

02-1189-CD
Susan Snyder and Brian Snyder vs Anna Irene Hepfer

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CO

Plaintiffs
vs.

ANNA IRENE HEPFER,

Defendant

Filed on behalf of:
PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE
E-mail address:
gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC
100 West High Street
Ebensburg, PA 15931-1539

(814) 472-9000

FILED

JUL 31 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CD

Plaintiffs

vs.

ANNA IRENE HEPFER,

Defendant

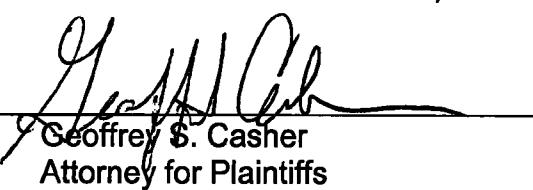
PRAECIPE FOR WRIT OF SUMMONS
IN A CIVIL ACTION

TO: William A. Shaw, Prothonotary

Kindly issue a Writ Of Summons In A Civil Action in the within matter directed against the Defendant, ANNA IRENE HEPFER, whose last known address is 644 Filbert Street, Curwensville, Clearfield County, Pennsylvania 16833.

EDGAR SNYDER & ASSOCIATES, LLC

By


Geoffrey S. Casher
Attorney for Plaintiffs

FILED

JUL 31 2002

Millionatty Cash
William A. Shaw PO 80.00
Prothonotary

I Writ Sheriff
no cc



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

SUMMONS

**Susan Snyder and
Brian Snyder**

Vs.

NO.: 2002-01189-CD

Anna Irene Hepfer

**TO: ANNA IRENE HEPFER
644 Filbert Street
Curwensville, PA 16833**

**To the above named Defendant you are hereby notified that the above named Plaintiffs
have commenced a Civil Action against you.**

Date: 07/31/2002

**William A. Shaw
Prothonotary**

**Issuing Attorney:
Geoffrey S. Casher, Esquire
100 West High Street
Ebensburg, PA 15931
(814) 472-9000**

,

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D. *02*
:
Plaintiffs, : TYPE OF PLEADING:
: PRAECIPE FOR ENTRY OF
: APPEARANCE
:
v. :
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: DEFENDANT
:
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

AUG 15 2002

11:05 a.m. Copy CA
William A. Shaw
Prothonotary *EAS*

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.

Plaintiffs, :

v. :

ANNA IRENE HEPFER, :

Defendant. :

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, Anna Irene Hepfer, in the above-captioned matter.

We are authorized to accept service on behalf of Anna Irene Hepfer.

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

Dated: August 13, 2002

By: _____

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant

811 University Drive

State College, PA 16801

(814) 238-4926

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praeclipe for Entry of Appearance on
behalf the Defendant, in the above-captioned matter was mailed by U.S. First Class Mail, postage
prepaid, on this 12th day of August, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

SUSAN SNYDER and BRIAN SNYDER, : *02*
: No. 00-1189-C.D.
Plaintiffs, :
: TYPE OF PLEADING:
: Certificate of Service
v. :
ANNA IRENE HEPFER, :
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
Defendant. : DEFENDANT
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

SEP 04 2002

310:47/nocc
William A. Shaw
Prothonotary

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

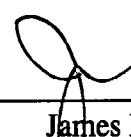
SUSAN SNYDER and BRIAN SNYDER, : ⁰² No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Interrogatories Propounded by Defendant for Answer By Plaintiffs (One) and Request for Production (Set One) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 3rd day of September, 2002, to the attorney of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

02

SUSAN SNYDER and BRIAN SNYDER,	:	No. 00-1189-C.D.
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
ANNA IRENE HEPFER,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Second Request For Production of Documents and Tangible Things By Defendant Directed to Plaintiffs in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 3rd day of September, 2002, to the attorney of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

O2

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, : TYPE OF PLEADING:
v. : PRAECIPE FOR RULE TO FILE
Defendant. : COMPLAINT
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: DEFENDANT
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

SEP 04 2002

mllo:sh/nocc (D Rule
William A. Shaw
Prothonotary
to attorney
KCA

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.

:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

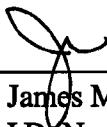
PRAECIPE FOR RULE TO FILE COMPLAINT

TO THE PROTHONOTARY:

Please issue a Rule on Plaintiffs to file their Complaint within twenty (20) days from service thereof or suffer a judgment of non pros against them.

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

Dated: September 3, 2002

By: 

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant

811 University Drive

State College, PA 16801

(814) 238-4926

COPY

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

R U L E

To: Susan Snyder and Brian Snyder
% Geoffrey S. Casher, Esquire

YOU ARE HEREBY RULED to file a Complaint in the above captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.



William Shaw, Prothonotary
[SEAL]

Dated: September 4, 2002

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

SUSAN SNYDER and BRIAN SNYDER, : *02* No. 00-1189-C.D.

Plaintiffs, :

v. :

ANNA IRENE HEPFER, :

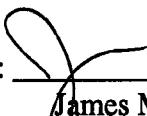
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praeclipe for Rule to File Complaint on behalf the Defendant, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 3rd day of September, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

SEP 04 2002

mjl/11.01/02 *er*
William A. Shaw *KA*
Prothonotary

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

02

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, : TYPE OF PLEADING:
: Certificate of Service
v. :
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
Defendant. : FILED ON BEHALF OF:
: DEFENDANT
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

SEP 04 2002

7/11/02
William A. Shaw
Prothonotary

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

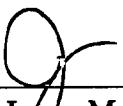
SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery directed to Clearfield Hospital, Dr. Amer S. Khouri, Dr. Carroll P. Osgood, Henninger Dental, Clearfield Family Eye Care, Dr. Ralph Cardamone, Dr. Michael T. Dotsey, Geisinger Medical Center, Presque Isle Insurance Division, and Clearfield County Career and Technology Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 3 day of September, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

02

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, :
: TYPE OF PLEADING:
: Certificate of Service
v. :
ANNA IRENE HEPFER, :
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: DEFENDANT
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

FILED

SEP 09 2002

10:50 AM
William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
: *oz*
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the issued Rule to file Complaint on behalf of the Defendant, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 5th day of September, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: _____


James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12855

SNYDER, SUSAN & BRIAN

02-1189-CD

VS.

HEPFER, ANNA IRENE

PRAECIPE & SUMMONS

SHERIFF RETURNS

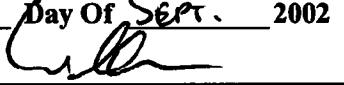
NOW AUGUST 6, 2002 AT 10:40 AM DST SERVED THE WITHIN PRAECIPE & SUMMONS ON ANNA IRENE HEPFER, DEFENDANT AT RESIDENCE, 644 FILBERT ST., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO TIMOTHY HEPFER, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE & SUMMONS AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: MORGILLO

Return Costs

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

Sworn to Before Me This

20 Day Of SEPT. 2002


So Answers,


Chester A. Hawkins
Sheriff

FILED

SEP 20 2002
2:30
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CD

Plaintiffs

vs.

ANNA IRENE HEPFER,

Defendant

Filed on behalf of:
PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE
E-mail address:
gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC
100 West High Street
Ebensburg, PA 15931-1539

(814) 472-9000

FILED

SEP 24 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CD

Plaintiffs

vs.

ANNA IRENE HEPFER,

Defendant

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, 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 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 OR KNOW A LAWYER, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

LAWYER REFERRAL SERVICE

-

Court Administrator's Office
1 North Second Street
Clearfield, PA 16830

Telephone (814) 765-2641, Ext: 50

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CD

Plaintiffs

vs.

ANNA IRENE HEPFER,

Defendant

COMPLAINT IN A CIVIL ACTION

AND NOW, come the Plaintiffs, SUSAN SNYDER and BRIAN SNYDER, husband and wife, by and through their attorneys, EDGAR SNYDER & ASSOCIATES, LLC, and GEOFFREY S. CASHER, ESQUIRE, to make complaint against the Defendant, ANNA IRENE HEPFER, upon cause whereof, the following is a statement:

1. The Plaintiffs, SUSAN SNYDER and BRIAN SNYDER, are adult, married individuals who reside at R. R. #4, Apartment C7, Edgewood Apartments, Clearfield, Pennsylvania 16830.
2. The Defendant, ANNA IRENE HEPFER, is an adult individual who resides at 644 Filbert Street, Curwensville, Clearfield County, Pennsylvania 16833.
3. On or about November 22, 2000, SUSAN SNYDER was a passenger in a motor vehicle driven by BRIAN KEITH SNYDER of R. R. #4, Apartment C7, Edgewood Apartments, Clearfield, Pennsylvania 16830. Said vehicle was a 1990 Astro Chevrolet

owned by Faye J. Snyder. Said vehicle was traveling north along a road commonly called Nicholson Road, T513, in Pike Township, Clearfield County, Pennsylvania.

4. At or about the same time and place mentioned above, the Defendant, ANNA IRENE HEPFER, was traveling south along Nicholson Road, T513, while negotiating a right hand turn in the road, lost control of her vehicle, crossed over into the lane of travel of the vehicle in which the Plaintiff was riding, and struck the front and right front of the Plaintiff's vehicle.

Count I
Susan Snyder vs. Anna Irene Hepfer

5. The Plaintiffs incorporate herein, by reference, paragraphs one through four, inclusive as if the same were fully set forth at length herein.

6. The aforesaid accident and injuries sustained by the Plaintiff, SUSAN SNYDER, were a direct and proximate result of the negligence, carelessness, wantonness, and recklessness of the Defendant, ANNE IRENE HEPFER, as follows:

- a. in traveling at an excessive and dangerous rate of speed under the circumstances then and there existing;
- b. in failing to keep careful and adequate lookout for the other vehicles on the roadway, including that of the vehicle in which the Plaintiff was riding;
- c. in operating her vehicle in a direction toward the vehicle in which the Plaintiff was riding, when she knew or should have known that to do so would result in a collision;
- d. in failing to honk, warn, signal, flash her lights, or in any other way notify the Plaintiff of the impending collision;
- e. in failing to maintain her vehicle in a safe and proper working condition, such that her failure to do so would result in the vehicle being a hazard and unsafe;
- f. in operating her vehicle in such a mental or physical condition that it was unsafe to do so;

- g. in failing to maintain the assured clear distance, and/or operating her vehicle in such a rate of speed that she was unable to bring her vehicle to a stop within an assured clear distance ahead;
- h. in failing to observe the vehicle in which the Plaintiff was riding;
- i. in failing to yield the right of way;
- j. in failing to keep a safe and careful observation of the vehicles approaching her in the opposite lane of traffic;
- k. in operating her vehicle in a safe and proper manner, such as to cause it to go over the center line of the roadway and striking the vehicle in which the Plaintiff was a passenger;
- l. in failing to remain in her designated lane of travel, with such knowledge of the fact that such failure could result in serious or permanent injury to the Plaintiff;
- m. in failing to take all reasonable measures to avoid colliding with or leaving the road surface;
- n. negligence in allowing her vehicle to cross the center line, or center of roadway;
- o. in driving while drunk or intoxicated; and,
- p. in violating §3731 of the Pennsylvania Motor Vehicle Code, pertaining to driving under the influence of alcohol or controlled substance.

7. As a direct and proximate result of the aforesaid accident, the Plaintiff, SUSAN SNYDER, suffered the following injuries, some or all of which are permanent in nature:

- a. mental anxiety and nightmares;
- b. post-traumatic stress;
- c. bi-lateral lower leg edema;
- d. paresthesia/tingling to legs;
- e. contusions and hematoma, right and left legs;
- f. bi-lateral leg pain;

- g. cellulitis;
- h. low back pain (lumbago);
- i. headaches; and
- j. fatigue.

8. The Plaintiff, SUSAN SNYDER, is entitled to non-economic damages allowed under the Pennsylvania law, in that she is entitled to full tort option under the Pennsylvania Motor Vehicle Code.

9. As a further direct and proximate result of the aforesaid accident, the Plaintiff, SUSAN SNYDER, has been and will be obliged to receive and undergo medical attention and care, and to expend various sums of money and to incur various expenses, which expenses have or may exceed the sums recoverable under the limits of 75 Pa. C.S.A. §1711, and may be obliged to expend such sums or incur such expenditures for an indefinite time into the future.

10. As a further direct and proximate result of the aforesaid accident, the Plaintiff has suffered economic losses as a result of the Plaintiff not being able to return to her course of studies and has incurred losses as a result, by way of loss of income, and impairment of earning capacity. Additionally, she has lost tuition and other costs associated with the Practical Nursing Program she was enrolled in at the time of the accident.

11. As a result of the accident, Plaintiff, SUSAN SNYDER, has suffered severe physical pain, mental anguish, humiliation, embarrassment, loss of enjoyment of life, loss of vitality, vigor, health, and/or strength, and may continue to suffer the same for an indefinite time into the future.

WHEREFORE, the Plaintiff, SUSAN SNYDER, demands judgment in her favor

against the Defendant, ANNA IRENE HEPFER, in an amount not in excess of the statutory arbitration limits.

ARBITRATION IS HEREBY DEMANDED

Count II
Punitive Damages
Susan Snyder vs. Anna Irene Hepfer

12. The Plaintiff hereby incorporates paragraphs one through eleven, by reference, as if same were fully set forth herein.

13. The Defendant, ANNA IRENE HEPFER, knowingly and intentionally drank alcohol until she became intoxicated.

14. At the time of the motor vehicle accident, the Defendant, ANNA IRENE HEPFER, knowingly and intentionally operated a vehicle while she was intoxicated.

15. At the time of the motor vehicle accident, the Defendant, ANNA IRENE HEPFER, knowingly and intentionally operated a motor vehicle when she knew she had drunk so much alcohol that she was unable to properly or safely operate said vehicle.

16. The Defendant, ANNA IRENE HEPFER, knowing an intentional consumption of alcoholic beverages until she became drunk, and knowing an intentional operation of a vehicle when she was intoxicated, was a direct and proximate result of the motor vehicle collision as aforesaid.

17. The Defendant's conduct is outrageous, reckless, and wanton, and warrants imposition of punitive damages.

WHEREFORE, the Plaintiff, SUSAN SNYDER, hereby demands punitive damages against the Defendant, ANNA IRENE HEPFER, in amounts not in excess of the statutory arbitration limits.

ARBITRATION IS HEREBY DEMANDED

Count III
Brian Snyder vs. Anna Irene Snyder

18. The Plaintiff incorporates herein, by reference, paragraphs one through seventeen, inclusive, as if the same were fully set forth at length herein.

19. From the time of the accident to the present, the Plaintiffs were residing together as husband and wife.

20. As a direct and proximate result of the disabling injuries to the Wife-Plaintiff, the Husband-Plaintiff has been deprived of the services, society, and consortium of his wife.

WHEREFORE, the Plaintiff, BRIAN SNYDER, demands judgment of the Defendant, not in excess of the applicable arbitration limits.

ARBITRATION IS HEREBY DEMANDED.

Respectfully submitted:

EDGAR SNYDER & ASSOCIATES, LLC



Geoffrey S. Casner
Counsel for Plaintiffs

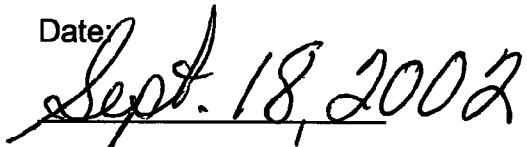
VERIFICATION

I, SUSAN SNYDER, Plaintiff herein, hereby verify that the averments of fact contained in the foregoing Complaint in a Civil Action are true and correct and based upon my personal knowledge, information or belief. I understand that these averments of fact are made subject to the penalties of 18 Purdon's Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.



Susan R. Snyder
Susan Snyder

Date:



Sept. 18, 2002

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Complaint was served on all Counsel listed below, by First Class Mail, postage prepaid, on this 23rd day of September, 2002:

James M. Horne, Esquire
McQUAIDE BLASKO
811 University Drive
State College PA 16801-6699

EDGAR SNYDER & ASSOCIATES, LLC


Geoffrey S. Casher
Attorney for Plaintiffs

FILED NO
M 11:19 AM CC
SEP 24 2002
EJK

William A. Shaw
Prothonotary

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

02-1189

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, :
v. : TYPE OF PLEADING:
ANNA IRENE HEPFER, : Certificate Prerequisite to
Defendant. : Service of Subpoenas
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: DEFENDANT
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

F I L E D

SEP 25 2002

William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

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

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) no objection to the Notice of Intent has been received, and,
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: September 25, 2002

By: _____

James M. Horne, Esquire
ID. No. 26908
Attorneys for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.

Plaintiffs, :

v. :

ANNA IRENE HEPFER, :

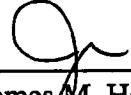
Defendant. :

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

Defendant intends to serve subpoenas identical to those attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

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

Date: September 3, 2002

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: *Clearfield Hospital*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: Amer S. Khouri, M.D.

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: *Carroll P. Osgood, M.D.*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: Henninger Dental

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical/dental records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, :
v. :
ANNA IRENE HEPFER, :
Defendant. :
:

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

TO: Clearfield Family Eye Care

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: Ralph A. Cardamone, M.D.

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: Michael T. Dotsey, M.D.

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs, :
v. :
ANNA IRENE HEPFER, :
Defendant. :
:

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

TO: Geisinger Medical Center

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: Presque Isle Insurance Division

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records including, but not limited to, workers' compensation records, in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70. Your Reference No.: 7051 WC JN.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
Plaintiffs,

v.

ANNA IRENE HEPFER, :
Defendant.

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

TO: *Clearfield County Career and Technology Center
(Practical Nursing Program)*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

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

SUSAN SNYDER and BRIAN SNYDER, : No. 00-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

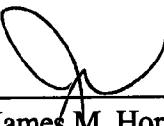
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Prerequisite to Service of Subpoenas to Produce Documents and Things for Discovery directed to Clearfield Hospital, Dr. Amer S. Khouri, Dr. Carroll P. Osgood, Henninger Dental, Clearfield Family Eye Care, Dr. Ralph Cardamone, Dr. Michael T. Dotsey, Geisinger Medical Center, Presque Isle Insurance Division, and Clearfield County Career and Technology Center, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 25th day of September, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: _____


James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

PP 100-110
SERIAL NO
SEP 25 2004

William A. Shaw
Prothonotary

02-1189-CD

NOTICE OF SERVICE OF INTERROGATORIES
AND REQUEST FOR PRODUCTION DIRECTED TO DEFENDANT[S]

I hereby certify that on this 30th day of September, 2002, the original Interrogatories Directed To Defendant[s], the original Request For Production, and one (1) copy of the Notice of Service of Interrogatories and Request For Production were mailed by First Class Mail, postage prepaid, to counsel for Defendant[s] at the following address:

James M. Horne, Esquire
McQUAIDE BLASKO
811 University Drive
State College PA 16801-6699

EDGAR SNYDER & ASSOCIATES, LLC

By Geoffrey S. Casper
Geoffrey S. Casper
Attorney for Plaintiffs

FILED

NO
M113681 CC
OCT 02 2002

E
GSC

William A. Shaw
Prothonotary

Attorney Geoffrey S. Casher
E-mail: gcasher@edgarsnyder.com

Other Offices In: Pittsburgh
Altoona • Erie • Johnstown

September 30, 2002

William A. Shaw, Prothonotary
Clearfield County Courthouse
1 North Second Street
Clearfield PA 16830

Re: SUSAN SNYDER and BRIAN SNYDER vs. ANNA IRENE HEPFER
Docket No: 02-1189-CD
Our File No: 314134

Dear Mr. Shaw:

Please find enclosed for filing in the above matter Notice of Service of Interrogatories and Request for Production. As indicated by the Notice of Service, a true and correct copy has been sent to all counsel of record.

Thank you in advance for your anticipated attention to this matter.

Very truly yours,

Geoffrey S. Casher

Geoffrey S. Casher

GSC/pjm
Enclosure

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
Plaintiffs, : TYPE OF PLEADING:
v. : **Answer with New Matter**
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
Defendant. : FILED ON BEHALF OF:
 : **DEFENDANT**
 :
 : COUNSEL OF RECORD FOR
 : FOR THIS PARTY:
 : JAMES M. HORNE, ESQ.
 : I.D. NO. 26908
 : KATHERINE V. OLIVER, ESQ.
 : I.D. NO. 77069
 : McQUAIDE, BLASKO, SCHWARTZ,
 : FLEMING & FAULKNER, INC.
 : 811 University Drive
 : State College, PA 16801
 : PH# (814) 238-4926
 : FAX#(814) 238-9624

OCT 14 2002
M/2:30 PM
William A. Shaw
Prothonotary
No. C/C EGT

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

NOTICE TO PLEAD

TO: Susan Snyder and Brian Snyder
% Geoffrey S. Casher, Esquire

YOU ARE HEREBY notified to plead to the within New Matter within twenty (20) days
from the date of service hereof or a default judgment may be entered against you.

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

Dated: October 11, 2002

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

ANSWER WITH NEW MATTER OF DEFENDANT, ANNA IRENE HEPFER

(1) After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments of paragraph 1. The same are therefore denied and strict proof thereof demanded.

(2) Admitted.

(3) Admitted.

(4) Admitted in part and denied in part. It is admitted that Defendant was at the time and place alleged traveling in southerly direction. It is further admitted that the front of the vehicle operated by Defendant came into contact with the front of the vehicle in which Plaintiff Susan Snyder was a passenger, and that said contact occurred at or about the time that Defendant encountered a right hand turn in the roadway. The balance of the allegations of paragraph 4 are denied pursuant to Pa.R.C.P. No. 1029(e).

Count I
Susan Snyder v. Anna Irene Hepfer

(5) Defendant incorporates herein by reference, the same as though set forth at length, her responses to paragraphs (1) through (4), inclusive.

(6) (a) - (p) The allegations of paragraphs 6(a) through (p), inclusive, are denied pursuant to Pa.R.C.P. No. 1029(e), with the exception that Defendant admits having entered a guilty plea in connection with certain charges brought against her as a result of the accident at issue.

(7) (a) - (j) After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 7 (a) through (j). The same are therefore denied and strict proof thereof demanded.

(8) - (11) After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments of paragraphs 8 through 11, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Anna Irene Hepfer requests that the complaint of Plaintiff Susan Snyder be dismissed, with prejudice and costs of suit.

Count II - Punitive Damages
Susan Snyder v. Anna Irene Hepfer

(12) Defendant hereby incorporates by reference, the same as though set forth at length, her responses to paragraphs (1) through (11), inclusive.

(13) - (17) The allegations of paragraphs 13 through 17, inclusive are denied. While Defendant does admit having consumed alcohol, and while Defendant pled guilty to certain charges brought against her as a result of the accident, she did not intentionally operate her vehicle in an intoxicated state, nor did she intend to act in such a manner as to cause harm to anyone. Defendant attempted to safely and properly operate her motor vehicle at or about the date, time and place in question. Defendant denies that her conduct was outrageous, reckless and wanton, and denies that punitive damages should be assessed in this case.

WHEREFORE, Defendant Anna Irene Hepfer requests that Plaintiff Susan Snyder's request for punitive damages be dismissed, with prejudice and costs of suit.

Count III
Brian Snyder v. Anna Irene Snyder

(18) Defendant incorporates herein by reference, the same as though set forth at length, her responses to paragraphs (1) through (17), inclusive.

(19) - (20) After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments of paragraphs 19 and 20, inclusive. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Anna Irene Hepfer requests that the complaint of Plaintiff Brian Snyder be dismissed, with prejudice and costs of suit.

New Matter

(21) Defendant hereby asserts and raises all those defenses and/or limitations on damages available to her by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

(22) To the extent Plaintiff's medical expenses, if any, have been paid or are payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

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

(24) Plaintiff's damages, if any, are the result in whole or in part of injuries and/or condition unrelated to the accident at issue.

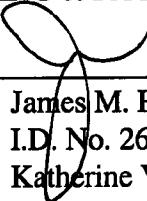
(25) Plaintiff's damages, if any, are the result of conditions which pre-existed the accident at issue.

WHEREFORE, Defendant Anna Irene Hepfer requests that the complaint of Plaintiffs Susan and Brian Snyder be dismissed, with prejudice and costs of suit.

Respectfully submitted,

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

Dated: October 11, 2002

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

VERIFICATION

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

Anna Irene Hepfer
ANNA IRENE HEPFER

Dated: 10-3-02, 2002

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

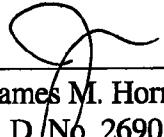
SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answer with New Matter to Plaintiffs' Complaint, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 11th day of October, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN
SNYDER,

No. 02-1189-CD

Plaintiffs

REPLY TO NEW MATTER

vs.

ANNA IRENE HEPFER,

Defendant

Filed on behalf of:
PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE
E-mail address:
gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC
100 West High Street
Ebensburg, PA 15931-1539

(814) 472-9000

FILED
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William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN SNYDER, No. 02-1189-CD

Plaintiffs

vs.

ANNA IRENE HEPFER,

Defendant

REPLY TO NEW MATTER

AND NOW, comes forth the Plaintiffs, SUSAN SNYDER and BRIAN SNYDER, by and through their attorneys, EDGAR SNYDER & ASSOCIATES, LLC, and GEOFFREY S. CASHER, ESQUIRE, and files the within Reply to New Matter and avers as follows:

21. Denied as stated. This is a conclusion of law to which no response is required. To the extent a response is required, all allegations that the Defendant has defenses and/or limitations of damages available to the defense are denied.

22. Denied. This is a conclusion of law to which no response is required. To the extent a response is required, all allegations that the Defendant has defenses and/or limitations of damages available to the defense are denied.

23. Denied. This is a conclusion of law to which no response is required. To the extent a response is required, all allegations that the Defendant has defenses and/or limitations of damages available to the defense are denied.

24. Denied. The Plaintiffs' damages as pled are wholly the result of the injuries

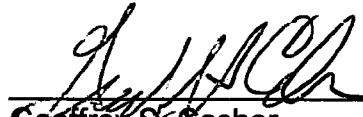
suffered as a result of the accident at issue. To the extent that the Plaintiff suffered any injuries that were unrelated to the accident at issue, it is hereby asserted that they do not substantially alter in whole or in part the injuries or condition of the Plaintiff.

25. Denied. These are conclusions to which no response is required. To the extent a response is required, all allegations that the Plaintiffs' damages are the result of her pre-existing condition are denied.

WHEREFORE, the Plaintiff requests that judgment be entered against the Defendant, together with costs.

Respectfully submitted:

EDGAR SNYDER & ASSOCIATES, LLC



Geoffrey S. Gasher
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Reply to New Matter was served on all Counsel listed below, by First Class Mail, postage prepaid, on this 21st day of October, 2002:

James M. Horne, Esquire
McQUAIDE BLASKO
811 University Drive
State College PA 16801-6699

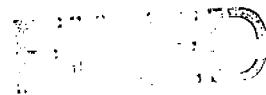
EDGAR SNYDER & ASSOCIATES, LLC



Geoffrey S. Casher
Attorney for Plaintiffs

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
: :
Plaintiffs, : TYPE OF PLEADING:
: Certificate of Service
: :
v. :
: :
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
Defendant. : DEFENDANT
: :
: :
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: CHENA L. GLENN-HART, ESQ.
: I.D. NO. 82750
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624



OCT 31 2002

William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
: :
Plaintiffs, : :
: :
v. : :
: :
ANNA IRENE HEPFER, : :
: :
Defendant. : :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy Defendant's Answers to Plaintiffs' First Set of Interrogatories and Responses to Plaintiffs' First Request for Production of Documents in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 30th day of October, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: Chena L. Glenn-Hart
James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
Plaintiffs, : TYPE OF PLEADING:
: Certificate of Service
v. :
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
Defendant. : FILED ON BEHALF OF:
: DEFENDANT
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: CHENA L. GLENN-HART, ESQ.
: I.D. NO. 82750
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

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William A. Shaw
Prothonotary

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

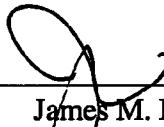
SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
: :
Plaintiffs, : :
: :
v. : :
: :
ANNA IRENE HEPFER, : :
: :
Defendant. : :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy Defendant's Notices of Depositions of Plaintiffs in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 9th day of December, 2002, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN
SNYDER, 02
No. 00-1189-C.D.

Plaintiffs

v.

ANNA IRENE HEPFER,

Defendant

NOTICE OF SERVICE OF INTERROGATORIES
AND REQUEST FOR PRODUCTION DIRECTED TO DEFENDANT[S]

I hereby certify that on this 14th day of January, 2003, the Answers to Interrogatories Directed To Plaintiff[s], the Responses to Request For Production, and one (1) copy of the Notice of Service of Answers to Interrogatories and Responses to Request For Production were mailed by First Class Mail, postage prepaid, to counsel for Defendant[s] at the following address:

James M. Horne, Esquire
Katherine B. Oliver, Esquire
McQUAIDE, BLASKO, SCHWARTZ
FLEMING & FAULKNER, INC.
811 University Drive
State College PA 16801

EDGAR SNYDER & ASSOCIATES, LLC

By Geoffrey S. Casper/psm
Geoffrey S. Casper
Attorney for Plaintiffs

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KPL

William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
Plaintiffs, : TYPE OF PLEADING:
: Certificate of Service
v. :
ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
Defendant. : FILED ON BEHALF OF:
: DEFENDANT
:
: COUNSEL OF RECORD FOR
: FOR THIS PARTY:
: JAMES M. HORNE, ESQ.
: I.D. NO. 26908
: KATHERINE V. OLIVER, ESQ.
: I.D. NO. 77069
: McQUAIDE, BLASKO, SCHWARTZ,
: FLEMING & FAULKNER, INC.
: 811 University Drive
: State College, PA 16801
: PH# (814) 238-4926
: FAX#(814) 238-9624

10/10/02

John P. Shaw
Fleming & Story

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

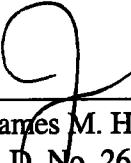
SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
:
Plaintiffs, :
:
v. :
:
ANNA IRENE HEPFER, :
:
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery directed to CVS Pharmacy, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 31st day of January, 2003, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I. D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.

Plaintiffs, : TYPE OF PLEADING:
v. : Prerequisite to Service of
Subpoena/Certificate of Service

ANNA IRENE HEPFER, : TYPE OF CASE: CIVIL
Defendant. : FILED ON BEHALF OF:
: DEFENDANT

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

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William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.

Plaintiffs, :

v. :

ANNA IRENE HEPFER, :

Defendant. :

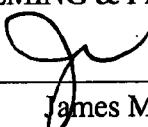
CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENA
PURSUANT TO RULE 4009.22

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

- 1) a notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- 3) no objection has been received by Plaintiffs' counsel, and,
- 4) the subpoena which will be served is identical to the subpoena which are attached to the notice of intent to serve the subpoena.

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

Date: February 26, 2003

By: 

James M. Horne, Esquire

I.D. No. 26908

Attorneys for Defendant

811 University Drive

State College, PA 16801-6699

(814) 238-4926

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

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.

Plaintiffs,

v.

ANNA IRENE HEPFER,

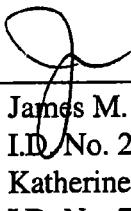
Defendant.

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

Defendant intends to serve a subpoena identical to that attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

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

Date: January 31, 2003

By: 

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

Attorneys for Defendant

811 University Drive

State College, PA 16801-6699

(814) 238-4926

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
Plaintiffs, :
v. :
ANNA IRENE HEPFER, :
Defendant. :
:

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

TO: *CVS Pharmacy*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all pharmacy records in your possession pertaining to Susan Rae Snyder, SS#176-64-7895, Date of Birth: 3/26/70.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

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

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

William Shaw, Prothonotary/Clerk
Civil Division
[Seal of the Court]

Dated: _____

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

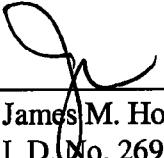
SUSAN SNYDER and BRIAN SNYDER, : No. 02-1189-C.D.
: :
Plaintiffs, : :
: :
v. : :
: :
ANNA IRENE HEPFER, : :
: :
Defendant. : :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoena, in the above-captioned matter was mailed by U.S. First Class Mail, postage prepaid, on this 26th day of February, 2003, to the attorney/party of record:

Geoffrey S. Casher, Esquire
Edgar Snyder & Associates, LLC
100 West High Street
Ebensburg, PA 15931-1539
(814) 472-9000

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

By: 

James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
Attorneys for Defendant
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SUSAN SNYDER and BRIAN No. 02-1189-C.D.
SNYDER,

Plaintiff
vs.

**PRAECIPE TO SETTLE AND
DISCONTINUE**

ANNA IRENE HEPFER,

Defendant

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC
100 West High Street
Ebensburg, PA 15931-1539

(814) 472-9000

FILED

APR 04 2003

William A. Shaw
Prothonotary

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

SUSAN SNYDER and BRIAN
SNYDER,

No.: 02-1189-C.D.

Plaintiffs

-vs-

ANNA IRENE HEPFER,

Defendant

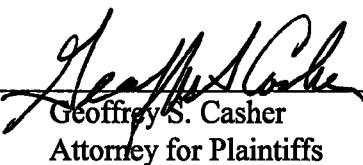
PRAECIPE TO SETTLE AND DISCONTINUE

To: William Shaw, Prothonotary

Please satisfy, settle and discontinue the within matter.

EDGAR SNYDER & ASSOCIATES, LLC

By



Geoffrey S. Casher
Attorney for Plaintiffs

FILED

NO. 03
CRA
KAA

APR 04 2003

William A. Shaw
Prothonotary

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

CIVIL DIVISION

**Susan Snyder
Brian Snyder**

Vs. **No. 2002-01189-CD**
Anna Irene Hepfer

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 April 4, 2003, marked:

Settled and Discontinued

Record costs in the sum of \$80.00 have been paid in full by Geoffrey S. Casher, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 4th day of April A.D. 2003.

William A. Shaw, Prothonotary