client:

\$ 8,330.00

Total For Period-

*All invoices are due when received.

Client Bayer Clothing Grp. Sent To: P. Looey

Rec'd by

Date

Amount

Payment Received _____

+ \$0.00 = \$8,330.00

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

EXHIBIT 1

Alvin G Gonsalves

(561) 334-7774

p. 15

expenses 1200 for + 1100 today See today letter - 1400 for

INVOICE FOR: CONSULTING SERVICES

Invoice No 1174

Date Submitted March 18 2000

ALVIN G. GONSALVES

P.O. Box 8333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Feb 1-28-2000

Consulting Fees - Retainer, plus 4 hrs.
Consulting, (\$1250 + \$50)
in Southwick

\$ 1800

Expenses Not Paid Directly By Client:

\$ _____

Total For Period-

1800⁰⁰

*All invoices are due when received.

Client Payer Clothes Sent To: P. Looby

	Date	Amount
Payment Received	4/2/16	\$11

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1179Date Submitted 4/3/00

ALVIN G. GONSALVES

Remit toP.O. Box 333
Destin, Florida 32541 P.O. Box 870629
Stone Mountain, Georgia 30087 Period Covered - March 1-31, 00
Consulting Fees (Retainer)\$ 1250.00Expenses Not Paid Directly By Client: \$

P.S.

I have not received
payment for Feb yet. Please
Total For Period 1/31/00 1250.00
check my voice # 1179

All invoices are due when received.

Client Bayer Clothing Sent To: P. Lropy

AL

Date 4/3/00 Amount 1250.00
Payment Received

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1134Date Submitted 5/1/00

ALVIN G. GONSALVES

Remit to ~~P.O. Box 833
Destin, Florida 32541~~ ~~P.O. Box 870629
Stone Mountain, Georgia 30087~~ Period Covered 4/1/00 Thru 5/1/00 \$ 3,450⁰⁰Consulting Fees - Retainer plus meetings, calls
to set up potential contracting by Southwick
for "Custom cut" special order. (Samples "in work"
need expediting - \$100 - 200/wk or more) 2 1/2 yrExpenses Not Paid Directly By Client: = \$1,250 + \$2,000 \$ —Total For Period- \$ 3,450⁰⁰

*All invoices are due when received.

Client Bayer Clothing Co Sent To: Phil Looby

Date

Amount

Payment Received 1/1\$1,000

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1182Date Submitted 7/3/00 July 3, 2000

ALVIN G. GONSALVES

Remit to

P.O. Box 833

Destin, Florida 32541

P.O. Box 870629

Stone Mountain, Georgia 30087 Period Covered - June 1st Thru 30th, '00\$ 4,550.00Consulting Fees Monthly retainer plus 3 days
quarterly for followup Southwick
+ consulting

Expenses Not Paid Directly By Client:

\$ —Total For Period (ending 2nd Quarterly)\$ 4,550.00

*All invoices are due when received.

Client Bayer Clothing Co. Sent To: P. LoobyDate 7/30/00 Amount FullPayment Received 7/30/00

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

12.50 for monthly
+ 3 days basic fee for quarter + 15% ad
= 12.50 + 3.75 + 1.875 = \$17.125

INVOICE FOR: CONSULTING SERVICES

Invoice No 1188

Date Submitted 8/1/80

ALVIN G. GONSALVES

P.O. Box 333

Destin, Florida 32541

P.O. Box 870629

Stone Mountain, Georgia 30087

Period Covered - 7/1-00 - 8/1/80

\$ 1250 ⁰⁰

Consulting Fees - Retainer

Expenses Not Paid Directly By Client:

\$ -

Total For Period-

\$ 1250 ⁰⁰

*All invoices are due when received.

Client Boyer Clothing Group Sent To: Phil Lanby

	Date	Amount
Payment Received	8/2/	1250

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1197

Date Submitted 9/5/00

ALVIN G. GONSALVES

Remit ToP.O. Box 333
Destin, Florida 32541 P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Aug 1, '00 Thru 8/31/00

\$ 1,250 ⁰⁰Consulting Fees - 1/2 (Retainer)

Expenses Not Paid Directly By Client:

\$ _____

Total For Period-

\$ 1,250 ⁰⁰

*All invoices are due when received.

Client Bayer Clothing Grp. Sent To: Mr. Phil Looby

Payment Received	Date	Amount
<u>9/5/00</u>		<u>1/2</u>

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

0.58. 40

N/A
1/2
4/2
4/2

INVOICE FOR: CONSULTING SERVICES

Invoice No 1199

Date Submitted 10/2/00

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541 P.O. Box 870629
Stone Mountain, Georgia 30087 Period Covered - 9/1/00 thru 9/30/00 \$ 6750.00Consulting Fees - monthly Retainer (\$250)
Plus Quarterly minimum (5 days
* \$100/day)Expenses Not Paid Directly By Client: \$ —

Total For Period-

\$ 6750.00

*All invoices are due when received.

Client Bayer Clothing Grp Sent To: Mr. Phil Lash

Date Amount

Payment Received _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Rec'd.
only

INVOICE FOR: CONSULTING SERVICES

Invoice No 1201Date Submitted Nov 1 '00

ALVIN G. GONSALVES



P.O. Box 333

Destin, Florida 32541

P.O. Box 870629

Stone Mountain, Georgia 30087 Period Covered - Oct 1 - 31 '00

Consulting Fees -

*Balance of 3rd Quarter
minimum fee guaranteed. (See attached
info.)*

\$ <u>12.50</u>	<u>2/1/01</u>
<u>4,500</u>	<u>2/1/01</u>
\$ <u>-</u>	

Expenses Not Paid Directly By Client:

Total For Period-

\$ 5750

*All invoices are due when received.

Client Bayler Clothing Co. Sent To: P. LoobyDate Amount

Payment Received _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1185

Date Submitted Dec 4 '00

ALVIN G. GONSALVES

Rebit To

P.O. Box 333

Destin, Florida 32541

P.O. Box 870629

Stone Mountain, Georgia 30087

Period Covered - MONTH OF NOVEMBER '00

Consulting Fees -

\$ 1250 ⁰⁰

Expenses Not Paid Directly By Client:

\$ _____

Total For Period-

\$ 1250 ⁰⁰

*All invoices are due when received.

Client Buyer Clothing Group Sent To: Mr. Phil Lorry

Payment Received	Date	Amount
1/2/01		Full

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1184Date Submitted 1/4/01

ALVIN G. GONSALVES

Remit to:

P.O. Box 333

Destin, Florida 32541

P.O. Box 870629

Stone Mountain, Georgia 30087 Period Covered - 12/1/00 - 12/31/00\$ 6750.00Consulting Fees - \$1250 Retainer plus \$500 for Quarterly Minimum Billing
guarantee outlined in OCT 29, 99
letter from P. Gonsalves (4th Quarter)\$

Expenses Not Paid Directly By Client:

Total For Period:

\$ 6750.00

*All invoices are due when received.

Client Buyer Clothing Corp Sent To: Mr. Phil Ladd

Date

Amount

Payment Received

1250

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

(12/04/00 = \$500 + \$1250 retainer)

INVOICE FOR: CONSULTING SERVICES

Invoice No 1181Remit To 7Date Submitted Aug 20, 2001

ALVIN G. GONSALVES

P.O. Box 333

P.O. Box ~~870629~~Destin, Florida 32541 Stone Mountain, Georgia 30087 Period Covered - 6 months / Minimum RetainerConsulting Fees - Guarantee - 5,500 per Quarter
9/ per earlier invoice\$ 11000.00

Expenses Not Paid Directly By Client:

\$ _____

Total For Period-

\$ 11000

*All invoices are due when received.

Client Bayer Clothing Group Sent To: Mr. Phil Lobb - (Home address)1997 West A
Buckhead, Pe 18

Date Amount

Payment Received _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, that he/she is Alvin G Gansler owner of Sage Assoc, personal consulting Plaintiff herein, that he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing complaint are true and correct to the best of his/her knowledge, information and belief.

Alvin G. Gansler

(SIGN IN BLUE INK)

Sage & Assoc. is not a registered co." It is a name I use for business but billing is always for my services.

FILED

JAN 21 2002

*See
Sgt*
m 1232/acty Krause
William A. Shaw
Prothonotary
PO 80.00

1cc Sheriff

CLEARFIELD, PENNSYLVANIA 16830
P. O. BOX 1
15 NORTH FRONT STREET
ATTORNEYS AT LAW
BELLIN & KUBISTA

FILED

FEB 08 2002

John S. Brattin
William A. Shaw
Prothonotary
for
Bells

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

SAGE & ASSOCIATES, :
Plaintiff(s) :
: NO. 02 - 100 - C.D.
vs. :
: ANSWER AND NEW MATTER
BAYER CLOTHING GROUP, INC., :
formerly known as KENT :
SPORTSWEAR, INC., :
Defendant(s) :

Filed on Behalf of:
Defendant

Counsel of Record for
This Party:

Carl A. Belin, Jr., Esquire
PA I.D. #06805

BELIN & KUBISTA
15 North Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

FEB 08 2002

**William A. Shaw
Prothonotary**

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

SAGE & ASSOCIATES, :
Plaintiff(s) :
: NO. 02 - 100 - C.D.
vs. :
: :
BAYER CLOTHING GROUP, INC., :
formerly known as KENT :
SPORTSWEAR, INC., :
Defendant(s) :

NOTICE

You are hereby notified to plead to the within pleading
within twenty (20) days of service thereof, or default judgment
may be entered against you.

BELIN & KUBISTA

By 

Carl A. Belin, Jr. Esq.
Attorney for Defendant

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

SAGE & ASSOCIATES,

Plaintiff(s) :

NO. 02 - 100 - C.D.

vs.

BAYER CLOTHING GROUP, INC.,
formerly known as KENT
SPORTSWEAR, INC.,

Defendant(s) :

ANSWER AND NEW MATTER

AND NOW comes Defendant Bayer Clothing Group, Inc., formerly known as Kent Sportswear, Inc., by and through its attorneys, Belin & Kubista, and files the following Answer and New Matter to Plaintiff Sage & Associates' Complaint, and in support thereof avers as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is denied as averred and Paragraphs 11 through 17 of Defendant's New Matter is hereby incorporated by reference and made a part hereof.
4. Paragraph 4 is admitted in part that Plaintiff performed services for Defendant but it is averred that Plaintiff has been paid for all services rendered to Defendant under the agreement.

5. Paragraph 5 is denied as averred and it is averred that Plaintiff has been paid the price for services as orally agreed upon by the parties and in further answer thereto Paragraphs 11 through 17 of the New Matter are hereby incorporated by reference and made a part hereof.

6. Paragraph 6 is denied as averred and it is averred that Plaintiff has been paid the price Defendant orally agreed to pay under the contract in full and in further answer thereto Paragraphs 11 through 17 of the New Matter are hereby incorporated by reference and made a part hereof.

7. Paragraph 7 is denied that Plaintiff is owed any monies under the agreement existing between the parties and in further answer thereto Paragraphs 11 through 17 of the New Matter are hereby incorporated by reference and made a part hereof.

8. Paragraph 8 is denied that Plaintiff is owed interest on any debt and in further answer thereto Paragraphs 11 through 17 of the New Matter are hereby incorporated by reference and made a part hereof.

9. Paragraph 9 is denied and Paragraph 8 of this Answer is hereby incorporated by reference and made a part hereof.

10. Paragraph 10 is denied that Plaintiff is owed any monies from Defendant and in further answer thereto Paragraphs

11 through 17 of the New Matter are hereby incorporated by reference and made a part hereof.

NEW MATTER

11. Paragraph 1 through 10 of this Answer are hereby incorporated by reference and made a part hereof.

12. Plaintiff and Defendant entered into an oral agreement sometime prior to December 14, 1998 wherein Plaintiff was to be paid on a per diem basis for services actually rendered to the Bayer Clothing Group.

13. Pursuant to this oral agreement, Plaintiff billed Defendant in accordance with said agreement for the following invoices in the year of 1999 which are attached hereto as Exhibits and made a part hereof: 1127, 1128, 1129, 1131, 1132, 1133, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1151, 1154, 1155, 1156, 1158, 1159, 1160.

14. Thereafter the parties modified the oral agreement to provide that Plaintiff would be paid at the rate of \$1,250.00 on a retainer basis each month plus \$1,100.00 per diem for services actually rendered to Defendant. Plaintiff invoiced for said accounts which accounts were paid in full as set forth in invoice numbers: 1161, 1174, 1179, 1134, 1135, 1182, 1188, 1197, 1199, and 1185.

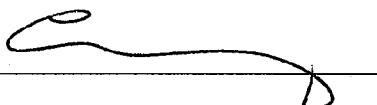
15. Plaintiff then contended he was to be paid for days not worked on the basis he was to be paid a minimum number of days each quarter, whether or not worked, in October 2000 and November 2000 which days were not paid by Defendant as set forth in invoices 1199 and 1201 which are attached hereto and made a part hereof.

16. That Plaintiff has been paid on said contract for all services rendered and the final retainer for the month of November 2000 was paid as set forth in invoice 1185 which is attached hereto and made a part hereof, and thereafter the relationship was terminated.

17. That as a result of the foregoing, Plaintiff has been paid for all services rendered under the oral agreements as reached between the parties.

WHEREFORE, Defendant demands that Your Honorable Court enter judgment in favor of Defendant and against Plaintiff.

BELIN & KUBISTA

By 

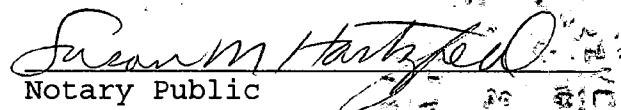
Carl A. Belin, Jr., Esq.
Attorney for Defendant

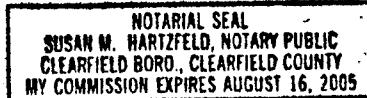
COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :
:

Before me the undersigned officer, personally appeared Philip P. Looby, who deposes and says he is the Chief Operating Officer of Bayer Clothing Group, Inc., and as such Chief Operating Officer being authorized to do so, and being duly sworn according to law, deposes and says that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of his knowledge, information and belief.


Philip P. Looby

Sworn and subscribed before me this 7th day of
February, 2002.


Susan M. Hartzfeld
Notary Public



INVOICE FOR: CONSULTING SERVICES

Invoice No 1127

Date Submitted 1/4/98

ALVIN G. GONSALVES

P.O. Box 833
Destin, Florida 32541

P.O. Box 80629
Stone Mountain, Georgia 30087

Period Covered - 12/14 Thru 12/28

Consulting Fees -

\$ 3173.00

Expenses Not Paid Directly By Client:

\$ 163.22

Total For Period
\$ 3336.92

All invoices are due when received.

Client Buyer Clothing Corp Sent To: P. Lacy

Payment Received _____

Date _____

Amount _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Taxi

Telephone, Telegram, Fax

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1129

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

~~P.O. Box 333~~
~~Destin, Florida 32541~~

~~P.O. Box 870629~~
~~Stone Mountain, Georgia 30087~~

Period Covered - Jan 4 - 8/99

Consulting Fees - (3% increase)

\$ 326.80

Expenses Not Paid Directly By Client:

\$ 274.90

Total For Period

~~All invoices~~
~~are due when received.~~

Client Baker Clothing Grp. Sent To: P. Loby

\$40,816.50

Payment Received _____

Date _____

Amount _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1131

Alvin G. Gonsalves

P.O. Box 6032

Hutchinson Island Branch

Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box ~~333~~

Destin, Florida ~~32541~~

P.O. Box ~~870629~~

Stone Mountain, Georgia 30087

Period Covered - 1/1/99 - 1/16/99

Consulting Fees -

\$ 3268 00

Expenses Not Paid Directly By Client:

\$ 702 12

Total For Period

3970.12

~~52239~~ *All invoices are due when received.

Client Byker Clothing Group Sent To: P. Landy

Date Amount

540.8145

3970.12

Payment Received

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

CHIEF CONSULTANT

ALVIN G. GONSALVES

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1132

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

↑ P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 1/18 - 22

Consulting Fees -

\$ 3,268.00

Expenses Not Paid Directly By Client:

\$ 721.23

Total For Period:

\$ 3,989.93

3835 *All invoices are due when received.

52239

Client Boyer Chayce Corp Sent To: D. Lacy

Date

Amount

Payment Received _____

540,810.00 39,899.3

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Unjust explain fully on reverse)

Taxi

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1133

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 833
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 1/25/99 - 1/29/99

Consulting Fees -

\$ 3268.00

Expenses Not Paid Directly By Client:

\$ 1186.18

Total For Period

\$ 3454.18

~~Send~~ *All invoices are due when received.

Client Boyer Clothing Corp. Sent To: P. Only

3454.18 Payment Received _____ Date _____ Amount _____

Boyer Clothing Corp.
100% SATISFACTION GUARANTEED
SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Taxi

INVOICE FOR: CONSULTING SERVICES

Alvin G. Gonsalves

P.O. Box 6032

Hutchinson Island Branch

Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 870629

Stone Mountain, Georgia 30087

P.O. Box 333
Destin, Florida 32541

Period Covered - Feb 1, 99 - 5/29

Consulting Fees -

\$ 3268 00

Expenses Not Paid Directly By Client:

\$ 361 00

Total For Period:

362 00

*All invoices are due when received.

52253 Client Bayer Clothing Co Sent To: P. Langley

140, 3105 312918
Payment Received _____ Date _____ Amount _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICESInvoice No 1137

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

~~P.O. Box 333
Destin, Florida 32541~~

Date Submitted 2/16**ALVIN G. GONSALVES**

~~P.O. Box 870629
Stone Mountain, Georgia 30087~~

Period Covered - 2/8-2/12/99Consulting Fees - \$ 3268⁹⁹Expenses Not Paid Directly By Client: \$ _____Total For Period- 30141

53239 *All invoices are due when received.

Client Bryer Clothing Co. Sent To: P. Lushy

	Date	Amount
<u>540.8165</u> <u>3268.1</u>		
Payment Received _____		

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!*49627
PA 12*

1099

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1138

Date Submitted 2/24/99

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-6032

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Feb. 15 thru 19

Consulting Fees -

\$ 326.88

Expenses Not Paid Directly By Client:

\$ 321.96

Total For Period 323.99

All invoices are due when received.

Client Byer Clothing Co. Sent To: P. Lobby

Date 3/17/99

Amount 54.75

Payment Received 326.88

Date 3/17/99

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No 1139

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

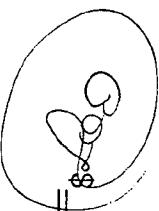
Period Covered - Feb 21 Thru 24/99
Consulting Fees -

\$ 3268.00

Expenses Not Paid Directly By Client:

\$ 247.69

Total For Period


3515.69

*All invoices are due when received.

Client Bayer Clothing Grp. Sent To: P. Lundy

Date Amount

Payment Received _____

Amount _____

Check Number: _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Check Date: _____

Handwritten signature on reverse

INVOICE FOR: CONSULTING SERVICESInvoice No. 1141

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-6032

~~↑ P.O. Box 333
Destin, Florida 32541~~

Date Submitted 3/22/99
P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 3/8/99 - 3/12/99
Consulting Fees -

\$ 3268.00
234.45
164.45



Expenses Not Paid Directly By Client:

Total For Period-

*All invoices are due when received.
\$ 3432.44

Journal	3/22/99	Client	<u>30221</u>	3/22/99	Sent To:	<u>A. Lohy</u>
Account						
Total	<u>3432.44</u>					

Payment Received _____ Date _____ Amount _____

Check Number: 60891
Check Date: 3/22/99

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

unless explained fully on reverse)

Taxi

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1142

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

Date Submitted 3/22/99

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 3/15-20/99

Consulting Fees -

\$ 3268.00

Expenses Not Paid Directly By Client:

BO \$ 1295.84

Total For Period-

Voucher: \$4563.84

*All invoices are due when received.

Account Client Byer Cutting Co Sent To: A. Landy

240 Sales 4523.84 Payment Received _____

Date _____

Amount _____

Rec'd. Month:

Rec'd. Date: 3/22/99

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1143

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 383
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 3/24 - 3/25/99

Consulting Fees -

\$ 3268.44

Expenses Not Paid Directly By Client:

\$ 539.38

Total For Period
3327.82

All invoices are due when received.

Client Buyer Clothing Co. Sent To: P. Lally

Amount 3,327.82
Date 5-22-99
Payment Received 539.38

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Check Number: 3A 1705 Date: May 03 1999

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1144

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 336
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 3/28/99 thru 4/2/99

Consulting Fees -

\$ 3,268.00

Expenses Not Paid Directly By Client:

0.00 \$ 8/3 88

\$ 4081.88

Total For Period
3,581.88

All invoices are due when received.

Client Boxer Clothing Grp Sent To: PLS by

Payment Received _____
Date _____ Amount _____
5,40,88 4081.88

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Check Date 03 1999 03 1999

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1145

Date Submitted Apr 14/99

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

ALVIN G. GONSALVES

Period Covered - April 3 thru April 1999
Consulting Fees -

\$ 3268.49

Expenses Not Paid Directly By Client:

\$ 1098.63

*① 10
802*

\$ 4366.83

Date May Amount

540.8165 4366.83

Payment Received

Total For Period -
3268.49
All invoices are due when received.

53235
Client Byee Clothing Co Sent To: 2 Lady

PROVIDING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Check for amount due
Date May 14/99

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1146

CC-A4
08/08

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - April 12, 99 thru April 15/99

Consulting Fees -

\$ 3268

\$ 389.38

*100%
08/08*

Expenses Not Paid Directly By Client:

Total For Period -

357.38
All invoices are due when received.

522.39
Client Byer Clothing Co. Sent To: D. Lady

Date Amount

4/16/00 3657.38

Payment Received _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

Checklist
Client
Consultant
Date
Amount
Signature
Initials
Comments

04/17/00

INVOICE FOR: CONSULTING SERVICES

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - 4/12/82 Thru 4/25/82
Consulting Fees -

\$ 3268.00

Expenses Not Paid Directly By Client:

\$ 1030.00

Total For Period
3837.00
Vesteele #2239 All invoices
are due when received.

Client Bryte Clothing Co. Sent To: P. Lucy

1 Mike 4298.50
Payment Received _____ Date _____ Amount _____

Check Number: 63486
Check Date: 5/1/82

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1148

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 3338
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - April 26 thru 30

Consulting Fees - \$ 3268.44

Expenses Not Paid Directly By Client:

\$ 836.15

CGC

\$ 4104.15

WEEKEND Total For Period	525.75
Visiting	525.75
*All invoices are due when received.	
Client <u>Buyer Clothing</u> Sent To: <u>P. L. Kelly</u>	
<u>Alvin G.</u>	<u>4/10/45</u>
Payment Received	
Date	
Amount	
Check Number	<u>1234567890</u>
Check Date	

CGC

\$ 4104.15

CGC

CC
INVOCIE FOR: CONSULTING SERVICES

Date Submitted 6/30/99 Invoice No 1151

ALL
DOS


Alvin Gonsalves
P.O. Box 6032
Jensen Beach, FL 34957

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

Period Covered -

P.O. Box 870629
Stone Mountain, Georgia 30087

Consulting Fees -

\$ 14,157.00

Southwark

Expenses Not Paid Directly By Client: (4 wks Expenses) \$ 3955.43

3955.43

40269
Voucher: Total For Period
Vendor: 3237
All invoices are due when received.

OK

18,104.64

\$ 18,104.64

Client Ray Sent To: John

Date

Amount

Payment Received 11600 Date 18/12/99

Amount 11600 Date 18/12/99

Amount 11600 Date 18/12/99

Amount 11600 Date 18/12/99

3rd SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

PAID JUL 13 1999

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1154

Date Submitted 7/27/99

ALVIN G. GONSALVES



Alvin Gonsalves
P.O. Box 6032
Jensen Beach, FL 34957

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - July 1 thru July 30, 1999
Consulting Fees -

\$ 14,150.00

Expenses Not Paid Directly By Client: (4 weeks Expenses)

\$ 2,209.86 2,347.31

4,292.00
Total
Fees
for
Period

5,843.00
*All invoices are due when received.

Client Southwick Clothes Sent To: P. Lawyer

Date 7/27/99

Amount 14,150.00

Payment Received 0.00

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1155

cc
Au
Recs

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

Date Submitted Sept 4, 1999

P.O. Box 383
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Aug 1 '99 Thru Sept 2, '99

Consulting Fees -

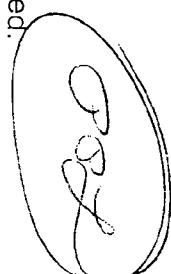
\$ 14,150.00

Expenses Not Paid Directly By Client:

\$ 2,323.73

40120
Total For Period
\$223.90

*All invoices are due when received.



16511.28
16473.73

Client Sauhnick Die & Beyer Sent To: P. L. G.

11160

16511.28

Date

Amount

Payment Received

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1158

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

P.O. Box 333

Destin, Florida 32541

ALVIN G. GONSALVES

P.O. Box 870629

Stone Mountain, Georgia 30087

Period Covered - Oct 1-Nov 5, 1999

Consulting Fees -

\$ 14,150.00

50.9951

50.9951

Expenses Not Paid
Directly By Client:

\$ 1647.63

15,747.13

Total For Period-

1647.63

\$ 15,797.63

*All invoices are due when received.

Client Bayer Clothing Corp. Sent To: P. Logos

Date

Amount

Payment Received _____

Taxi

(must explain fully on reverse)

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1159

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 333
Destin ~~Florida~~ 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Nov 1 '99 thru 12/1 '99
Consulting Fees -

\$ 14,150.00

Expenses Not Paid Directly By Client:

\$ 1550.35

Total For Period - 53243

*All invoices are due when received.

Client Buyer Clothing Group Sent To: P. Lasser

1/1/2000 1550.35 1550.35 Payment Received _____
Date _____ Amount _____

*Alvin G. Gonsalves
SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!*

cc and Sons

INVOICE FOR: CONSULTING SERVICES

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 33957-6032

ALVIN G. GONSALVES

Date Submitted

Invoice No. 1160

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Dec 1 Thru Dec 30, 1999
Consulting Fees -

\$ 14,150.00

Expenses Not Paid Directly By Client:

\$ 2,514.14

Total For Period 5-4079
3,239

50%
\$ 16,664.14

*All invoices are due when received.

Client Boyer Clothing Group Sent To: P. Lovsky

Boyer Clothing Group
Date 1/14/00 Amount 16,664.14
Payment Received 1/14/00

4451
W/ **SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!**

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1161

cc

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 870629

Destrip, Florida 32541

Stone Mountain, Georgia 30087

Period Covered - 1/1/2000 - 1/30/2000

Consulting Fees - 4 1/2 Days, plus retainer

$$4.5 \times 1100 = \frac{4400}{500}$$

4900

1250

6150

Expenses Not Paid Directly By Client: 6150.98

6150.98

1250.00

580.98

580.98

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INVOICE FOR: CONSULTING SERVICES

Invoice No. 1174

Date Submitted

March 18 2000

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 870629

Stone Mountain, Georgia 30087

Period Covered - Feb 1-28-2000

Consulting Fees - Retainer, plus 4 hrs.
including 1250 + 550

\$ 1300

Expenses Not Paid Directly By Client:

\$

59570
Total For Period-
52230

*All invoices are due when received.

Client Boyer Clothes Sent To: D. Luby

430,874.5 1250.00 Date

1,160 550.00 Amount

1800.00 Payment Received

1800.00

4/3/00 SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

OK
COPY \$ 1800.00

CC

INVOICE FOR: CONSULTING SERVICES

卷之三

Alvin G. Gonçalves

Alvin G. Goncalves

P O Box 6032

Hutchinson Island Branch
Intercoastal Branch FL 34657 00000

Jensen Beach, FL 34937-0032

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111

ALVIN G. GUNSAVES

Date Submitted

Invoice

1179

Period Covered - March 1-31, 00
Consulting Fees - (Retainer)

\$ 1250.00

Expenses Not Paid Directly By Client:

52239 * All invoices
Total FOB Period
60075

... and invoices are due when received

Client Boyle nothing Sent To: P. Lovy

2630.8165

Payment Received

Date

Amount

4/3/11 SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!
4/10/2022

Total For Period
52239 * All invoices
Client Byer
630.8165 1250,-
4/10/02 SERVING

INVOICE FOR: CONSULTING SERVICES

Invoice

No 1135

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

Date Submitted

6/10/00

Run off to
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - May 1 thru May 31, 2000
Consulting Fees - Retainer - (May)

\$ 1250.00

Expenses Not Paid Directly By Client:

\$

Total For Period

53X
\$ 1250.00

**All invoices are due when received.*

Client Player

Sent To: P. L. Derry

630.8165 1250.00

Date

Amount

7/4/00

Payment Received

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Alvin G. Gonsalves
Editor

H.P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSAVES

Invoice No. 1188
Date Submitted 8/1/00

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087 □

Period Covered - 7/1 - 00 - 8/1/00

Vonleben

Vendor: *John C. S.*

172

Expenses Not Paid Directly By Client

Total For Period-

*All invoices are due when

Lo 30.50
12.50
TOTAL
Check Number: 8203
Check Dated: 8/14
12.50

Payment Received _____ Date _____ Amount _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1197

Date Submitted 9/5/00

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 870629
Stone Mountain, Georgia 30087

Remit To

P.O. Box 233
Destin, Florida 32541

Period Covered - Aug 1, '00 Thru 8/31/00

Consulting Fees - 1/2 (Retainer)

\$ 1,250 00

Expenses Not Paid Directly By Client: \$ _____

Total For Period-

*All invoices are due when received.

Client Bayer Clothing Grp. Sent To: Mr. Phil Loozy

\$ 1,250 00

Date

Amount

Payment Received _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

69837
52237

630,3165 1250,-

87272
9/18/00

INVOICE FOR: CONSULTING SERVICES

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

Invoice No. 1199

Date Submitted 10/2/00

ALVIN G. GONSALVES

P.O. Box ~~333~~

Destin, Florida 32541

P.O. Box ~~870629~~

Stone Mountain, Georgia 30087

Period Covered - 9/1/00 thru 9/30/00

Consulting Fees - *Monthly Retainer (\$1250)
Plus Quarterly minimum (5 days
x \$100/day)*

\$ 6750.00

Expenses Not Paid Directly By Client:

\$ —

Total For Period-

\$ 6750.00

*All invoices are due when received.

Client Bayer Clothing Grp. Sent To: Mr. Phil Lauby

Date

Amount

Payment Received —

—

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

71757
52239

Credit 630,816.5 1250,-

9033

10/16

INVOICE FOR: CONSULTING SERVICES

Invoice No. 1201

Alvin G. Gonsalves
P.O. Box 6032
Hutchinson Island Branch
Jensen Beach, FL 34957-0032

ALVIN G. GONSALVES

P.O. Box 333
Destin, Florida 32541

P.O. Box 870629
Stone Mountain, Georgia 30087

Period Covered - Oct 1 - 31 03

Consulting Fees

*Balance of 3rd Quarter
minimum fee guarantee (See attached)
(See attached)*

\$ 12,500.00

Expenses Not Paid Directly By Client:

\$ 4,500.00

Total For Period

\$ 57,500.00

*All invoices are due when received.

Client P. L. G. G. Sent To: P. L. G. G.

Payment Received _____ Date _____ Amount _____

SERVING YOUR MANAGEMENT NEEDS IS MY COMMITMENT!

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

SAGE & ASSOCIATES, :
Plaintiff(s) :
: NO. 02 - 100 - C.D.
vs. :
: BAYER CLOTHING GROUP, INC., :
: formerly known as KENT :
: SPORTSWEAR, INC., :
Defendant(s) :

CERTIFICATE OF SERVICE

This is to certify that the undersigned has sent a true and correct copy of Defendant's Answer and New Matter in the above-captioned matter to the following party by postage prepaid United States mail on February 8th, 2002:

Nicholas D. Krawec, Esquire
Jon A. McKechnie, Esquire
Bernstein Law Firm, P.C.
1133 Penn Avenue
Pittsburgh, PA 15222

BELIN & KUBISTA

By 
Carl A. Belin, Jr., Esq.
Attorney for Defendant

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 1199

SAGE & ASOCIATES

02-100-CD

VS.

BAYER CLOTHING GROUP, INC. f/k/a KENT SPORTSWEAR, INC.

COMPLAINT

SHERIFF RETURNS

**NOW JANUARY 22, 2002 AT 1:15 PM EST SERVED THE WITHIN COMPLAINT
ON BAYER CLOTHING GROUP, INC. f/k/a KENT SPORTSWEAR, INC.,
DEFENDANT AT EMPLOYMENT, RR#4 BOX 91B, CLEARFIELD, CLEARFIELD
COUNTY, PENNSYLVANIA BY HANDING TO HEATHER RESSLER, PAYROLL
CLERK A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND
MADE KNOWN TO HER THE CONTENTS THEREOF.**

SERVED BY: COUDRIET

Return Costs

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

FILED

MAR 25 2002

**01930 am
William A. Shaw
Prothonotary**

So Answers,

Ches A. Hawkins
Chester A. Hawkins

Sheriff

Sworn to Before Me This

25th Day Of March 2002

Jacqueline Hendrick

**Deputy Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA**

W.A. Shaw

<

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SAGE & ASSOCIATES,

Plaintiff,

No. 02-100-C.D.

vs.

PLAINTIFF'S REPLY TO NEW MATTER

BAYER CLOTHING GROUP, INC.,
formerly known as KENT
SPORTSWEAR, INC.,

Defendant.

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF THIS PARTY:

NICHOLAS D. KRAWEC, ESQUIRE
PA I.D. #38527
JON A. MCKECHNIE, ESQUIRE
PA I.D. #36268
Bernstein Law Firm, P.C.
Firm #718
1133 Penn Avenue
Pittsburgh, PA 15222
412-456-8100

DIRECT DIAL: (412) 456-8114

BERNSTEIN FILE NO. C0010224

FILED

APR 29 2002

m10:45/nacc
William A. Shaw GWD
Prothonotary

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

SAGE & ASSOCIATES,

Plaintiff,

vs.

Civil Action No. 02-100-C.D.

BAYER CLOTHING GROUP, INC.,
formerly known as KENT
SPORTSWEAR, INC.,

Defendant.

PLAINTIFF'S REPLY TO NEW MATTER

AND NOW COMES Plaintiff, by counsel, Bernstein Law Firm, P.C., and files the following
Reply to Defendant's New Matter, averring is support thereof the following:

11. Denied as stated. The multiple allegations of ¶11 of Defendant's New Matter are denied to the extent they contradict paragraphs 1 through 10 of Plaintiff's Complaint, which are incorporated herein by reference thereto.

12. Admitted.

13. Admitted, with the further averment that said invoices were for work done by Plaintiff prior to the year 2000.

14. Specifically denied. To the contrary, the Agreement for service for the year 2000 was outlined in a letter of October 29, 1999, from Phil Looby of Defendant to Al Gonsalves of Plaintiff, which committed Defendant to not less than one full five day week per quarter during the year 2000, in addition to the monthly retainer. A true and correct copy of said letter of October 29, 1999, with Plaintiff's

notations on it from a phone conversation with Defendant, is attached hereto, marked Exhibit "1", and made a part hereof. The "rates" for these services were later increased to \$1,250.00 per month for the monthly retainer and \$1,100.00 per day for other billing.

15. Denied as stated. To the contrary, the invoices involved are invoice numbers 1184, 1201, 1199 and 1181. Said invoices are attached as exhibits to Plaintiff's Complaint.

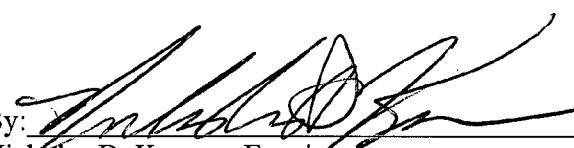
16. Specifically denied. To the contrary, Plaintiff has not been paid for all contract services rendered. Strict proof to the contrary is demanded at the trial.

17. Specifically denied for the reasons set forth in paragraphs 15 and 16 above, which are incorporated herein by reference thereto.

WHEREFORE, Plaintiff requests that Defendant's New Matter be dismissed with prejudice, and Judgment entered in favor of Plaintiff.

Respectfully submitted,

BERNSTEIN LAW FIRM, P.C.

By: 
Nicholas D. Krawec, Esquire
Attorney for Plaintiff
PA I.D. #38527
1133 Penn Avenue
Pittsburgh, PA 15222
(412) 456-8103

Oct 29-99 02:53P Bayer Clothing Group, Inc. 814 765 0797

P.01



BAYER CLOTHING GROUP, INC.

RD4, Box 918, Target Square • Clearfield, PA 16830 • Voice: (814) 765-7521 • Fax: (814) 765-0774

October 29, 1999

and 1-11-00

To: Al Gonsalves
 From: Phil Looby

First, and most important to me, I want to thank you for your efforts and results during the last three years. Early in my career it had been my great fortune to have worked with you. You personally provided an environment for learning that, to this day is, to me and many others, the standard against which all others will be measured.

I considered it my good fortune to be able to call upon you three years ago to help me personally and BCG during our (longer than expected) transition.

While the market was tumultuous, I trust our time together here has been professionally interesting. Consider: KB start up; the first modular coat shop - three days; guiding Ozd et al; leading the rebirth of Southwick; all this while overseeing a complex manufacturing group "part-time" few could imagine it and I can't think of another to have done it.

You are truly special.

Enough already, back to the purpose of my note.

While we do not have any specific items or projects in mind, we would suggest an arrangement between you and BCG (for the collected group of RIB entities) for calendar 2000. We suggest an arrangement that would secure access to your services for not less than one full five (5) day week per calendar quarter.

For this we suggest the following understanding:

- A. We would provide as much notice as possible, but not less than two weeks.
- B. Retainer amount of \$1,000/month January through December

Changed in Phil letter 2/10 to \$250/mo.

EXHIBIT "J"

Send Tapes for review by 10/14/99

RECEIVED 10/12/99
for ketz

C. Daily fees of:

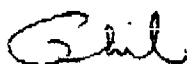
1. For continental U.S. and Latin America - \$750/day plus expenses.
2. For other locations \$1,000/day plus expenses.

All, I hope both the time and economics are acceptable, providing with the certainty of a continuing professional relationship through December 2000.

Please do contact me, either by note or phone with your thoughts. Upon our agreement, I will formalize our understanding in writing to you.

Thanks again.

Sincerely,



VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, that he is ALVIN G. GONSALVES of Sage & Associates, Plaintiff herein, that he is duly authorized to make this Verification, and that the facts set forth in the foregoing Reply to New Matter are true and correct to the best of his knowledge, information and belief.

Alvin G. Gonsalves

(Sign in blue ink)

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

SAGE & ASSOCIATES,

Plaintiff,

vs.

Civil Action No. 02-100-C.D.

BAYER CLOTHING GROUP, INC.,
formerly known as KENT
SPORTSWEAR, INC.,

Defendant.

CERTIFICATE OF SERVICE

I, Nicholas D. Krawec, Esquire, hereby certify that a true and correct copy of the PLAINTIFF'S REPLY TO NEW MATTER was served on the following parties by regular U.S. Mail, postage prepaid, this 25th day of April, 2002, addressed as follows:

Carl A. Belin, Jr., Esquire
Belin & Kubista
15 North Front Street
P.O. Box 1
Clearfield, PA 16830



Nicholas D. Krawec, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SAGE & ASSOCIATES,

Plaintiff

No. 02-100-CD

vs.

PRAECIPE FOR ARBITRATION

BAYER CLOTHING GROUP, INC.
formerly known as KENT
SPORTSWEAR, INC.,

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

NICHOLAS D. KRAWEC, ESQUIRE
PA I.D. #38527
Bernstein Law Firm, P.C.
Firm #718
1133 Penn Avenue
Pittsburgh, PA 15222
412-456-8100

DIRECT DIAL: (412) 456-8103

BERNSTEIN FILE NO. C0010224

FILED

JUN 20 2002

7/1/2002 Atty Krawec
William A. Shaw
Prothonotary pd 20.00

Copy Atty
Copy CA

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

SAGE & ASSOCIATES

Plaintiff

vs.

Civil Action No. 02-100-CD

BAYER CLOTHING GROUP, INC.
formerly known as KENT
SPORTSWEAR, INC.,

Defendant

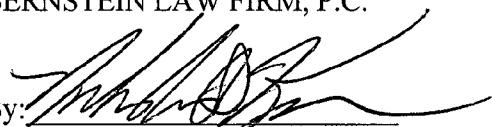
PRAECIPE FOR ARBITRATION

TO THE PROTHONOTARY:

Kindly refer the above-captioned matter to a Board of Arbitrators for an Arbitration Trial.

BERNSTEIN LAW FIRM, P.C.

By:


Nicholas D. Krawec, Esquire
Attorney for Plaintiff
1133 Penn Avenue
Pittsburgh, PA 15222
(412) 456-8103

BERNSTEIN FILE NO. C0010224

CERTIFICATE OF SERVICE

I, Nicholas D. Krawec, Esquire, hereby certify that a true and correct copy of the foregoing Praeclipe for Arbitration was served on the Defendant's attorney by regular U. S. Mail, postage prepaid, this 17th day of June, 2002, addressed as follows:

Carl A. Belin, Jr., Esq.
Belin & Kubista
15 North Front Street
P.O. Box 1
Clearfield, PA 16830





OFFICE OF COURT ADMINISTRATOR
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PENNSYLVANIA 16830

DAVID S. MEHOLICK
COURT ADMINISTRATOR

PHONE: (814) 765-2641
FAX: 1-814-765-~~0000~~ 7449

MARCY KELLEY
DEPUTY COURT ADMINISTRATOR

August 6, 2002

Nicholas D. Krawec, Esquire
Bernstein Law Firm, P.C.
1133 Penn Avenue
Pittsburgh, PA 15222

Carl A. Belin, Jr., Esquire
Belin & Kubista
Post Office Box 1
Clearfield, PA 16830

RE: SAGE & ASSOCIATES
vs.
BAYER CLOTHING GROUP, INC., al
No. 02-100-CD

Dear Counsel:

The above case is scheduled for Arbitration Hearing to be held Friday, October 25, 2002. The following have been appointed to the Board of Arbitrators:

Richard A. Bell, Esquire
Earle D. Lees, Jr., Esquire
Jeffrey S. DuBois, Esquire
David R. Thompson, Esquire
Lee Ann Heltzel, Esquire

If you wish to strike an Arbitrator, you must notify the undersigned within seven (7) days from the date of this letter the name you wish stricken from the list.

You will be notified at a later date the exact time of the Arbitration Hearing.

Very truly yours,
Marcy Kelley
Marcy Kelley
Deputy Court Administrator



OFFICE OF COURT ADMINISTRATOR
FORTY-SIXTH JUDICIAL DISTRICT OF PENNSYLVANIA

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PENNSYLVANIA 16830

DAVID S. MEHOLICK
COURT ADMINISTRATOR

PHONE: (814) 765-2641
FAX: 1-814-765-~~0000~~ 7449

MARCY KELLEY
DEPUTY COURT ADMINISTRATOR

August 20, 2002

Nicholas D. Krawec, Esquire
Bernstein Law Firm, P.C.
1133 Penn Avenue
Pittsburgh, PA 15222

Carl A. Belin, Jr., Esquire
Belin & Kubista
Post Office Box 1
Clearfield, PA 16830

RE: SAGE & ASSOCIATES
vs.
BAYER CLOTHING GROUP, INC., al.
No. 02-100-CD

Dear Counsel:

The above case is scheduled for Arbitration Hearing to be held Friday, October 25, 2002 at 8:30 A.M. The following have been appointed as Arbitrators:

Richard A. Bell, Esquire, Chairman
Jeffrey S. DuBois, Esquire
David R. Thompson, Esquire

Pursuant to Local Rule 1306A, you must submit your Pre-Trial Statement seven (7) days prior to the scheduled Arbitration. The original should be forwarded to the Court Administrator's Office and copies to opposing counsel and each member of the Board of Arbitrators. For your convenience, a Pre-Trial (Arbitration) Memorandum Instruction Form is enclosed as well as a copy of said Local rule of Court.

Very truly yours,

Handwritten signature of Marcy Kelley.

Marcy Kelley
Deputy Court Administrator

cc: Richard A. Bell, Esquire
Jeffrey S. DuBois, Esquire
David R. Thompson, Esquire

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

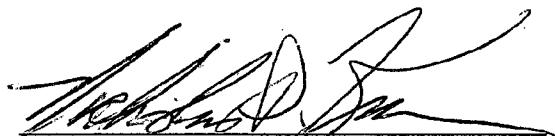
SAGE & ASSOCIATES, :
Plaintiff(s) :
: NO. 02 - 100 - C.D.
vs. :
: BAYER CLOTHING GROUP, INC., :
: formerly known as KENT :
: SPORTSWEAR, INC., :
Defendant(s) :
:

PRAECIPE

TO THE PROTHONOTARY:

Please mark the above matter settled, discontinued and ended.

BERNSTEIN LAW FIRM, P.C.



Nichols D. Krawec, Esquire

FILED

SEP 12 2002

William A. Shaw
Prothonotary

FILED

No
cc

01/10/03 7:45 AM
SEP 12 2002

1 Cert. to Arg (by Belina Kubista)

William A. Shaw
Prothonotary

W.A.S.

COPY

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

CIVIL DIVISION

Sage & Associates

Vs.

No. 2002-00100-CD

**Bayer Clothing Group, Inc.,
formerly known as Kent
Sportwear, Inc.**

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on September 12, 2002 marked:

Settled, Discontinued and Ended

Record costs in the sum of \$130.00 have been paid in full by Nichols D. Krawec, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 12th day of September A.D. 2002.

William A. Shaw, Prothonotary