

02-187-00
GOOD TIRE SERVICE "vs" BERNARD HATFEN

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION-LAW

GOOD TIRE SERVICE,
Plaintiff

vs.

BERNARD HATTEN,
Defendant

No. 02-187-CO

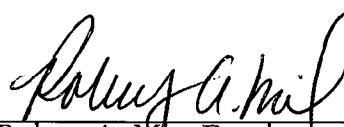
PRAECIPE

TO THE PROTHONOTARY:

No appeal has been timely filed from the judgment entered by District Justice Patrick N. Ford on June 22, 1998, in favor of Plaintiff Good Tire Service and against Defendant Bernard Hatten in the amount of \$1,738.92. Please enter said judgment in the Court of Common Pleas of Clearfield County, Pennsylvania. A certified copy of the record of the proceeding before District Justice Patrick N. Ford is attached hereto.

LEE, MARTIN, GREEN & REITER, INC.:

By:



Robert A. Mix, Esquire
Attorney for Plaintiff
115 E. High St., P.O. Box 179
Bellefonte, PA 16823
(814) 355-4769

Date: February 7, 2002

FILED

FEB 08 2002

William A. Shaw
Prothonotary

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-01

DJ Name: Hon.

PATRICK N. FORD

Address: **109 NORTH BRADY STREET
P.O. BOX 452
DUBOIS, PA**

Telephone: **(814) 371-5321 15801**

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF: NAME and ADDRESS

**GOOD TIRE SERVICE
401 SOUTH WATER ST
KITTANNING, PA 16201**

VS.

DEFENDANT: NAME and ADDRESS

**HATTEN, BERNARD
BOX 129
GRAMPIAN, PA 16838**

**PATRICK N. FORD
109 NORTH BRADY STREET
P.O. BOX 452
DUBOIS, PA 15801**

Docket No.: **CV-0000319-98**
Date Filed: **5/19/98**



THIS IS TO NOTIFY YOU THAT:

Judgment:

DEFAULT JUDGMENT PLTF

02-187-CP

- Judgment was entered for: (Name) **GOOD TIRE SERVICE**
- Judgment was entered against: (Name) **HATTEN, BERNARD**
- in the amount of \$ **1,738.92** on: (Date of Judgment) **6/22/98**
- Defendants are jointly and severally liable. (Date & Time) _____
- Damages will be assessed on: _____
- This case dismissed without prejudice. _____
- Amount of Judgment Subject to Attachment/Act 5 of 1996 \$ _____
- Levy is stayed for _____ days or generally stayed.
- Objection to levy has been filed and hearing will be held: _____

| | |
|--|--------------------|
| Amount of Judgment | \$ 1,685.42 |
| Judgment Costs | \$ 53.50 |
| Interest on Judgment | \$.00 |
| Attorney Fees | \$.00 |
| Total | \$ 1,738.92 |
| Post Judgment Credits | \$ _____ |
| Post Judgment Costs | \$ _____ |
| Certified Judgment Total \$ _____ | |

| | |
|-------|--------|
| Date: | Place: |
| Time: | |

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

622-98 Date *Patrick N. Ford*, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

1-202 Date *Patrick N. Ford*, District Justice

RECEIVED
Bellomy Law Office
FEB 10 2002
COPY TO: *[Signature]*

FILED
FEB 08 2002
11:31 AM
William A. Shaw
Prothonotary
Notice to def
Statement to pl's Atty
[Signature]

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Good Tire Service
Plaintiff(s)

No.: 2002-00187-CD

Real Debt: \$1,738.92

Atty's Comm:

Vs.

Costs: \$

Int. From:

Bernard Hatten
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: February 8, 2002

Expires: February 8, 2007

Certified from the record this 8th day of February, 2002

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt,
Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

COPY

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Good tire service

Vs.

No. 2002-00187-CD

Bernard Hatten

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$1,738.92 on the February 8, 2002.

William A. Shaw
Prothonotary

William A. Shaw

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

GOOD TIRE SERVICE,)
Plaintiff : No. 2002-00187-CD
vs. :
BERNARD HATTEN,)
Defendant :)

ORDER

AND NOW, this 19th day of April, 2002, after
consideration of Plaintiff's Motion to Compel Discovery, Defendant is hereby Ordered to serve
Answers to Interrogatories on Plaintiff within 20th day of the date of this Order.

BY THE COURT

FILED

APR 19 2002

William A. Shaw
Prothonotary

FILED

1cc

013-3584
APR 19 2002
Atty Mix

William A. Shaw
Prothonotary

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

GOOD TIRE SERVICE,

Plaintiff) : No. 2002-00187-CD
)
 :
)
 :
Defendant)

FILED

APR 16 2002

11:48 | no cc
William A. Shaw
Prothonotary *[Signature]*

MOTION TO COMPEL DISCOVERY

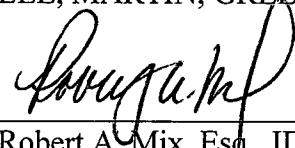
NOW COMES Plaintiff Good Tire Service, by its attorneys, Lee, Martin, Green & Reiter, Inc., and respectfully represents:

1. On February 14, 2002, Plaintiff Good Tire Service filed and served Interrogatories on Defendant Bernard Hatten. A true and correct copy of said Interrogatories is attached hereto, incorporated herein and marked Exhibit "A".
 2. To date of filing of this Motion to Compel Discovery, Defendant has not filed and served Answers to said Interrogatories, nor has he filed objections thereto.
 3. To date of filing this Motion to Compel Discovery, Defendant has not requested an extension of time for the filing and service of Answers to Interrogatories nor has an extension otherwise been granted.
 4. Defendant has not filed timely Answers to Interrogatories as required by the Pennsylvania Rules of Civil Procedure.

WHEREFORE, Plaintiff Good Tire Service respectfully requests Your Honorable Court to issue an Order compelling Defendant to file and serve Answers to said Interrogatories within twenty days or such other period of time as the Court may deem appropriate.

LEE, MARTIN, GREEN & REITER, INC.

By:



Robert A. Mix, Esq., ID 16164
Attorney for Plaintiff
115 East High Street
PO Box 179
Bellefonte, PA 16823
814-355-4769

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

GOOD TIRE SERVICE,)
Plaintiff : No. 2002-00187-CD
)
vs. :
)
BERNARD HATTEN, :
Defendant)

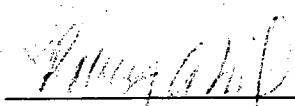
INTERROGATORIES

To: Bernard Hatten

Pursuant to Pennsylvania Rules of Civil Procedure 4006, et seq., the Plaintiff, Good Tire Service, by its attorneys, Lee, Martin, Green & Reiter, Inc., files upon Richard Hatten Interrogatories and demands that he files full, complete and verified written answers thereto within thirty (30) days after the date of service hereof, pursuant to the Pennsylvania Rules of Civil Procedure No. 4006. In accordance with said rule, any objections shall be signed by the attorney making them.

These Interrogatories are continuing and require supplemental answers under oath if the Defendant, Bernard Hatten, his attorney or representative, obtains any additional information requested in these Interrogatories prior to the time of trial.

LEE, MARTIN, GREEN & REITER, INC.

By: 

Robert A. Mix, Esq., ID #16164
Attorney for Plaintiff
115 East High Street
PO Box 179
Bellefonte, PA 16823
814-355-4769

EXHIBIT

tabbed

A

INSTRUCTIONS FOR ANSWERING INTERROGATORIES

- A. In accordance with Pa. R.C.P. No. 4005, original written Interrogatories have been served upon you to be answered by the party served or, if the party served is a public or private corporation or similar entity or a partnership or association, by any officer or agent, who shall furnish such information as is available to the party.
- B. In accordance with Pa. R.C.P. No. 4006, written answers shall be inserted in the spaces provided in the Interrogatories. If there is insufficient space to answer an Interrogatory, the remainder of the answer shall follow on a supplemental sheet.
- C. In accordance with Pa. R.C.P. No. 4006(b), a sufficient answer to such an Interrogatory shall be to specify the records from which the answer may be derived or ascertained.
- D. Please return these original Interrogatories to our office with inserted answers.
- E. For purposes of these Interrogatories, the following definitions shall apply:
 1. "Document" means any written, recorded or graphic matter, however produced or reproduced.
 2. "Identify" or "identification" when used in reference to an individual person means to state his name, present or last known address, present or last known position and business affiliation and his position and business affiliations at all times during the period covered by the Complaint.
 3. "Describe" or "identify" when used in reference to a document means to state the type of document (for example, letter, memorandum, telegram, chart, etc.), the date, author, addresses, title file and identifying number and symbol, and the name and address of its custodian. If any such documents are no longer in your possession or subject to your control, state what disposition was made of it and the date thereof.

1. REAL ESTATE: Do you have an ownership or interest in any real estate anywhere in the United States?

If so, set forth a brief description thereof, include the structure and lot size and type of construction; the volume and page number of the official record thereof; and whether you own it solely or together with any other person or persons and give their full names and addresses. If any of the above properties are mortgaged, supply the names and addresses of lenders, the date and amount of the mortgage, where it is recorded, the monthly payments and the balance now due.

ANSWER:

2. **AGREEMENTS:** State whether you have any agreements involving the purchase of any real estate anywhere in the United States. If so, state with whom this agreement is made, and state whether or not any persons are joined with you in the agreement. Supply full names and addresses of all parties concerned. If the said agreement is recorded, provide the state and county of recordation, volume and page numbers.

ANSWER:

3. MORTGAGES: State whether you own any mortgages against any real estate owned by another person in the United States. If so, state whether or not you own this mortgage with any other person or persons and, if so, supply their full name and address. State further the names and addresses of all borrowers and the state and county where said mortgage is recorded together with the number of the volume and the page number.

ANSWER:

4. **DEBTS, NOTES & JUDGMENTS:** State the names and addresses of any and all persons whom you believe owes you money and set forth in detail the amount of money owed, the terms of payment and whether or not you have written evidence of this indebtedness and, if so, give full details. If you hold a judgment or judgments as security for any of these debts, state where and when the judgment was recorded; and the county, number and term where the judgment is recorded. If you hold this judgment or judgments jointly with any other person or persons, give their name and address.

ANSWER:

5. **GOVERNMENT, MUNICIPAL OR CORPORATE BONDS:** State whether you own individually or jointly any corporate or governmental bonds. If so, include the face amount, serial numbers and maturity date and state the present location thereof. If you own any of these bonds jointly with any other person or persons, give their full name and address.

ANSWER:

6. **STOCKS, SHARES OR INTEREST:** State whether you own any stocks, shares or interest in any corporation or unincorporated association or partnership interest, limited or general, and state the location thereof. Include the names and addresses of the organizations and the serial numbers of the shares or stocks. If you own any of the stocks, shares or interest jointly with any other person or persons, give their name and address.

ANSWER:

7. ACCOUNTS: State whether you maintain any checking or savings accounts. If so, state the name and location of the banks or savings and loan association or building and loan association or credit union and the branch or branches thereof, the identification numbers of those accounts and the amount of assets you have in each account. If you maintain any of these jointly with any person, give their name and address.

ANSWER:

8. SAFETY DEPOSIT BOXES: State whether you maintain any safety deposit box or boxes. If so, include the name of the bank or banks, branch or branches and the identification number or other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If you maintain any of these jointly with another person, give their full name and address.

ANSWER:

9. TRANSFERRED ASSETS AND GIFTS: If, since the date upon which the debt herein was first incurred to the Plaintiff herein, you have transferred any assets (real property, personal property, chose in action) to any person and/or if you have given any gift of any asset, including money, to any person, set forth in detail a description of the property, the type of transaction and the name and address of the transferee or recipient.

ANSWER:

10. **PERSONAL PROPERTY:** State whether you own any personal property. Include a full description of all furnishings and other items of personal property (including jewelry) with full description, value and present location. State also whether or not there are any encumbrances on that property and if so, the name and address of the encumbrance holder, the date of the encumbrance, the original amount of that encumbrance, the present balance of that encumbrance and the transaction which gave rise to the existence of the encumbrance. If you own any personal property jointly with any other person or persons, give their name and address.

ANSWER:

11. **MOTOR VEHICLES:** State whether you own any motor vehicles. Include a full description of such motor vehicles including color, model, title number, serial number and registration plate number. Also, show the exact name or names in which the motor vehicles are registered, the present value of those motor vehicles and their present location and place of regular storage, garaging or parking. State also whether there are any encumbrances on those motor vehicles and if so, the name and address of the encumbrance holder, the date of the encumbrance, the original amount of the encumbrance, the present balance of the encumbrance and the transaction which gave rise to the existence of the encumbrance.

ANSWER:

12. **OTHER ASSETS:** If you have any asset or assets which are not disclosed in the preceding Interrogatories, please set forth all details concerning those assets.

ANSWER:

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

GOOD TIRE SERVICE,)
Plaintiff : No. 2002-00187-CD
)
vs. :
)
BERNARD HATTEN, :
Defendant)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Interrogatories was
deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania, on the 14th
day of September, 2002 addressed to the following:

Mr. Bernard Hatten
Box 129
Grampian, PA 16838



Robert A. Mix

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

GOOD TIRE SERVICE,)
Plaintiff : No. 2002-00187-CD
vs. :
BERNARD HATTEN,)
Defendant)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Compel

Discovery was deposited in the United States mail, postage prepaid, in Bellefonte, Pennsylvania, on the 18 day of April, 2002 addressed to the following:

Mr. Bernard Hatten
Box 129
Grampian, PA 16838

Robert A. Mix