

02-1186-CD
BOBBY J. BRATTON & VICKI L. VS. LEO J. NELEN

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

No. 02 - 1186 - CD

Type of Pleading:

COMPLAINT

Filed on behalf of:

Plaintiff

Counsel of Record for
this party:

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

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

FILED

JUL 30 2002

William A. Shaw
Prothonotary

On 7.30.02 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


Deputy Prothonotary

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
 Plaintiffs,

v.

LEO J. NELEN,
an individual,
 Defendant.

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No. 02 - 1186 - CD

NOTICE

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

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

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

(814) 765-2641

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

BOBBY J. BRATTON and *
VICKI L. BRATTON, *
husband and wife, *
Plaintiffs, *

v. *

No. 02 - 1186 - CD

LEO J. NELEN, *
an individual, *
Defendant. *

C O M P L A I N T

NOW COMES the Plaintiffs, BOBBY J. BRATTON and VICKI L. BRATTON, by their attorney, James A. Naddeo, Esquire, and set forth the following:

1. Plaintiffs, Bobby J. Bratton and Vicki L. Bratton, are married individuals who reside at 501 South Fourth Street, Apartment C, Clearfield, Pennsylvania 16830.

2. Defendant, Leo J. Nelen, is an adult individual who resides at RD1 Grampian, Pennsylvania 16838.

3. That at all times referred to herein, Plaintiffs were the owners of a certain double wide mobile home more particularly identified as a 1989 Liberty Mobile Home, VIN #08L60349XU.

4. That prior to June 7, 2002, Plaintiffs completed site work upon a piece or parcel of land owned by Mable McFarland, the mother of Plaintiff Vicki L. Bratton, which site

work was completed for the purpose of erecting the mobile home described in Paragraph 3 hereof upon the McFarland property.

5. The costs of all site work consisting of demolition, back filling and construction of footers was paid by Plaintiffs with the understanding that Mable McFarland was to reside with Plaintiffs in the mobile home described in Paragraph 3 hereof which is incorporated herein by reference.

6. That on June 7, 2002, Plaintiffs contacted Defendant, Leo J. Nelen, who agreed to move Plaintiffs' double wide mobile home onto the McFarland property for the sum of \$50.00 per hour.

7. That the Defendant, Leo J. Nelen, arrived at the McFarland property on June 10, 2002, at which time he was able to successfully place one-half of the double wide mobile home on the site location.

8. That while attempting to place the second half of the mobile home on the site location, Defendant destroyed all of the footers that had been constructed along one side of the McFarland property.

9. That in addition to demolishing the footers, Defendant Nelen caused the second half of the mobile home to buckle in half resulting in damages to the mobile home, the cost of which is in excess of the value of both halves of the mobile home.

10. That Defendant Nelen abandoned the damaged half of the mobile home, which at that time was left leaning against the mobile home of an adjoining property owner.

11. That Plaintiffs were required to expend the sum of \$300.00 to move the damaged portion of their mobile home from the property of the adjoining land owner.

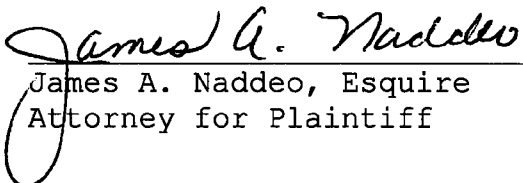
12. That Plaintiffs will be required to expend the sum of \$2,700.00 to reconstruct the footers damaged by Defendant.

13. That Plaintiffs will be required to expend the sum of \$4,000.00 to have both halves of their double wide mobile home removed from the premises and disposed of in an appropriate manner.

14. That the value to the mobile home including sales tax was \$10,600.00.

WHEREFORE, Plaintiff claims damages against Defendant in the amount of Seventeen Thousand Six Hundred (\$17,600.00) Dollars with interest thereon as allowable by law.

Respectfully submitted,


James A. Naddeo, Esquire
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA)

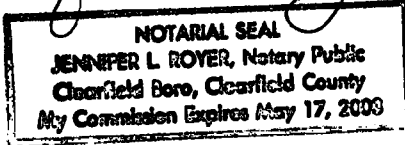
ss.

COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared VICKI L. BRATTON, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

Vicki L. Bratton
Vicki L. Bratton

SWORN and SUBSCRIBED before me this 25th day of June, 2002.

Jennifer L. Royer


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

Lap over margin

FILED
1cc Atty Naddeo
01/31/53
Atty pd. 80.00
6/1/53

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12856

BRATTON, BOBBY J. & VICKI L.

02-1186-CD

VS.

NELEN, LEO J.

COMPLAINT

SHERIFF RETURNS

NOW SEPTEMBER 5, 2002 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN
THE WITHIN COMPLAINT "NOT FOUND" AS TO LEO J. NELEN, DEFENDANT.
SEVERAL ATTEMPTS, NOT HOME.

Return Costs

Cost	Description
37.77	SHFF. HAWKINS PAID BY; ATTY.
10.00	SURCHARGE PAID BY; ATTY.

Sworn to Before Me This

5th Day Of *September* 2002
William A. Shaw

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

So Answers,

Chester A. Hawkins
by Marilyn Harris
Chester A. Hawkins
Sheriff

FILED

AS SEP 05 2002
011221 no ce
William A. Shaw
Prothonotary

JAMES A. NADDEO

ATTORNEY AT LAW

211 1/2 EAST LOCUST STREET

P.O. BOX 552

CLEARFIELD, PENNSYLVANIA 16830

CERTIFIED TRUE AND CORRECT COPY

James A. Naddeo

100-44361-100

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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No. 02 - - CD

NOTICE

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

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

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

(814) 765-2641

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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No. 02 - - CD

C O M P L A I N T

NOW COMES the Plaintiffs, BOBBY J. BRATTON and VICKI L. BRATTON, by their attorney, James A. Naddeo, Esquire, and set forth the following:

1. Plaintiffs, Bobby J. Bratton and Vicki L. Bratton, are married individuals who reside at 501 South Fourth Street, Apartment C, Clearfield, Pennsylvania 16830.

2. Defendant, Leo J. Nelen, is an adult individual who resides at RD1 Grampian, Pennsylvania 16838.

3. That at all times referred to herein, Plaintiffs were the owners of a certain double wide mobile home more particularly identified as a 1989 Liberty Mobile Home, VIN #08L60349XU.

4. That prior to June 7, 2002, Plaintiffs completed site work upon a piece or parcel of land owned by Mable McFarland, the mother of Plaintiff Vicki L. Bratton, which site

work was completed for the purpose of erecting the mobile home described in Paragraph 3 hereof upon the McFarland property.

5. The costs of all site work consisting of demolition, back filling and construction of footers was paid by Plaintiffs with the understanding that Mable McFarland was to reside with Plaintiffs in the mobile home described in Paragraph 3 hereof which is incorporated herein by reference.

6. That on June 7, 2002, Plaintiffs contacted Defendant, Leo J. Nelen, who agreed to move Plaintiffs' double wide mobile home onto the McFarland property for the sum of \$50.00 per hour.

7. That the Defendant, Leo J. Nelen, arrived at the McFarland property on June 10, 2002, at which time he was able to successfully place one-half of the double wide mobile home on the site location.

8. That while attempting to place the second half of the mobile home on the site location, Defendant destroyed all of the footers that had been constructed along one side of the McFarland property.

9. That in addition to demolishing the footers, Defendant Nelen caused the second half of the mobile home to buckle in half resulting in damages to the mobile home, the cost of which is in excess of the value of both halves of the mobile home.

10. That Defendant Nelen abandoned the damaged half of the mobile home, which at that time was left leaning against the mobile home of an adjoining property owner.

11. That Plaintiffs were required to expend the sum of \$300.00 to move the damaged portion of their mobile home from the property of the adjoining land owner.

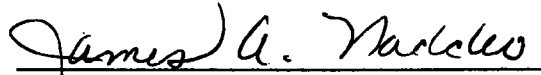
12. That Plaintiffs will be required to expend the sum of \$2,700.00 to reconstruct the footers damaged by Defendant.

13. That Plaintiffs will be required to expend the sum of \$4,000.00 to have both halves of their double wide mobile home removed from the premises and disposed of in an appropriate manner.

14. That the value to the mobile home including sales tax was \$10,600.00.

WHEREFORE, Plaintiff claims damages against Defendant in the amount of Seventeen Thousand Six Hundred (\$17,600.00) Dollars with interest thereon as allowable by law.

Respectfully submitted,


James A. Naddeo, Esquire
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA)

ss.

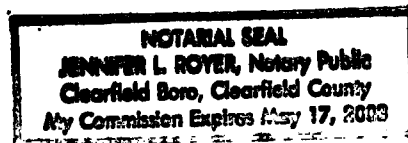
COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared VICKI L. BRATTON, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

Vicki L. Bratton
Vicki L. Bratton

SWORN and SUBSCRIBED before me this 25th day of June, 2002.

Jennifer L. Royer



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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

No. 02 - 1186 - CD

Type of Pleading:

**PRAECIPE TO REINSTATE
COMPLAINT**

Filed on behalf of:

Plaintiff

Counsel of Record for
this party:

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

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

FILED

OCT 04 2002

0/3:40/4
William A. Shaw
Prothonotary

No Cte. 7.00

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

OCT 04 2002

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

~~OCT 4 2002~~ Document
Reinstated/Released to Sheriff/Attorney
for service.

Deputy Prothonotary

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

No. 02 - 1186 - CD

Type of Pleading:

**PRAECIPE TO REINSTATE
COMPLAINT**

Filed on behalf of:

Plaintiff

Counsel of Record for
this party:

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

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

FILED

OCT 04 2002

0/3:40/6 (mp)
William A. Shaw
Prothonotary pp
No c/c 7.00

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

OCT 04 2002

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

~~OCT 4 2002~~ Document
Reinstated/Released to Sheriff/Attorney
for service.

[Signature]
Deputy Prothonotary

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.


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No. 02 - 1186 - CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

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



James A. Naddeo, Esquire
Attorney for Plaintiffs

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

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

**BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,**

Plaintiffs,

vs.

**LEO J. NELEN,
an individual,**

Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Defendant

Counsel of Record for this Party:

**Troy J. Harper
Supreme Court Number: 74753**

**John C. Dennison, II
Supreme Court Number: 29408**

**DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316**

FILED

OCT 30 2002

**William A. Shaw
Prothonotary**

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
*
* Number 2002 - 1186 C.D.

APPEARANCE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please enter our Appearance on behalf of the Defendant, LEO J. NELEN, in regard to the
above entitled matter.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: 10/29/02

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Appearance was served on the

29th day of October, 2002, by United States Mail, First Class,

Postage Prepaid, addressed to the following:

James A. Naddeo, Esq.
211 ½ E. Locust Street
P.O. Box 552
Clearfield, Pennsylvania 16830

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant

FILED

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OCT 30 2012

William A. Shaw
Prothonotary

NOV 11 2012
cc
KBS

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 19023

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

**BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,**

vs.

**LEO J. NELEN,
an individual,
Defendant.**

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Answer and New Matter

Filed on behalf of: Defendant

Counsel of Record for this Party:

**Troy J. Harper
Supreme Court Number: 74753**

**John C. Dennison, II
Supreme Court Number: 29408**

**DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316**

FILED 2002

**William A. Shaw
Prothonotary**

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
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*
* Number 2002 - 1186 C.D.

NOTICE TO PLEAD

TO: BOBBY J. BRATTON and VICKI L. BRATTON, PLAINTIFFS:

You are hereby notified to plead to the enclosed New Matter directed to you within
twenty (20) days from service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

**BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,**

vs.

**LEO J. NELEN,
an individual,
Defendant.**

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
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*
* Number 2002 - 1186 C.D.

ANSWER AND NEW MATTER

**AND NOW, comes the Defendant, LEO J. NELEN, by and through his attorneys,
Dennison, Dennison & Harper, who file the following Answer and New Matter in response to the
Plaintiffs' Complaint:**

1. Admitted.

2. Admitted.

**3. After reasonable investigation, the Defendant is without sufficient knowledge and
information to form a belief as to the truth of the averments of Paragraph 3 of the Plaintiffs'
Complaint, and said averments are therefore denied.**

**4. The averments of Paragraph 4 are admitted only insofar as that someone completed
site work upon a parcel of land where the double wide mobile home was going to be transported.
However, is believed and therefore averred that said site work was not done in accordance with
the applicable ordinances of Lawrence Township, Clearfield County. With respect to the
remaining averments of Paragraph 4 of the Plaintiffs' Complaint, after reasonable investigation,
the Defendant is without sufficient knowledge and information to form a belief as to the truth of**

the averments, and said averments are therefore denied.

5. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 5 of the Plaintiffs' Complaint, and said averments are therefore denied.

6. The averments of Paragraph 6 of the Plaintiffs' Complaint are denied as stated. On the contrary, on or about June 7, 2002, the Plaintiffs contacted the Defendant, Leo J. Nelen, about transporting a double wide mobile home from one site to a different site for the sum of \$50.00 per hour. However, the Defendant did not agree to place the double wide mobile home segments on the site for final erection.

7. With respect to the averments of Paragraph 7 of the Plaintiffs' Complaint alleging particular ownership of the property identified as the McFarland property, after reasonable investigation, the Defendant, Leo J. Nelen, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied. The remaining averments of Paragraph 7 are denied as stated. On the contrary, the Defendant transported one section of the double wide mobile home to the site at which time he was then directed to set that segment on the site per the specific directions and orders of the Plaintiffs. Further, the Defendant warned the Plaintiffs of potential damage to the site and the double wide mobile home due to the topography and obstructions at the site as constructed by the Plaintiffs.

8. The averments of Paragraph 8 of the Plaintiffs' Complaint are denied. On the contrary, the Defendant advised the Plaintiffs that he could not move the second section of the double wide mobile home into a position for final erection without moving the equipment and second section

of the double wide mobile home across the footers. The Defendant again advised the Plaintiffs of the potential damage to footers and the double wide mobile home itself and, despite said warnings, the Plaintiffs directed and ordered the Defendant to proceed to place the second section of the double wide mobile home as near as possible to the first section of the double wide mobile home. By way of additional response, it is believed and therefore averred that the site and footers were not constructed in accordance with the ordinances of Lawrence Township, Clearfield County, as a result of which the Plaintiffs knew or should have known it was likely that the movement of heavy equipment and double wide mobile home across the site would result in damage to and destruction of the footers.

9. With respect to any averments of Paragraph 9 of the Plaintiffs' Complaint alleging any costs of damages and value of the mobile home, after reasonable investigation, the Defendant, Leo J. Nelen, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied. The remaining averments of Paragraph 9 of the Plaintiffs' Complaint are denied. On the contrary, the Defendant advised the Plaintiffs that he could not place the second section of the double wide mobile home in position for final erection without the potential for damage to the site and to the double wide mobile home. As directed by the Plaintiffs, the Defendant moved the second section of the double wide mobile home as close as possible to the first section on the site and the Defendant told the Plaintiffs that the final placement should be done by others. Notwithstanding the Defendant's admonishment to the Plaintiffs, the Plaintiffs directed the Defendant to move the second section of the double wide mobile home as near as was physically possible to the first section of the double wide mobile

home.

10. The averments of Paragraph 10 of the Plaintiffs' Complaint are denied. On the contrary, the Defendant did not abandon the job but advised the Plaintiffs that they had to secure other equipment in order to finish moving the second section of the double wide mobile home into position to erect the double wide mobile home. In addition, the section of the double wide mobile home was not leaning against any other home. Further, it is believed and therefore averred that the Plaintiffs secured third parties to actually move the double wide mobile home in an attempt to put it into position to erect the double wide mobile home, which attempt caused severe damage to the double wide mobile home and the site.

11. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 11 of the Plaintiffs' Complaint, and said averments are therefore denied.

12. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 12 of the Plaintiffs' Complaint, and said averments are therefore denied. By way of additional response, the averments of Paragraph 8 of this Answer are incorporated herein by reference thereto.

13. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 13 of the Plaintiffs' Complaint, and said averments are therefore denied.

home.

10. The averments of Paragraph 10 of the Plaintiffs' Complaint are denied. On the contrary, the Defendant did not abandon the job but advised the Plaintiffs that they had to secure other equipment in order to finish moving the second section of the double wide mobile home into position to erect the double wide mobile home. In addition, the section of the double wide mobile home was not leaning against any other home. Further, it is believed and therefore averred that the Plaintiffs secured third parties to actually move the double wide mobile home in an attempt to put it into position to erect the double wide mobile home, which attempt caused severe damage to the double wide mobile home and the site.

11. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 11 of the Plaintiffs' Complaint, and said averments are therefore denied.

12. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 12 of the Plaintiffs' Complaint, and said averments are therefore denied. By way of additional response, the averments of Paragraph 8 of this Answer are incorporated herein by reference thereto.

13. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 13 of the Plaintiffs' Complaint, and said averments are therefore denied.

14. After reasonable investigation, the Defendant is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 14 of the Plaintiffs' Complaint, and said averments are therefore denied.

WHEREFORE, the Defendant, Leo Nelen, demands judgment in his favor and against the Plaintiffs.

NEW MATTER

15. The alleged damages sustained by the Plaintiffs, without admission of the same, were caused or contributed to, in whole or in part, by persons or entities other than the Defendant, Leo J. Nelen, and over whom the Defendant, Leo J. Nelen, had no control, and for whose actions the Defendant, Leo J. Nelen, is not liable.

16. The Plaintiffs failed to take proper and reasonable actions to mitigate and prevent damages, without admission of the same, to the double wide mobile home.

17. The Plaintiffs have failed to state a cause of action upon which relief may be granted.

WHEREFORE, the Defendant, Leo Nelen, demands judgment in his favor and against the Plaintiffs.

DENNISON, DENNISON & HARPER


By


Troy J. Harper

Attorneys for Defendant

VERIFICATION

I verify that the averments made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.


Leo J. Nelen

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer and New Matter was served on the 20th day of November, 2002, by United States Mail, First Class, Postage Prepaid, addressed to the following:

James A. Naddeo, Esq.
211 ½ E. Locust Street
P.O. Box 552
Clearfield, Pennsylvania 16830

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant

NO
cc
m/1:41
2017
REB

William A. Shaw
Prothonotary

Notary

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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No. 02 - 1186 - CD

ANSWER TO NEW MATTER

NOW COME the Plaintiffs, BOBBY J. BRATTON and VICKI L. BRATTON, by their attorney, James A. Naddeo, Esquire, and set forth the following Answer to Defendant's New Matter:

15. Denied. After reasonable investigation Plaintiffs are without knowledge or information sufficient to form a belief as to the truth of said averment.

16. States a conclusion to which no answer is required. To the extent that an answer may be required, said allegation is denied. On the contrary, it is alleged that the said mobile home was totally damaged by Defendant and could not be salvaged.

17. States a conclusion of law to which no answer is required.

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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No. 02 - 1186 - CD

ANSWER TO NEW MATTER

NOW COME the Plaintiffs, BOBBY J. BRATTON and VICKI L. BRATTON, by their attorney, James A. Naddeo, Esquire, and set forth the following Answer to Defendant's New Matter:

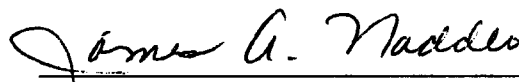
15. Denied. After reasonable investigation Plaintiffs are without knowledge or information sufficient to form a belief as to the truth of said averment.

16. States a conclusion to which no answer is required. To the extent that an answer may be required, said allegation is denied. On the contrary, it is alleged that the said mobile home was totally damaged by Defendant and could not be salvaged.

17. States a conclusion of law to which no answer is required.

WHEREFORE, Plaintiffs demand judgment as set forth in their Complaint.

Respectfully submitted,



James A. Naddeo, Esquire
Attorney for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA)

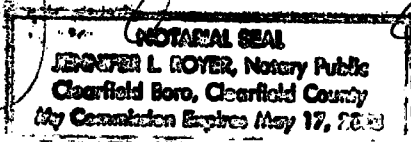
ss.

COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared VICKI L. BRATTON who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Answer are true and correct to the best of her knowledge, information and belief.

Vicki L. Bratton
Vicki L. Bratton

SWORN and SUBSCRIBED before me this 3rd day of December, 2002.

Jennifer L. Royer


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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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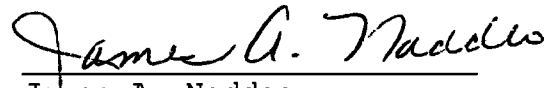
No. 02 - 1186 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and certified copy of Plaintiffs' Answer to New Matter filed in the above-captioned action was served on the following person and in the following manner on the 3rd day of December, 2002:

First-Class Mail, Postage Prepaid

Troy J. Harper, Esquire
DENNISON, DENNISON & HARPER
293 Main Street
Brookville, PA 15825


James A. Naddeo
Attorney for Plaintiffs

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

Lap over margin

1cc
Aug
6/3/80
EJ

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12856

BRATTON, BOBBY J. & VICKI L.

02-1186-CD

VS.

NELEN, LEO J.

COMPLAINT

SHERIFF RETURNS

NOW OCTOBER 17, 2002 AT 11:20 AM DST SERVED THE WITHIN COMPLAINT ON LEO J. NELEN, DEFENDANT AT SHERIFF'S OFFICE, MARKET ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LEO J. NELEN A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: DAVIS

Return Costs

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

Sworn to Before Me This

17th Day Of January 2003
William A. Shaw

So Answers,

Chester A. Hawkins
by Marilyn Hamer
Chester A. Hawkins
Sheriff

FILED

not 10 2:03 PM REC
JAN 17 2003

William A. Shaw
Prothonotary

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

BOBBY J. BRATTON and
VICKI L. BRATTON,
husband and wife,
Plaintiffs,

v.

LEO J. NELEN,
an individual,
Defendant.

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No. 02 - 1186 - CD

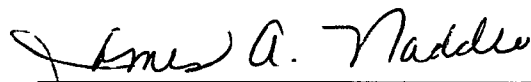
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, Attorney for Plaintiffs, do hereby certify that true and correct copies of the Notices of Deposition of Leo J. Nelen and James Stiles in the above matter were served by first-class mail, postage prepaid, upon the following:

Troy J. Harper, Esquire
DENNISON, DENNISON & HARPER
293 Main Street
Brookville, PA 15825

ASAP Court Reporting
P.O. Box 345
Ebensburg, PA 15931

Said Notice of Deposition was mailed this 11th day of February, 2003.



James A. Naddeo, Esquire
Attorney for Plaintiffs

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

Lap over margin

102
J. J. Naddo
C/O 4/3/54
Ket

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
MAR 07 2003
mll:10/nocc
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER

293 Main Street

Brookville, Pennsylvania 15825

(814) 849-8316

FILED
MAR 07 2003
mjl:lo/noc
William A. Shaw
Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,
Defendant.

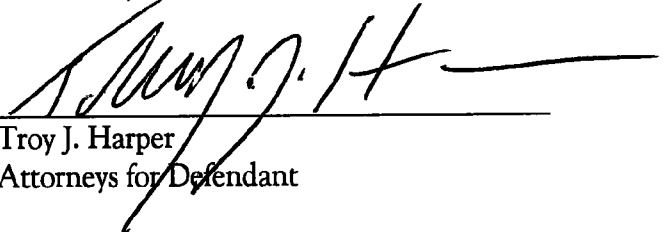
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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*
* Number 2002 - 1186 C.D.

NOTICE OF DEPOSITION

TO: Vicki Bratton
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Vicki Bratton will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 11:15 o'clock a.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

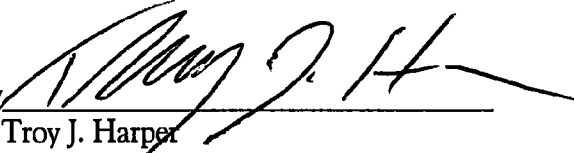
By 
Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15223

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003

mll:10/nocc
William A. Shaw

Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2002 - 1186 C.D.

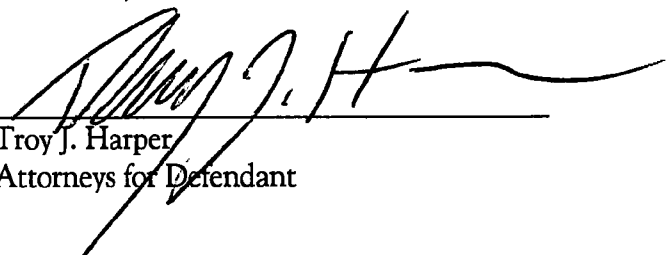
NOTICE OF DEPOSITION

TO: Bobby Bratton
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Bobby Bratton will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 10:30 o'clock a.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By

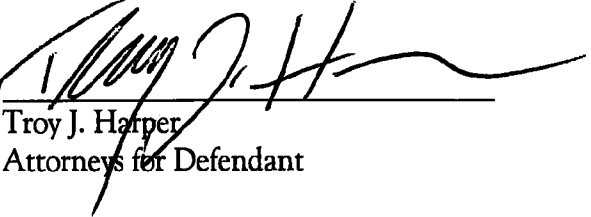

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003

mjl:10)noc

William A. Shaw

Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

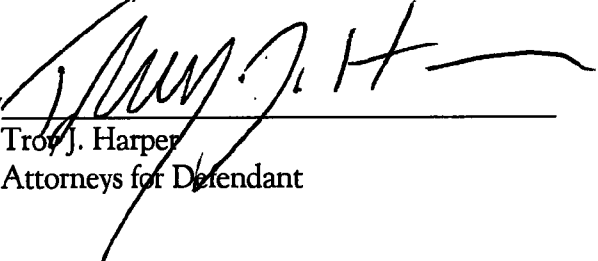
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2002 - 1186 C.D.

NOTICE OF DEPOSITION

TO: Kenneth Coder
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Kenneth Coder will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 12:15 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

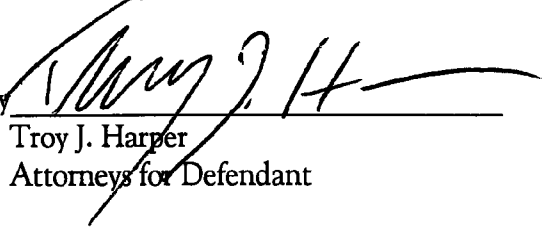
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

File

MAR 07 2003
m/j:10/nsc
William A. Shaw
Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2002 - 1186 C.D.

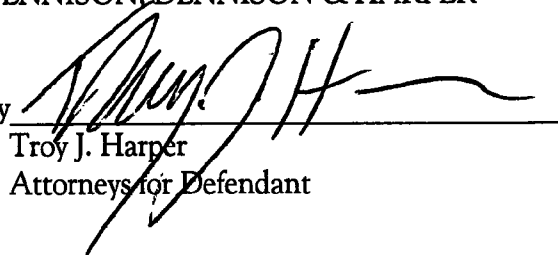
NOTICE OF DEPOSITION

TO: Kenneth Coder, II
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Kenneth Coder, II, will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 12:45 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

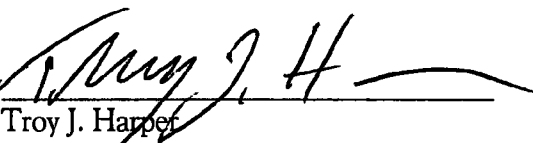
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

203 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003

William A. Shaw

Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

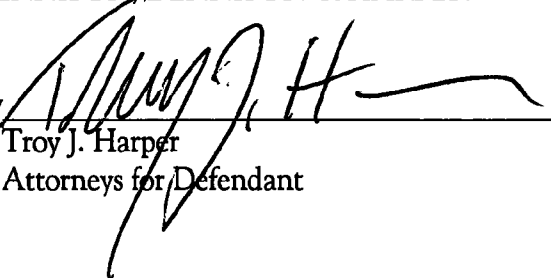
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
* Number 2002 - 1186 C.D.

NOTICE OF DEPOSITION

TO: Ernie McFarland
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Ernie McFarland will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 1:15 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

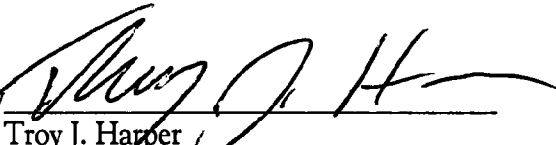
By 
Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

233 MAIN STREET

BROOKVILLE, PENNSYLVANIA 15315

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003 ^E
mll:lo/noc
William A. Shaw
Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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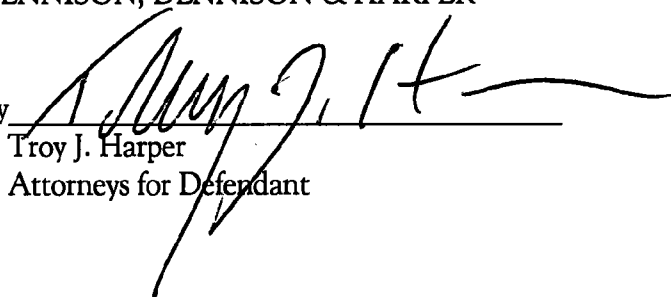
NOTICE OF DEPOSITION

TO: Tina McFarland
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Tina McFarland will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 1:45 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

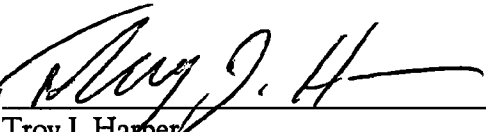
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

203 MAIN STREET

BROOKVILLE, PENNSYLVANIA 18835

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003

William A. Shaw

Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2002 - 1186 C.D.

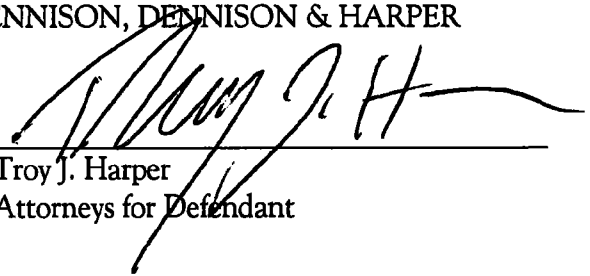
NOTICE OF DEPOSITION

TO: Brian Owens
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Brian Owens will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 2:15 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By

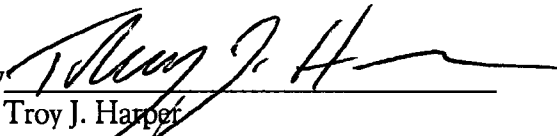

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

293 MAIN STREET

BROOKVILLE, PENNSYLVANIA 19025

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED 

MAR 07 2003
mli: jolnol
William A. Shaw
Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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*
* Number 2002 - 1186 C.D.

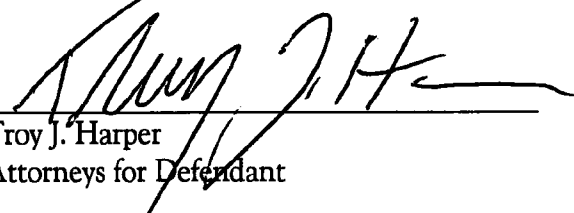
NOTICE OF DEPOSITION

TO: Rick Rauch
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Rick Rauch will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 2:45 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

By

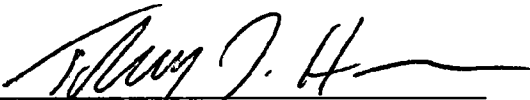

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

283 MAIN STREET

BROOKVILLE, PENNSYLVANIA 18825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BOBBY J. BRATTON and
VICKI L. BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN,
an individual,
Defendant.

CIVIL ACTION - LAW

Number 2002 - 1186 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAR 07 2003
mll:lo/noc
William A. Shaw
Prothonotary/Clerk of Courts

BOBBY J. BRATTON and VICKI L.
BRATTON, husband and wife,
Plaintiffs,

vs.

LEO J. NELEN, an individual,

Defendant.


* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
* Number 2002 - 1186 C.D.

NOTICE OF DEPOSITION

TO: Richard Smith
c/o James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

Take notice that the deposition of Richard Smith will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on the 31st day of March, 2003, at 3:15 o'clock p.m. at the offices of James A. Naddeo, 211-1/2 East Locust Street, Clearfield, Pennsylvania, 16830, at which time and place you are invited to appear and take such part as shall be fitting and proper.

DENNISON, DENNISON & HARPER

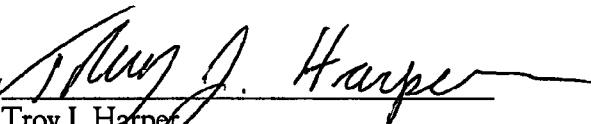
By 
Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 6th day of March, 2003, by United States Mail, First Class, postage prepaid, addressed to the following:

James A. Naddeo, Esq.
211-1/2 East Locust Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

William A. Shaw
Prothonotary/Clerk of Courts

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

BOBBY J. BRATTON and *
VICKI L. BRATTON, *
husband and wife, *
Plaintiffs, *

v. *

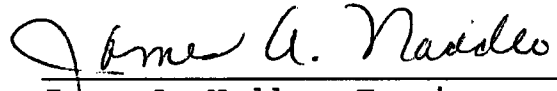
No. 02 - 1186 - CD

LEO J. NELEN, *
an individual, *
Defendant. *

PRAECIPE TO SETTLE AND DISCONTINUE

To the Prothonotary:

Please mark the above-captioned case settled and
discontinued.



James A. Naddeo, Esquire
Attorney for Plaintiffs

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

Lap over margin

FILED
CL 8:41/2003
SEP 18 2003
W. JAMES A. NADDEO
PROCTOR, JAMES A. NADDEO
Copy to C/A
cc
Cert. of Disc.
to Atty
free

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

CIVIL DIVISION

**Bobby J. Bratton and
Vicki L. Bratton, husband
and wife**

**Vs.
Leo J. Nelen, an individual**

No. 2002-01186-CD

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on September 18, 2003, marked:

Settled and Discontinued

Record costs in the sum of \$87.00 have been paid in full by James A. Naddeo, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 18th day of September A.D. 2003.

William A. Shaw, Prothonotary

DENNISON, DENNISON & HARPER

ATTORNEYS AT LAW

263 MAIN STREET

BROOKVILLE, PENNSYLVANIA 18231