

02-1589 CD
AMANDA COOVER vs. MEGAN SROCK

GD 02-7012^u
Prp ef
7

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

Plaintiff,

v.

MEGAN SROCK,

Defendant.

CIVIL DIVISION

No.: GD 02-7012

02-1589-CD

**PRELIMINARY OBJECTIONS
TO CHANGE VENUE AND
BRIEF IN SUPPORT THEREOF**

(Jury Trial Demanded)

FILED ON BEHALF OF:

Defendant Megan Srock

COUNSEL OF RECORD:

Thomas A. McDonnell, Esquire
PA I.D. # 52711

SUMMER, McDONNELL, WALSH &
SKEEL, L.L.P.
Firm #911

The Gulf Tower - Suite 2400
707 Grant Street
Pittsburgh, PA 15219

(412) 261-3232

02 OCT -7 AM 10:56
PROTHONOTARY
ALLEGHENY COUNTY

#10612

FILED Billed
m 19:47 BH
OCT 11 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

**PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT
THEREOF**

AND NOW, comes the Defendant, Megan Srock, by and through her attorneys, Thomas A. McDonnell, Esquire, and Summers, McDonnell, Walsh & Skeel, and files the following Preliminary Objections and avers as follows:

1. The Plaintiff has instituted this lawsuit against the Defendant as a result of injuries that she alleges she sustained in a motor vehicle incident occurring on or about April 8, 2000.
2. This lawsuit was filed in the Court of Common Pleas of Allegheny County, Pennsylvania; a copy of the Complaint is attached hereto as Exhibit "A".
3. The subject motor vehicle incident occurred in the Ames parking lot in Philipsburg, Clearfield County, Pennsylvania.
4. The Defendant currently resides, and at the time of the accident resided at RR #2 Box 46, Ginter, Clearfield County, Pennsylvania.
5. Rule 1006(a) of the Pennsylvania Rules of Civil Procedure provides that an action against an individual may be brought in and only in a county in which he may be served or in which the cause of action arose or where a transaction or occurrence took place out of which the cause of action arose or in any other county authorized by law.

6. As the motor vehicle incident in this case occurred in Clearfield County, Pennsylvania and the Defendant at all times relevant hereto resided in Clearfield County, Pennsylvania, the proper venue in this case is Clearfield County, Pennsylvania.

WHEREFORE, the Defendant, Megan Srock, respectfully requests this Honorable Court to grant her Preliminary Objections and order that venue of this case be transferred to Clearfield County, Pennsylvania.

BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS TO CHANGE VENUE

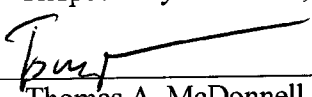
Statement of Facts

The Plaintiff, Amanda Coover, has filed the present lawsuit in the Court of Common Pleas of Allegheny County, Pennsylvania against the Defendant, Megan Srock, as the result of injuries that the Plaintiff alleges to have sustained in a motor vehicle incident occurring on or about April 8, 2000. The subject motor vehicle incident occurred in the Ames parking lot in Philipsburg, Clearfield County, Pennsylvania. The Defendant now resides, and at the time of this incident, resided at RR # 2 Box 46, Ginter, Clearfield County, Pennsylvania. The Defendant avers that venue is improper in this matter.

DISCUSSION

Rule 1006(a) of the Pennsylvania Rule of Civil Procedure provides that an action against an individual may be brought in and only in a county in which he may be served or in which the cause of action arose or where a transaction or occurrence took place out of which the cause of action arose or in any other county authorized by law. As the motor vehicle incident in this case occurred in Clearfield County Pennsylvania and the Defendant resides in Clearfield County, Pennsylvania, the proper venue in this case is Clearfield County.

WHEREFORE, the Defendant, Megan Srock, respectfully requests this Honorable Court to grant her Preliminary Objections and order that venue of this case be transferred to Clearfield County, Pennsylvania.

Respectfully submitted,
By: 
Thomas A. McDonnell, Esquire
Counsel for Defendant,
Megan Srock

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

NOTICE OF PRESENTATION

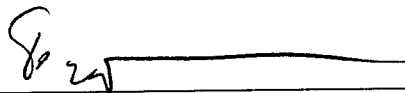
TAKE NOTE that the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** will be presented before the Honorable Eugene B. Straussburger, of the Court of Common Pleas of Allegheny County, on **Monday, October 7, 2002** at **9:30 a.m.** or as soon thereafter as suits the convenience of the Court.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** was served upon counsel of record by mailing the same via first class mail, postage pre-paid, this 7th day of October, 2002, addressed as follows:

James Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

By: _____



Thomas A. McDonnell, Esquire
Attorney for Defendant
State Farm Mutual Automobile
Insurance Company

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

No. GD 02-7012

COMPLAINT

Filed on behalf of:
Plaintiff

Counsel of Record for this
Party:

James B. Cole, Esquire
Pa. I.D. #15801

STOKES LURIE COLE &
HENS-GRECO, P.C.
Firm #012

2100 Law & Finance Building
Pittsburgh, PA. 15219

(412) 391-0800

EXHIBIT

A

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

GD 02-7012

vs.

MEGAN SROCK,

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 other claim or relief requested by the plaintiff. You may lose money or property or other right important to you.

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

Lawyer Referral Service
The Allegheny County Bar Association
920 City-County Building
414 Grant Street
Pittsburgh, PA 15219
Telephone: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGNEY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

No. GD 02-7012

COMPLAINT

1. The plaintiff resides at 19 East 10th Street, Tyrone, Blair County, Pennsylvania.

2. The defendant resides at RR#2 Box 46, Ginter, Clearfield County, Pennsylvania.

3. The events complained of happened on April 8, 2000 in Philipsburg, Pennsylvania.

4. At that time and place the plaintiff was a passenger in a motor vehicle in the Ames parking lot when the defendant negligently backed her vehicle out of a parking space and collided with the vehicle in which the plaintiff was riding, thereby injuring the plaintiff.

5. The injuries and damages suffered by the plaintiff were the direct and proximate result of the negligence of the defendant in the following respects:

- (a) in operating her vehicle at an excessive rate of speed under the circumstances;
- (b) in failing to keep and maintain a proper and adequate lookout;
- (c) in failing to keep and maintain her vehicle under proper and adequate control;

- (d) in failing to yield the right of way to the said plaintiff's vehicle which was entitled thereto under the circumstances;
- (e) in failing to stop, slow or turn the said defendant's vehicle aside when the defendant knew or by the exercise of reasonable care should have known that if the said vehicle were permitted to proceed a collision would result;
- (f) in operating the said defendant's vehicle into collision with the said automobile of the plaintiff;
- (g) in failing to properly observe and heed the traffic conditions then and there existing;
- (h) in accelerating the said defendant's vehicle under the circumstances.

6. As a direct and proximate result of the negligence of the defendant, the plaintiff suffered strain, sprain, injury and damage to the muscles, ligaments nerves and tissues of the cervical, thoracic and lumbar spine, including the cervical brachial plexus.

7. As a direct and proximate result of the negligence of the defendant the plaintiff has been damaged as follows:

- (a) she has incurred and may in the future incur medical expense for the treatment of her injuries;
- (b) she has suffered and may in the future suffer pain, inconvenience, mental distress and loss of enjoyment of life.

WHEREFORE, the plaintiff demands judgment against the defendant for an amount in excess of the arbitration limits of this court.

STOKES LURIE COLE & HENS-GRECO, P.C.

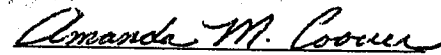
By: 

James B. Cole
Attorneys for Plaintiff

JURY TRIAL DEMANDED

VERIFICATION

I verify that the averments of fact made in this Complaint are true and correct and based upon my personal knowledge, information and belief. I understand that averments of fact in said document are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.


Amanda Coover

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Complaint was served upon counsel for defendant by first class mail, postage prepaid, this 23 day of September, 2002.

TO: Thomas A. McDonnell, Esquire
Summers, McDonnell, Walsh & Skeel
Suite 2400
The Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

STOKES LURIE COLE & HENS-GRECO, P.C.

By: James B. Cole
James B. Cole
Attorneys for Plaintiffs

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

NOTICE OF PRESENTATION

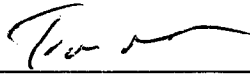
TAKE NOTE that the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** will be presented before the Honorable Eugene B. Straussburger, of the Court of Common Pleas of Allegheny County, on **Monday, October 7, 2002** at **9:30 a.m.** or as soon thereafter as suits the convenience of the Court.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** was served upon counsel of record by mailing the same via first class mail, postage pre-paid, this 2nd day of October, 2002, addressed as follows:

James Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

By: _____


Thomas A. McDonnell, Esquire
Attorney for Defendant
State Farm Mutual Automobile
Insurance Company

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

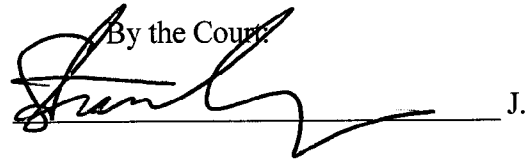
MEGAN SROCK,

Defendant.

ORDER OF COURT

AND NOW, to-wit, this 7th day of Oct, 2002, upon consideration of the foregoing Preliminary Objections to Change Venue and Brief in Support of Preliminary Objections to Plaintiff's Complaint, Defendant's Preliminary Objections are hereby granted and venue is transferred to Clearfield County, Pennsylvania.

It consents.

By the Court:
 J.

GD-02-7012
P1

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

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

No.

**PRAECIPE FOR WRIT OF
SUMMONS**

Filed on behalf of:
Plaintiff

Counsel of Record for this
Party:

James B. Cole, Esquire
Pa. I.D. #15801

STOKES LURIE COLE &
HENS-GRECO, P.C.
Firm #012

2100 Law & Finance Building
Pittsburgh, PA. 15219

(412) 391-0800



OPSS/LH/MS/01
04-08-2002 03:11:11
GD-02-0378.2

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

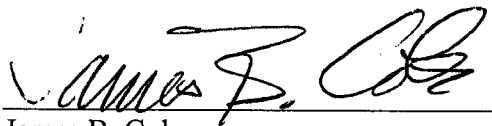
AMANDA COOVER,	:	
	:	
Plaintiff,	:	No.
	:	
	:	
vs.	:	
	:	
MEGAN SROCK,	:	
	:	
Defendant.	:	

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons in a Civil Action against defendant, above-named.

STOKES LURIE COLE & HENS-GRECO, P.C.

By: 
James B. Cole
Attorneys for Plaintiff

2611C

WRIT OF SUMMONS IN CIVIL ACTION

TO DEFENDANT(S): You are notified that the plaintiff(s) has/have commenced an action against you which you are required to Defend.

Date April 8, 2002 Michael Lamb, Prothonotary

Returnable May 7, 2002 C. J. Stue Deputy

) SHERIFF

) SURCHARGE

) MILEAGE

25
9

34.00

\$3264 - Clearfield.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

No. GD-02-7012

PRAECIPE FOR WRIT OF
SUMMONS

Filed on behalf of:
Plaintiff

Counsel of Record for this
Party:

James B. Cole, Esquire
Pa. I.D. #15801

STOKES LURIE COLE &
HENS-GRECO, P.C.
Firm #012

2100 Law & Finance Building
Pittsburgh, PA. 15219

ATTEST

(412) 391-0800

John R. Kufz

SHERIFF

SE:Z 17 2 vs JULY 2002

ALLEGHENY COUNTY
SHERIFF'S OFFICE
MEGAN SROCK

Defendant.

02 MAY 16 AM 11:46
ALLEGHENY COUNTY
SHERIFF'S OFFICE

DEPUTIZE SERVICE CLEARFIELD
ALLEGHENY COUNTY SHERIFF'S DEPARTMENT
436 GRANT STREET
PITTSBURGH, PA 15219-2496
PHONE (412) 350-4700
FAX (412) 350-6388

PETER R. DEFAZIO
Sheriff

DENNIS SKOSNIK
Chief Deputy

PLAINTIFF: AMANDA COOVER

VS.

DEFT.: MEGAN SROCK

DEFT.:

DEFT.:

GARNISHEE:

ADDRESS: R.R. 2, Box 46
Ginter, PA. 16651

MUNICIPALITY OR CITY WARD:

ATTY:

James B. Cole

DATE: April 11, 2002

ADDRESS:

2100 Law & Finance Bldg.

ATTY'S PHONE: (412) 391-0800

Pittsburgh, PA. 15219

CASE#: GD 02-7012

EXPIRES: 5-7-02

☒ SUMMONS/PRAECIPE

☐ SEIZURE OR POSSESSION

☐ NOTICE AND COMPLAINT

☐ REVIVAL OR SCI FA

☐ INTERROGATORIES

☐ EXECUTION • LEVY OR GARNISHEE

☐ OTHER

INDICATE TYPE OF SERVICE: ☒ PERSONAL ☐ PERSON IN CHARGE ☐ DEPUTIZE ☐ CERT. MAIL ☐ POSTED ☐ OTHER ☐ LEVY ☐ SEIZED & STORED

NOW: I, SHERIFF OF ALLEGHENY COUNTY, PA do hereby deputize the Sheriff of
CLEARFIELD County to execute this Writ and make return thereof according to law

NOTE: ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, with out liability on the part of such deputy herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

MAKE

MODEL

MOTOR NUMBER

SERIAL NUMBER

LICENSE NUMBER

SHERIFF'S OFFICE USE ONLY

I hearby CERTIFY and RETURN that on the _____ day of _____, 19____, at _____ o'clock, A.M./P.M. Address Above/ Address Below, County of Allegheny, Pennsylvania

I have served in the manner Described below:

☐ Defendant(s) personally served.

☐ Adult family member with whom said Defendant(s) reside(s). Name & Relationship _____

☐ Adult in charge of Defendant's residence who refused to give name or relationship.

☐ Manager/other person authorized to accept deliveries of United States Mail _____

☐ Agent or person in charge of Defendant(s) office or usual place of business.

☐ Other _____

☐ Property Posted _____

Defendant not found because: ☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other _____

☐ Certified Mail ☐ Receipt _____ ☐ Envelope Returned _____ ☐ Neither receipt or envelope returned: writ expired _____

☐ Regular Mail Why _____

You are hereby notified that on _____, 19____, levy was made in the case of _____
Possession/Sale has been set for _____, 19____ at _____ o'clock

YOU MUST CALL DEPUTY ON THE MORNING OF SALE/POSSESSION BETWEEN 8:30 - 9:30 A.M.

ATTEMPTS _____ / _____ / _____ / _____ / _____

Additional Costs Due \$ _____, This is
placed on writ when returned to Prothonotary. Please check
before satisfying case.

PETER R. DEFAZIO, Sheriff

BY: _____ (DEPUTY)

DISTRICT: _____

White Copy - Sheriff

Pink Copy - Attorney



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12409

COOVER, AMANDA

GD-02-7012

VS.

SROCK, MEGAN

PRAECIPE FOR WRIT OF SUMMONS & SUMMONS

SHERIFF RETURNS

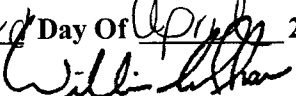
NOW APRIL 22, 2002 AT 10:28 AM EST SERVED THE WITHIN PRAECIPE & SUMMONS ON MEGAN SROCK, DEFENDANT AT RESIDENCE, RR#2 BOX 46, GINTER, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MEGAN SROCK A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE & SUMMONS AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: DAVIS/MORGILLO

Return Costs

Cost	Description
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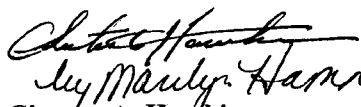
32.64	SHFF. HAWKINS PAID BY; ATTY.
-------	------------------------------

Sworn to Before Me This

23rd Day Of April 2002


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

So Answers,


Chester A. Hawkins
Sheriff

2011.01.07.01

ALLEGHENY COUNTY

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

CIVIL DIVISION

No.: G.D. 02-7012

**PRAECIPE FOR RULE TO FILE
COMPLAINT**

Filed on behalf of the
Defendant.

Counsel of Record for
This Party

Thomas A. McDonnell
PA I.D. #52711
SUMMERS, MCDONNELL,
WALSH & SKEEL, L.L.P.
FIRM #911

The Gulf Tower, Suite 2400
707 Grant Street
Pittsburgh, PA 15219

(412) 261-3232

Issued

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,)	CIVIL DIVISION
)	
Plaintiff,)	CASE NO.: G.D. 02-7012
)	
vs.)	
)	
MEGAN SROCK,)	
)	
Defendant.)	

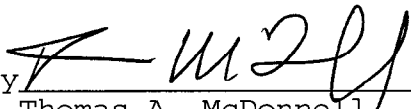
PRAECIPE FOR RULE TO FILE COMPLAINT

TO: THE PROTHONOTARY

Kindly rule the Plaintiff, Amanda Coover, to file a Complaint in Civil Action within twenty (20) days.

Respectfully submitted,

SUMMERS, McDONNELL, WALSH & SKEEL, L.L.P.


By 
Thomas A. McDonnell
Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Praecipe for Rule to File Complaint** has been mailed by U.S. Mail to counsel of record via first class mail, postage pre-paid, this 24th day of May, 2002.

James Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

SUMMERS, McDONNELL, WALSH & SKEEL, L.L.P.

By 
Thomas A. McDonnell
Counsel for Defendant

60-62-607012

PA01

3

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

Plaintiffs,

vs.

MEGAN SROCK,

Defendant.

CIVIL DIVISION

No.: G.D. 02-7012

PRAECIPE FOR APPEARANCE

(Jury Trial Demanded)

Filed on Behalf of the
Defendant.

Counsel of Record for
This Party:

Thomas A. McDonnell
PA I.D. #52711

SUMMERS, McDONNELL, WALSH & SKEEL,
L.L.P.
Firm #911

The Gulf Tower, Suite 2400
707 Grant Street
Pittsburgh, PA 15219

(412) 261-3232

005\$RFERG01

03 24 2002 03:41:51

60-02-007012

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,)	CIVIL DIVISION
)	
Plaintiffs,)	No.: G.D. 02-7012
)	
vs.)	PRAECIPE FOR APPEARANCE
)	(Jury Trial Demanded)
MEGAN SROCK,)	
)	
Defendant.)	

PRAECIPE FOR APPEARANCE

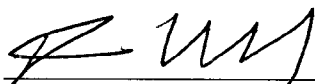
TO: THE PROTHONOTARY

Kindly enter the Appearance of the undersigned, Thomas A. McDonnell, Esquire, of the law firm of Summers, McDonnell, Walsh & Skeel, on behalf of the Defendant, Megan Srock, in the above case.

JURY TRIAL DEMANDED

Respectfully submitted,

SUMMERS, McDONNELL, WALSH & SKEEL, L.L.P.

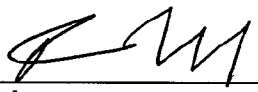
By: 
Thomas A. McDonnell
Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Praecipe for Appearance** has been mailed by U.S. Mail to counsel of record via first class mail, postage pre-paid, this 29th day of May, 2002:

James Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

SUMMERS, McDONNELL, WALSH & SKEEL, L.L.P.

By 
Thomas A. McDonnell
Counsel for Defendant

GD 02-7012
COMP 2
5

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

No. GD 02-7012

COMPLAINT

Filed on behalf of:
Plaintiff

Counsel of Record for this
Party:

James B. Cole, Esquire
Pa. I.D. #15801

STOKES LURIE COLE &
HENS-GRECO, P.C.
Firm #012

2100 Law & Finance Building
Pittsburgh, PA. 15219

(412) 391-0800

ALLEGHENY COUNTY

AMANDA COOVER,
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:
Plaintiff, : GD 02-7012
:
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vs. :
:
:
MEGAN SROCK, :
:
:
Defendant. :

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 right important to you.

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

Lawyer Referral Service
The Allegheny County Bar Association
920 City-County Building
414 Grant Street
Pittsburgh, PA 15219
Telephone: (412) 261-5555

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

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

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No. GD 02-7012

COMPLAINT

1. The plaintiff resides at 19 East 10th Street, Tyrone, Blair County, Pennsylvania.

2. The defendant resides at RR#2 Box 46, Ginter, Clearfield County, Pennsylvania.

3. The events complained of happened on April 8, 2000 in Philipsburg, Pennsylvania.

4. At that time and place the plaintiff was a passenger in a motor vehicle in the Ames parking lot when the defendant negligently backed her vehicle out of a parking space and collided with the vehicle in which the plaintiff was riding, thereby injuring the plaintiff.

5. The injuries and damages suffered by the plaintiff were the direct and proximate result of the negligence of the defendant in the following respects:

- (a) in operating her vehicle at an excessive rate of speed under the circumstances;
- (b) in failing to keep and maintain a proper and adequate lookout;
- (c) in failing to keep and maintain her vehicle under proper and adequate control;

- (d) in failing to yield the right of way to the said plaintiff's vehicle which was entitled thereto under the circumstances;
- (e) in failing to stop, slow or turn the said defendant's vehicle aside when the defendant knew or by the exercise of reasonable care should have known that if the said vehicle were permitted to proceed a collision would result;
- (f) in operating the said defendant's vehicle into collision with the said automobile of the plaintiff;
- (g) in failing to properly observe and heed the traffic conditions then and there existing;
- (h) in accelerating the said defendant's vehicle under the circumstances.

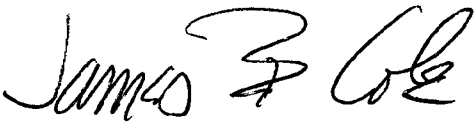
6. As a direct and proximate result of the negligence of the defendant, the plaintiff suffered strain, sprain, injury and damage to the muscles, ligaments nerves and tissues of the cervical, thoracic and lumbar spine, including the cervical brachial plexus.

7. As a direct and proximate result of the negligence of the defendant the plaintiff has been damaged as follows:

- (a) she has incurred and may in the future incur medical expense for the treatment of her injuries;
- (b) she has suffered and may in the future suffer pain, inconvenience, mental distress and loss of enjoyment of life.

WHEREFORE, the plaintiff demands judgment against the defendant for an amount in excess of the arbitration limits of this court.

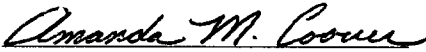
STOKES LURIE COLE & HENS-GRECO, P.C.

By: 
James B. Cole
Attorneys for Plaintiff

JURY TRIAL DEMANDED

VERIFICATION

I verify that the averments of fact made in this Complaint are true and correct and based upon my personal knowledge, information and belief. I understand that averments of fact in said document are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.


Amanda Coover

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Complaint was served upon counsel for defendant by first class mail, postage prepaid, this 23 day of September, 2002.

TO: Thomas A. McDonnell, Esquire
Summers, McDonnell, Walsh & Skeel
Suite 2400
The Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

STOKES LURIE COLE & HENS-GRECO, P.C.

By: James B. Cole
James B. Cole
Attorneys for Plaintiffs

Strassburg
GD 02-7012
PO
6

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

**PRELIMINARY OBJECTIONS
TO CHANGE VENUE AND
BRIEF IN SUPPORT THEREOF**

Defendant.

(Jury Trial Demanded)

FILED ON BEHALF OF:

Defendant Megan Srock

COUNSEL OF RECORD:

Thomas A. McDonnell, Esquire
PA I.D. # 52711

SUMMER, McDONNELL, WALSH &
SKEEL, L.L.P.
Firm #911

The Gulf Tower · Suite 2400
707 Grant Street
Pittsburgh, PA 15219

(412) 261-3232

2002 OCT -2 PM 3:43
Court U. Common Pleas

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER, CIVIL DIVISION

Plaintiff, No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

**PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT
THEREOF**

AND NOW, comes the Defendant, Megan Srock, by and through her attorneys, Thomas A. McDonnell, Esquire, and Summers, McDonnell, Walsh & Skeel, and files the following Preliminary Objections and avers as follows:

1. The Plaintiff has instituted this lawsuit against the Defendant as a result of injuries that she alleges she sustained in a motor vehicle incident occurring on or about April 8, 2000.
2. This lawsuit was filed in the Court of Common Pleas of Allegheny County, Pennsylvania; a copy of the Complaint is attached hereto as Exhibit "A".
3. The subject motor vehicle incident occurred in the Ames parking lot in Philipsburg, Clearfield County, Pennsylvania.
4. The Defendant currently resides, and at the time of the accident resided at RR #2 Box 46, Ginter, Clearfield County, Pennsylvania.
5. Rule 1006(a) of the Pennsylvania Rules of Civil Procedure provides that an action against an individual may be brought in and only in a county in which he may be served or in which the cause of action arose or where a transaction or occurrence took place out of which the cause of action arose or in any other county authorized by law.

6. As the motor vehicle incident in this case occurred in Clearfield County, Pennsylvania and the Defendant at all times relevant hereto resided in Clearfield County, Pennsylvania, the proper venue in this case is Clearfield County, Pennsylvania.

WHEREFORE, the Defendant, Megan Srock, respectfully requests this Honorable Court to grant her Preliminary Objections and order that venue of this case be transferred to Clearfield County, Pennsylvania.

BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS TO CHANGE VENUE

Statement of Facts

The Plaintiff, Amanda Coover, has filed the present lawsuit in the Court of Common Pleas of Allegheny County, Pennsylvania against the Defendant, Megan Srock, as the result of injuries that the Plaintiff alleges to have sustained in a motor vehicle incident occurring on or about April 8, 2000. The subject motor vehicle incident occurred in the Ames parking lot in Philipsburg, Clearfield County, Pennsylvania. The Defendant now resides, and at the time of this incident, resided at RR # 2 Box 46, Ginter, Clearfield County, Pennsylvania. The Defendant avers that venue is improper in this matter.

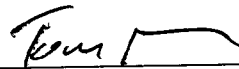
DISCUSSION

Rule 1006(a) of the Pennsylvania Rule of Civil Procedure provides that an action against an individual may be brought in and only in a county in which he may be served or in which the cause of action arose or where a transaction or occurrence took place out of which the cause of action arose or in any other county authorized by law. As the motor vehicle incident in this case occurred in Clearfield County Pennsylvania and the Defendant resides in Clearfield County, Pennsylvania, the proper venue in this case is Clearfield County.

WHEREFORE, the Defendant, Megan Srock, respectfully requests this Honorable Court to grant her Preliminary Objections and order that venue of this case be transferred to Clearfield County, Pennsylvania.

Respectfully submitted,

By: _____



Thomas A. McDonnell, Esquire
Counsel for Defendant,
Megan Srock

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

No. GD 02-7012

COMPLAINT

Filed on behalf of:
Plaintiff

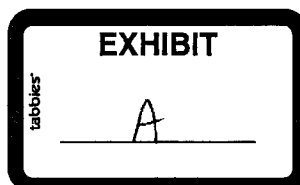
Counsel of Record for this
Party:

James B. Cole, Esquire
Pa. I.D. #15801

STOKES LURIE COLE &
HENS-GRECO, P.C.
Firm #012

2100 Law & Finance Building
Pittsburgh, PA. 15219

(412) 391-0800



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

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

GD 02-7012

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 other claim or relief requested by the plaintiff. You may lose money or property or other right important to you.

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

Lawyer Referral Service
The Allegheny County Bar Association
920 City-County Building
414 Grant Street
Pittsburgh, PA 15219
Telephone: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGNEY COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

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No. GD 02-7012

COMPLAINT

1. The plaintiff resides at 19 East 10th Street, Tyrone, Blair County, Pennsylvania.
2. The defendant resides at RR#2 Box 46, Ginter, Clearfield County, Pennsylvania.
3. The events complained of happened on April 8, 2000 in Philipsburg, Pennsylvania.
4. At that time and place the plaintiff was a passenger in a motor vehicle in the Ames parking lot when the defendant negligently backed her vehicle out of a parking space and collided with the vehicle in which the plaintiff was riding, thereby injuring the plaintiff.

5. The injuries and damages suffered by the plaintiff were the direct and proximate result of the negligence of the defendant in the following respects:

- (a) in operating her vehicle at an excessive rate of speed under the circumstances;
- (b) in failing to keep and maintain a proper and adequate lookout;
- (c) in failing to keep and maintain her vehicle under proper and adequate control;

- (d) in failing to yield the right of way to the said plaintiff's vehicle which was entitled thereto under the circumstances;
- (e) in failing to stop, slow or turn the said defendant's vehicle aside when the defendant knew or by the exercise of reasonable care should have known that if the said vehicle were permitted to proceed a collision would result;
- (f) in operating the said defendant's vehicle into collision with the said automobile of the plaintiff;
- (g) in failing to properly observe and heed the traffic conditions then and there existing;
- (h) in accelerating the said defendant's vehicle under the circumstances.

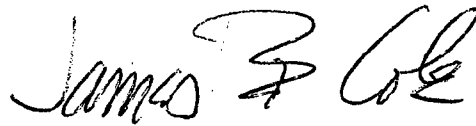
6. As a direct and proximate result of the negligence of the defendant, the plaintiff suffered strain, sprain, injury and damage to the muscles, ligaments nerves and tissues of the cervical, thoracic and lumbar spine, including the cervical brachial plexus.

7. As a direct and proximate result of the negligence of the defendant the plaintiff has been damaged as follows:

- (a) she has incurred and may in the future incur medical expense for the treatment of her injuries;
- (b) she has suffered and may in the future suffer pain, inconvenience, mental distress and loss of enjoyment of life.

WHEREFORE, the plaintiff demands judgment against the defendant for an amount in excess of the arbitration limits of this court.


STOKES LURIE COLE & HENS-GRECO, P.C.

By: 
James B. Cole
Attorneys for Plaintiff

JURY TRIAL DEMANDED

VERIFICATION

I verify that the averments of fact made in this Complaint are true and correct and based upon my personal knowledge, information and belief. I understand that averments of fact in said document are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.


Amanda Coover

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Complaint was served upon counsel for defendant by first class mail, postage prepaid, this 23 day of September, 2002.

TO: Thomas A. McDonnell, Esquire
Summers, McDonnell, Walsh & Skeel
Suite 2400
The Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

STOKES LURIE COLE & HENS-GRECO, P.C.

By: James B. Cole
James B. Cole
Attorneys for Plaintiffs

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

NOTICE OF PRESENTATION

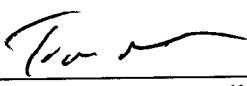
TAKE NOTE that the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** will be presented before the Honorable Eugene B. Straussburger, of the Court of Common Pleas of Allegheny County, on **Monday, October 7, 2002** at **9:30 a.m.** or as soon thereafter as suits the convenience of the Court.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **PRELIMINARY OBJECTIONS TO CHANGE VENUE AND BRIEF IN SUPPORT THEREOF** was served upon counsel of record by mailing the same via first class mail, postage pre-paid, this 2nd day of October, 2002, addressed as follows:

James Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

By: _____


Thomas A. McDonnell, Esquire
Attorney for Defendant
State Farm Mutual Automobile
Insurance Company

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AMANDA COOVER,

CIVIL DIVISION

Plaintiff,

No.: GD 02-7012

v.

MEGAN SROCK,

Defendant.

ORDER OF COURT

AND NOW, to-wit, this _____ day of _____, 2002, upon consideration of the foregoing Preliminary Objections to Change Venue and Brief in Support of Preliminary Objections to Plaintiff's Complaint, Defendant's Preliminary Objections are hereby granted and venue is transferred to Clearfield County, Pennsylvania.

By the Court:

_____. J.

02-1584-cD

[Home]

Allegheny County Prothonotary Civil Docket Report

GD-02-007012

*****CASE TRANSFERRED TO CLEARFIELD COUNTY*****

Run Date: 10/08/2002

Run Time: 09:15:45 AM

Court Type:

General Docket

Case Type:

Multiple Civil Action

Related Cases:

Judge:

No Judge

Jury Requested:

No

Current Status:

Case Transferred

Amount In Dispute:

\$--

Parties**-- Litigants --**

ID	LName	FName	MI	Type	Address	Phone	Attorney
@1074385	Coover	Amanda	---	Plaintiff	19 East 10th St. Tyrone PA xxxx	--	Cole James B.,
@1074386	Srock	Megan	---	Defendant	R R Box 46 Houtzdale PA 16651	--	McDonnell Thomas A.,

-- Attorney --

ID	LName	FName	MI	Type	Address	Phone
15801	Cole	James	B.	Plaintiff's Attorney	2100 Law & Finance Bldg. Pittsburgh PA 15219	(412) 3910800
52711	McDonnell	Thomas	A.	Defendant's Attorney	Gulf Tower Suite 2400 707 Grant St. Pittsburgh PA 15219	(412) 2613232

-- Non Litigants --

ID	LName	FName	MI	Type	Address	Phone
ACPROTH	Allegheny County Prothonotary	---	---	Prothonotary	No Default Address Available	(412) 3505729
SHRF02	Sheriff - Allegheny County	---	---	Sheriff	Courthouse Room 111 Pittsburgh PA 15219	--
SHRF17	Sheriff - Clearfield County	---	---	Sheriff	Market Street Clearfield PA 16830	(814) 7652641

Docket Entries

Filing Date	Docket Type	Docket Text	Filing Party
04/08/2002	Praecipe for Writ of Summons	Returnable 05/08/02.	Coover Amanda
05/16/2002	Sheriff Return	Megan Srock served with Writ of Summons on 4/22/02 in Clearfield Co.	Sheriff - Allegheny County

05/24/2002	Praecipe for Appearance	by Thomas A. McDonnell	Srock Megan
05/24/2002	Praecipe for Rule to File Comp	Upon Plaintiff.	Srock Megan
09/23/2002	Complaint	served on 9/23/02 first class mail t Thomas A. McDonnell Esq.	Coover Amanda
10/03/2002	Preliminary Objections	to change of venue and brief in support	Srock Megan
10/07/2002	Order of Court	Dated 10/07/02. Ordered that defts P.O.'s are granted and venue is transferred to Clearfild Co. Pa. Strassburger J.	Srock Megan
10/08/2002	Case Transferred	As per Order of Court dated 10/07/02. Case is transferred to Clearfield County, PA. Strassburger, J.	Allegheny County Prothonotary

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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No. 02-1589 CD

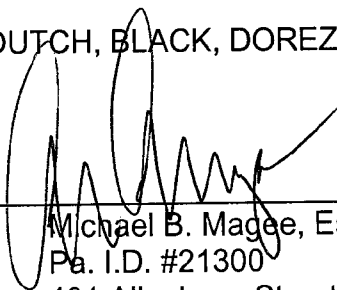
PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please note the appearance of the undersigned as counsel of record for the Defendant, Megan Srock, in the above matter. Any correspondence and papers in connection with this action may be served upon the undersigned at his office, 401 Allegheny Street, Hollidaysburg, Pennsylvania 16648.

EVEY, ROUTH, BLACK, DOREZAS, MAGEE & LEVINE LLP

BY



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

NOV 29 2002

William A. Shaw
Prothonotary

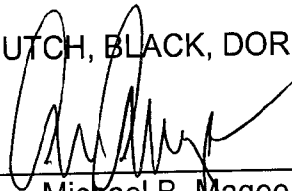
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 21 day of March, 2002, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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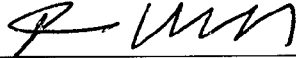
No. 02-1589 CD

PRAECIPE FOR WITHDRAWAL OF APPEARANCE

TO THE PROTHONOTARY:

Please withdraw the appearance of the undersigned as counsel for Defendant regarding the above matter.

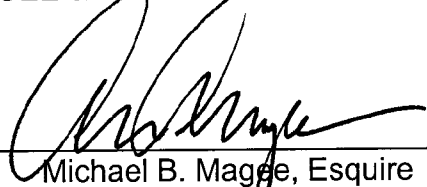
SUMMERS, MCDONNELL, WALSH & SKEEL, L.L.P.

By 
Thomas A. McDonnell, Esquire
Gulf Tower, Suite 2400
707 Grant Street
Pittsburgh, PA 15219

PRAECIPE FOR ENTRY OF APPEARANCE

Please enter the appearance of the undersigned as attorney of record for Defendant regarding the above-captioned matter.

EVEY, ROUTCH, BLACK, DOREZAS,
MAGEE & LEVINE LLP

By 
Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

Date: 12-8-02

FILED

DEC 12 2002

William A. Shaw
Prothonotary

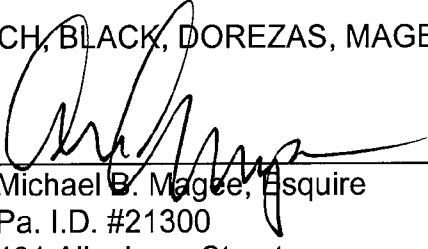
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 10 day of Dec - _____, 2002, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By _____


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED

NO
CC

11:07 AM
DEC 12 2002

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William A. Shaw
Prothonotary

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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No. 02-1589 CD

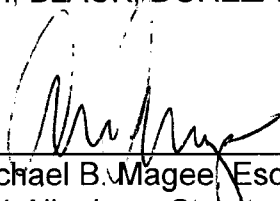
NOTICE

TO: PLAINTIFF

YOU ARE HEREBY NOTIFIED TO FILE A WRITTEN RESPONSE TO THE ENCLOSED
NEW MATTER WITHIN TWENTY (20) DAYS FROM SERVICE HEREOF OR A JUDGMENT
MAY BE ENTERED AGAINST YOU.

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By


Michael B. Magee, Esquire
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581
I.D. #21300

FILED

JAN 02 2003

William A. Shaw
Prothonotary

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

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

:
: No. 02-1589 CD
:
:

ANSWER WITH NEW MATTER

NOW COMES Defendant Megan Srock by her attorneys, Evey, Rouch, Black, Dorezas, Magee & Levine LLP, and files the following Answer and New Matter to Plaintiff's Complaint, averring:

1. Denied. Despite reasonable investigation, Defendant has insufficient knowledge to form a belief as to this averment and strict proof is requested at time of trial.

2-3. Admitted.

4. It is admitted that Defendant was operating her vehicle from a parking space when her vehicle and a vehicle being operated by an individual later identified as Tracy Yarger came in to contact. Allegations that this Defendant operated her vehicle negligently are denied as constituting conclusions of law to which no response is required.

5. (a)-(h) Denied. Allegations of injuries and damages are denied for the reason that despite reasonable investigation, Defendant has insufficient knowledge to form a belief as to these averments and strict proof is requested at time of trial. Allegations that this Defendant operated her vehicle in a careless and negligent manner are denied as they constitute legal conclusions for which no further response is required.

6-7. Denied. Allegations of injuries and damages are denied for the reason that, despite reasonable investigation, Defendant has insufficient knowledge to form a belief as to those averments and strict proof is requested at time of trial. Allegations that this Defendant operated her vehicle in a negligent manner are denied as constituting legal conclusions for which no further response is required.

NEW MATTER

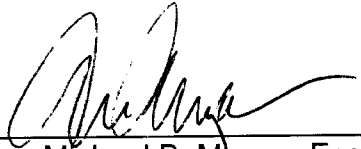
By way of further answer, Defendant avers the following New Matter:

8. Plaintiff's cause of action is governed by the Pennsylvania Motor Vehicle Financial Responsibility Law 75 Pa.C.S.A. 701 et seq., and Defendant hereby raises all setoffs and defenses applicable thereto.

9. If it is determined that Plaintiff is covered by the limited tort option, then Plaintiff is precluded from recovery of non-economic loss if her injuries do not constitute serious injuries.

WHEREFORE, Defendant requests judgment in her favor.

EVEY, ROUTCH, BLACK, DOREZAS,
MAGEE & LEVINE LLP

By 
Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

VERIFICATION

The undersigned, Megan Srock, avers that the statements of fact contained in the foregoing document are true and correct to the best of her knowledge, information and belief, and are made subject to the penalties of 18 Pa. Con. Stat. Ann. Section 4904 relating to unsworn falsification to authorities.

By: Megan D Srock
Megan Srock

Date: 12-24-02

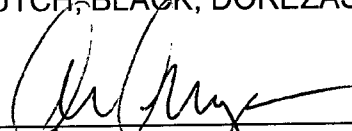
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 30 day of Dec, 2002, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED

NO
CC

3/13:45 PM
JAN 02 2003

[Signature]

William A. Shaw
Prothonotary

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY,
PENNSYLVANIA

No. 02-1589 CD

NOTICE OF TAKING OF ORAL DEPOSITION

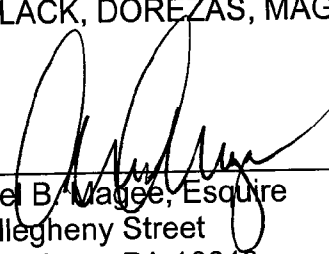
TO: PLAINTIFF

Notice is hereby given that pursuant to Pennsylvania R.C.P. No. 4007.I, the deposition of Amanda Coover will be taken on oral examination on April 14, 2003 at 2:00 p.m. at the offices of Sargent's Court Reporting Service, 106 N. Second Street, Clearfield, Pennsylvania, in the presence of a Court Reporter.

The deposition is being taken for discovery purposes and/or use at trial.

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By


Michael B. Magee, Esquire
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581
I.D. #21300

FILED

MAR 06 2003

William A. Shaw
Prothonotary

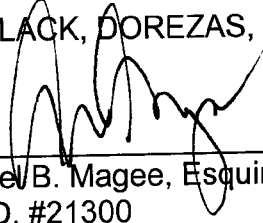
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 6 day of March, 2003, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

(237)

FILED

NO
cc

MAR 11 28 2003

MAR 06 2003

William A. Shaw
Prothonotary

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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No. 02-1589 CD

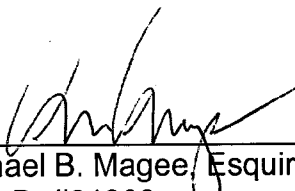
**NOTICE OF SERVICE OF
INTERROGATORIES/REQUEST FOR PRODUCTION OF DOCUMENTS**

You are hereby notified that on the 11 day of April, 2003,
Defendant served Interrogatories/Request for Production of Documents upon the
Plaintiff by mailing the same via First-class United States mail, postage prepaid,
addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

BY



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED

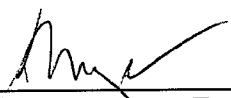
APR 17 2003

William A. Shaw
Prothonotary

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16 day of April, 2003, a true and correct copy of the foregoing document was served upon the following by United States first class mail, postage prepaid:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

By 
Michael B. Magee, Esquire

FILED

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~~04/11/00~~ ~~2003~~

Any Agee

William A. Shaw
Prothonotary

~~2003~~

CA

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY,
PENNSYLVANIA

No. 02-1589 CD

MOTION TO COMPEL

FILED ICC
NOV 23 2004
William A. Shaw
Prothonotary/Clerk of Courts

AND NOW, comes the Defendant, Megan Srock, by and through her attorneys, Evey, Rutch, Black, Dorezas, Magee & Levine LLP, and files the following Motion to Compel further and complete Answers to Interrogatories and Request for Production of Documents directed to Plaintiff and in support sets forth the following:

1. Plaintiff filed a Writ of Summons against Defendant on or about April 8, 2002 and filed a Complaint against Defendant on or about September 23, 2002.
2. Plaintiff alleges she suffered serious personal injury as the result of Defendant's negligence arising out of an automobile accident which occurred April 8, 2000.
3. On April 15, 2003, Defendant submitted Interrogatories and a Request for Production of Documents to Plaintiff's counsel. No objection was filed to that written discovery and no answers to that written discovery have been made by Plaintiff.
4. Defense counsel has requested Plaintiff's counsel answer that discovery in three letters, dated September 9, 2003, December 11, 2003 and August 26, 2004 and in a telephone conversation of August 26, 2004. Copies of that correspondence are attached as Exhibit "A."

5. Pennsylvania Rules of Civil Procedure 4006(a) (2) provides that a party must respond to Interrogatories within thirty (30) days. Rule 4009.12(a) requires a party to file a Reply to Request for Production of Documents within thirty (30) days. Plaintiff has failed to comply with the Rules of Civil Procedure.

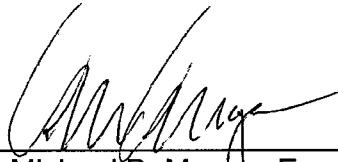
6. Defendant, Megan Srock, will be severely prejudiced without said Discovery Responses.

7. Defendant, Megan Srock, cannot prepare adequate defense without Responses.

WHEREFORE, Defendant, Megan Srock, requests this Honorable Court to enter an Order requiring Plaintiff to fill Full and complete Answers to Interrogatories and Request for Production of Documents within thirty (30) days of the day of the Court's Order or suffer sanctions as the Court may deem appropriate.

EVEY, ROUTH, BLACK, DOREZAS,
MAGEE & LEVINE LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

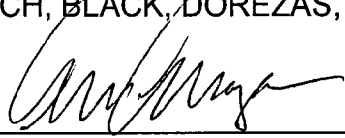
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 18 day of NOV., 2004, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

9
September 9, 2003

James B. Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

In re: Tracy Yarger v Megan Srock
Amanda Coover v Megan Srock

Dear Attorney Cole:

I served written discovery in both of these cases on April 15, 2003, but have not yet received Plaintiffs' response. I have no medical documentation of your clients' injuries. Please answer the written discovery within the next thirty (30) days.

Thank you for your courtesy.

Sincerely,

Michael B. Magee

MBM:cl

12
December 11, 2003

James B. Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

In re: Tracy Yarger v Megan Srock
Amanda Coover v Megan Srock

Dear Jim:

On April 15, 2003, I sent you written discovery for both cases. I do not believe you have yet sent me the answers. I will have to file a Motion to Compel unless the discovery is answered within the next ten days.

Thank you for your courtesy.

Sincerely,

Michael B. Magee

MBM:cl
bcc: Paul Slein 38 J334 759

21
August 26, 2004

James B. Cole, Esquire
2100 Law & Finance Building
Pittsburgh, PA 15219

In re: Tracy Yarger v Megan Srock
Amanda Coover v Megan Srock

Dear Jim:

This will confirm our telephone conversation of August 26, 2004. I served written discovery April 2003, which has not yet been answered. Please provide your client's answers to this discovery within the next twenty days. Otherwise, I will have to file a Motion to Compel.

Thank you for your courtesy.

Sincerely,

Michael B. Magee

MBM:cl

CA

AMANDA COOVER : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY,
 : PENNSYLVANIA
v. :
 : No. 02-1589 CD
MEGAN SROCK, :
Defendant :

ORDER OF COURT

AND NOW, this 7 day of December, 2004, upon
consideration of the Motion to Compel filed on behalf of
Defendant, Megan Srock, it is hereby ORDERED, ADJUDGED and
DECREED as follows:

1. The Plaintiff shall within thirty (30) days of
the date of this Order file full, complete and responsive
Answers to Defendant's Interrogatories; and

2. The Plaintiff shall within thirty (30) days of
the date of this Order file a written response to the
Defendant's Request for Production of Documents and produce
all requested documents.

BY THE COURT,

FILED ^{2cc}
10/35/04
DEC 07 2004
Atty Magee

William A. Shaw
Prothonotary/Clerk of Courts

Paul C. Cunningham
JUDGE

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY,
: PENNSYLVANIA
:
: No. 02-1589 CD
:
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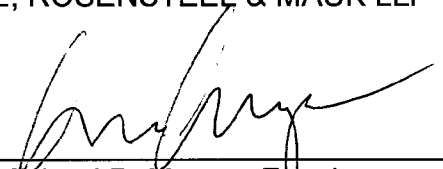
PRAECIPE FOR TRIAL LIST

TO THE PROTHONOTARY:

Please place this case on the next available Civil Trial List.

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED ^{NO cc}
JUN 07 2006
William A. Shaw
Prothonotary/Clerk of Courts

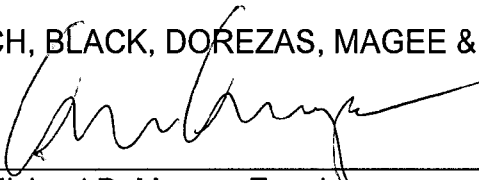
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 11 day of June, 2006, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, ROUTCH, BLACK, DOREZAS, MAGEE & LEVINE LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

LA

[illegible]

Plaintiff,

VS.

Filed on behalf of:
Plaintiff

[illegible]

Defendant.

(412) 391-0800

FILED *no cc*
JUL 28 2006
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

Defendant.

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No. 02-1589 CD

**MOTION TO REMOVE FROM TRIAL LIST
AND TRANSFER TO ARBITRATION**

The plaintiff moves the Court for an order removing this case from the trial list and transferring the case to arbitration. In support thereof the following is averred:

1. This is an action requesting money damages as compensation for injuries suffered in a motor vehicle accident.
2. The subject accident was a low speed collision that occurred in a parking lot.
3. The case is scheduled for call on the trial list on July 27, 2006.
4. Counsel for the parties have conferred and have agreed that the nature of the injuries are such that the matter is appropriate for arbitration.

WHEREFORE, the plaintiff requests that an order be entered transferring the within action to arbitration.

STOKES LURIE COLE & HENS-GRECO

By



James B. Cole, Esquire
Attorney for plaintiff

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

AMANDA COOVER,

Plaintiff,

vs.

MEGAN SROCK,

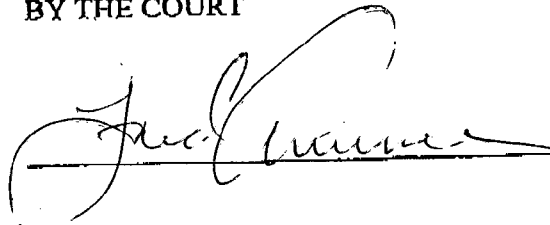
Defendant.

No. 02-1589 CD

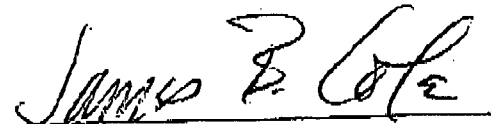
CONSENT ORDER TRANSFERRING CASE TO ARBITRATION

AND NOW, this 28 day of July, 2006, upon consent of the parties, it is
hereby ordered that this matter is transferred to arbitration.

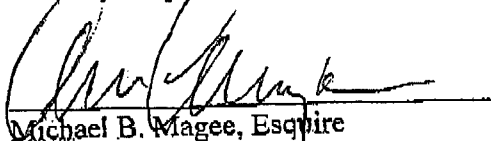
BY THE COURT

 J.

CONSENTED TO:



James B. Cole, Esquire
Attorney for plaintiff



Michael B. Magee, Esquire
Attorney for defendant

FILED

0/3:47 LM

JUL 31 2006 @

200 AMY Cole

William A. Shaw
Prothonotary

DATE 7-31-06

☒ You are responsible for serving all appropriate parties.

☐ The Processors office has provided service to the following parties:

☐ Plaintiff(s) ☐ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) ☐ Defendant(s) Attorney

☐ Other Instructions:

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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No. 02-1589 CD

**DEFENDANT'S NOTICE PURSUANT TO
PA.R.C.P. 1305**

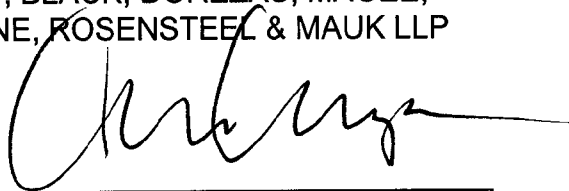
Pursuant to Pa.R.C.P. 1305, Defendant does hereby give Plaintiff notice
of her intention to introduce into evidence the following:

- a. Photographs of vehicles.
- b. Plaintiff's pre and post accident medical records.

Copies of all exhibits Defendant intends to introduce into evidence have
been provided to Plaintiff's counsel.

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED

NOV 20 2006

M 11:40/w
William A. Shaw

Prothonotary/Clerk of Courts

3 CEnt TO Atty

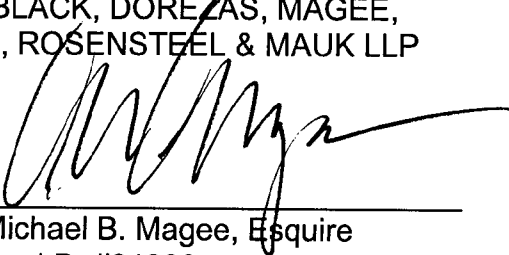
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 17 day of Nov., 2006, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

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

AMANDA COOVER

vs.

MEGAN SROCK

TRACY YARGER

vs.

MEGAN SROCK

:
:
: No. 02-1589-CD
:
:
:
: No. 02-520-CD
:
:

ORDER

NOW, this 22nd day of November, 2006, it is the ORDER of the Court
that the above-captioned matter is scheduled for Arbitration on **Tuesday, December 19, 2006**
at 9:00 A.M. The following have been appointed as Arbitrators:

Frederick M. Neiswender, Esquire, Chairman

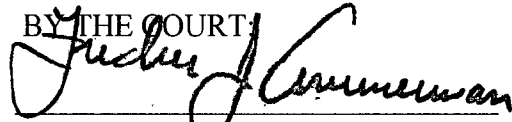
Warren B. Mikesell, II, Esquire

Patrick Lavelle, Esquire

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

Please report to Hearing Room No. 3, 2nd Floor, Clearfield County Courthouse,
Clearfield, PA.

BY THE COURT:



FREDRIC J. AMMERMAN

President Judge

FILED

NOV 22 2006

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Amanda Coover
vs.
Megan Srock

No. 2002-01589-CD

OATH OR AFFIRMATION OF ARBITRATORS

Now, this 19th day of December, 2006, we the undersigned, having been appointed arbitrators in the above case do hereby swear, or affirm, that we will hear the evidence and allegations of the parties and justly and equitably try all matters in variance submitted to us, determine the matters in controversy, make an award, and transmit the same to the Prothonotary within twenty (20) days of the date of hearing of the same.

Frederick M. Neiswender, Esq.

Warren B. Mikesell, II, Esq.
Patrick Lavelle, Esq.

Frederick M. Neiswender
Chairman
Warren B. Mikesell, II
Patrick Lavelle

Sworn to and subscribed before me this
December 19, 2006

William A. Shaw
Prothonotary

AWARD OF ARBITRATORS

Now, this 19th day of December 2006, we the undersigned arbitrators appointed in this case, after being duly sworn, and having heard the evidence and allegations of the parties, do award and find as follows:

In favor of Defendant, Megan Srock.

FILED
01/12/43/201
DEC 19 2006

Notices to
Amys Cole
and Magae
with their exhibits

WAS
William A. Shaw
Prothonotary/Clerk of Courts

(Continue if needed on reverse.)

Frederick M. Neiswender
Chairman
Warren B. Mikesell, II
Patrick Lavelle

ENTRY OF AWARD

Now, this 19th day of December, 2006, I hereby certify that the above award was entered of record this date in the proper dockets and notice by mail of the return and entry of said award duly given to the parties or their attorneys.

WITNESS MY HAND AND THE SEAL OF THE COURT

William A. Shaw
Prothonotary

By _____

Amanda Coover

Vs.

Megan Srock

: IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY

: No. 2002-01589-CD

:



NOTICE OF AWARD

TO: JAMES B. COLE

You are herewith notified that the Arbitrators appointed in the above case have filed their award in this office on December 19, 2006, and have awarded:

In favor of Defendant, Megan Srock.

William A. Shaw

Prothonotary

By

December 19, 2006

Date

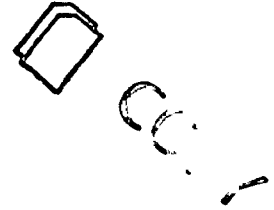
In the event of an Appeal from Award of Arbitration within thirty (30) days of date of award.

Amanda Coover

Vs.

Megan Srock

: IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY
: No. 2002-01589-CD
:



NOTICE OF AWARD

TO: MICHAEL B. MAGEE

You are herewith notified that the Arbitrators appointed in the above case have filed their award in this office on December 19, 2006, and have awarded:

In favor of Defendant, Megan Srock.

William A. Shaw

Prothonotary

By

Handwritten signature of William A. Shaw over a horizontal line.

December 19, 2006

Date

In the event of an Appeal from Award of Arbitration within thirty (30) days of date of award.

CA

AMANDA COOVER	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	CLEARFIELD COUNTY,
	:	PENNSYLVANIA
v.	:	
	:	No. 02-1589 CD
MEGAN SROCK,	:	
Defendant	:	

TRACY YARGER	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	CLEARFIELD COUNTY,
	:	PENNSYLVANIA
v.	:	
	:	No. 02-520-CD
MEGAN SROCK,	:	
Defendant	:	

DEFENDANT'S ARBITRATION MEMORANDUM

A. STATEMENT OF DEFENSE

This is a personal injury action arising from a two vehicle accident which occurred in the Ames Plaza parking lot in Philipsburg, Pennsylvania, at approximately 3:13 p.m. on April 8, 2000. Defendant was backing her automobile out of a parking space when the rear of her vehicle struck Plaintiff's vehicle as Plaintiff Yarger operated that vehicle behind Defendant's vehicle. Plaintiff Coover was a passenger in Plaintiff Yarger's vehicle.

Defendant contends the impact of the vehicles was minor, resulting in no injury to any of the occupants of the vehicles. At the accident scene, Plaintiffs denied they had been injured. It is Defendant's position that any medical care received by Plaintiffs after the accident was due to pre-existing problems Plaintiffs suffered.

RECEIVED
DEC 07 2006
CLERK ADMINISTRATOR'S
OFFICE

B. APPLICABLE STATUTES

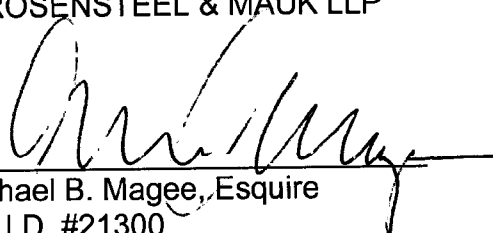
This case is governed by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S.A. 1701 et seq.

C. LIST OF WITNESSES

1. The parties
2. Defendant intends to introduce medical records and reports of Plaintiffs. Each party has notified the other, pursuant to Pa.R.C.P. 1305 of the records intended to be introduced.
3. Defendant intends to introduce photographs of the involved vehicles.

Respectfully submitted,
EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 6 day of Dec., 2006, by first-class United States

Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

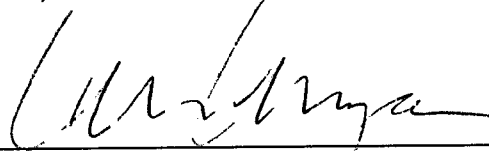
Frederick M. Neiswender, Esquire
501 E. Market, St. #3
Clearfield, PA 16830

Warren B. Mikesell, II, Esquire
115 E. Locust Street
Clearfield, PA 16830

Patrick Lavelle, Esquire
1000 S. State Street
Clarks Summit, PA 18411

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By



Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

EVEY ♦ BLACK

ATTORNEYS

401-03 ALLEGHENY STREET
P. O. BOX 415
HOLLIDAYSBURG, PA 16648
(814) 695-7581
FAX: (814) 695-1750

ROARING SPRING OFFICE:
99 NASON DRIVE
P. O. BOX 5
ROARING SPRING, PA 16673
(814) 224-5162

REPLY TO HOLLIDAYSBURG OFFICE

CLYDE O. BLACK, II BENJAMIN I. LEVINE, JR.
J. MICHAEL DOREZAS MICHAEL B. MAGEE
AMY ORR ROSENSTEEL KATHY J. MAUK
WILLIAM R. BRENNER NATHAN W. KARN, SR.
JEFFREY A. MURICEAK

WWW.EVEYBLACK.COM

MERLE K. EVEY
OF COUNSEL

November 29, 2006

Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830

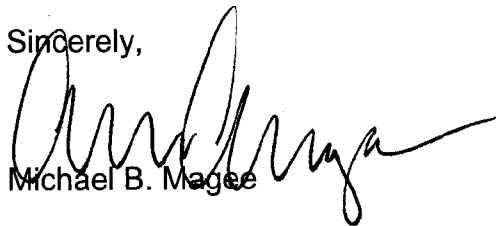
In re: Tracy Yarger v. Megan Srock
No. 02-520-CD
Amanda Coover v Megan Srock
No. 02-1589 CD

Dear Court Administrator:

Please find enclosed Defendant's Pre-Arbitration Memorandum, copies of which have been sent to opposing counsel and the members of the Arbitration Panel.

Thank you for your courtesy.

Sincerely,



Michael B. Magee

MBM:cl
Enc.

EVEY, BLACK, DOREZAS, MAGEE, LEVINE, ROSENSTEEL & MAUK LLP

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Defendant.

(412) 391-0800

ADMINISTRATOR'S
OFFICE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMANDA COOVER,	:	
	:	
Plaintiff,	:	No. 02-1589 CD
	:	
vs.	:	
	:	
MEGAN SROCK,	:	
	:	
Defendant.	:	

PLAINTIFF'S ARBITRATION PRE-TRIAL STATEMENT

Statement of the Case

This is an action requesting money damages as compensation for injuries suffered as a result of an automobile accident that happened April 8, 2000 in Philipsburg, Pennsylvania. The plaintiff was a passenger in a motor vehicle operated by Tracy Yarger in the Ames parking lot when the defendant negligently backed her vehicle out of a parking space and collided with the Yarger vehicle on the driver's side, thereby injuring the plaintiff. As a result of the collision the plaintiff suffered strain, sprain, injury and damage to the muscles, ligaments nerves and tissues of the cervical, thoracic and lumbar spine, including the cervical brachial plexus.

Applicable Case or Statutes

The plaintiff's claim is based upon principles of common law negligence.

List of Witnesses

The following witnesses may be called:

- Amanda Coover, plaintiff herein

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Arbitration Pre-Trial Statement was served upon the counsel for defendant by first class mail, postage prepaid, this 6th day of December, 2006.

TO: Michael B. Magee, Esquire
Evey, Black
401-03 Allegheny Street
P.O. Box 415
Hollidaysburg, PA. 16648-0415


with copies to:

John R. Ryan, Esquire
Belin & Kubista
15 North Front Street
Clearfield, PA 16830

Warren B. Mikesell, II, Esquire
Mikesell & Mikesell
115 E. Locust street
Clearfield, PA 16830

Frederick M. Neiswender, Esquire
Neiswender & Kubista
211 ½ North 2nd Street
Clearfield, PA 16830

STOKES LURIE COLE & HENS-GRECO, P.C.

By: 
James B. Cole
Attorneys for Plaintiff

- Tracy Yarger
301 Sylvan Circle
Tyrone, PA 16686
- Megan Srock, defendant herein

Statement of Damages

An award will be sought for pain suffering and inconvenience. There is no claim for lost earnings or for medical expense. Records of Kornel Lukacs, M.D. and William Schroeder will be offered.

STOKES LURIE COLE & HENS-GRECO, P.C.

By James B. Cole
James B. Cole
Attorneys for Plaintiff

AMANDA COOVER
Plaintiff

v.

MEGAN SROCK,
Defendant

: IN THE COURT OF COMMON PLEAS
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No. 02-1589 CD

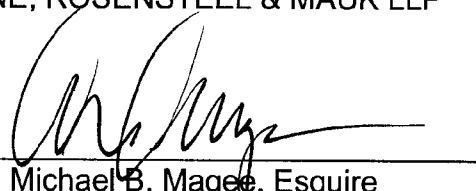
**PRAECIPE FOR ENTRY OF JUDGMENT
ON THE AWARD OF ARBITRATORS**

TO THE PROTHONOTARY:

Please enter judgment on the Award of the Arbitrators of December 19,
2006.

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

FILED No CC
m12:54/64 Atty Magee
JAN 24 2007 pd. 20.00

William A. Shaw
Prothonotary/Clerk of Courts
Notice to
James Cole (Atty-
Plaintiff)
(60)

Amanda Coover

Vs.

Megan Srock

: IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY
: No. 2002-01589-CD
:

NOTICE OF AWARD

TO: MICHAEL B. MAGEE

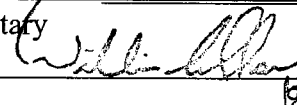
You are herewith notified that the Arbitrators appointed in the above case have filed their award in this office on December 19, 2006, and have awarded:

In favor of Defendant, Megan Srock.

William A. Shaw

Prothonotary

By



December 19, 2006

Date

In the event of an Appeal from Award of Arbitration within thirty (30) days of date of award.

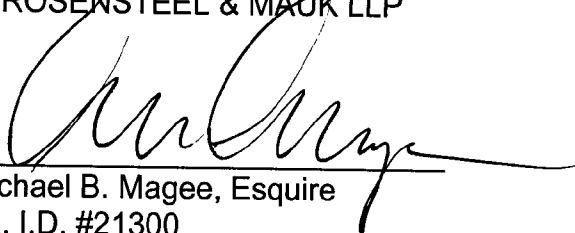
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 22 day of Jan, 2007, by first-class United States Mail, postage pre-paid, addressed to the following:

James B. Cole, Esquire
Stokes Lurie Cole & Hens-Greco, P.C.
2100 Law & Finance Building
Pittsburgh, PA 15219

EVEY, BLACK, DOREZAS, MAGEE,
LEVINE, ROSENSTEEL & MAUK LLP

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, PA 16648
(814) 695-7581

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

Amanda Coover

Vs.

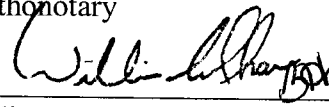
No. 2002-01589-CD

Megan Srock

To: Amanda Coover
C/o James Cole, Esq.

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you on January 24, 2007.

William A. Shaw
Prothonotary



William A. Shaw