

02-1851-CD  
RONALD NORTHRUP vs. LINDA MOORE, et al

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	Type of Case: Civil Action
Plaintiff	
-vs-	No. 02-1851-CD
LINDA MOORE, individually,	Type of Pleading:
LINDA MOORE, as agent on	Praecipe for
behalf of LEZZER GARDEN	Discontinuance
CENTER, LINDA MOORE,	
d/b/a LEZZER GARDEN CENTER,	Filed on Behalf of:
and LEZZER GARDEN CENTER,	Plaintiff
Defendants	
	Counsel of Record for This
	Party:
	Richard H. Milgrub, Esq.
	Supreme Court No. 19865
	211 North Second Street
	Clearfield, PA 16830
	(814) 765-1717

FILED

NOV 13 2003

William A. Shaw  
Prothonotary/Clerk of Courts

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

DONALD NORTHROP,  
Plaintiff

-vs-

No. 02-1851-CD

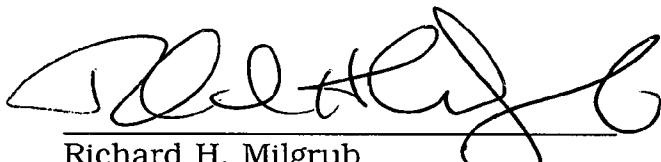
LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**PRAECIPE FOR DISCONTINUANCE**

TO THE PROTHONOTARY:

Kindly mark the above referenced matter settled and  
discontinued.

Dated: 11/12/03

  
\_\_\_\_\_  
Richard H. Milgrub  
Attorney for Plaintiff

FILED No cc  
Oct 31 2003 certificate of disc.  
Nov 13 2003 to Atty Milgrub  
William A. Shaw  
Prothonotary/Clerk of Courts  
copy to CIA  
LAW  
LAW

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Ronald Northrop

Vs.

No. 2002-01851-CD

Linda Moore, individually,  
Linda Moore, as agent on behalf  
of Lezzer Garden Center,  
Linda Moore, d/b/a Lezzer Garden Center,  
and Lezzer Garden Center

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 November 13,  
2003, marked:

Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by Richard H. Milgrub, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at  
Clearfield, Clearfield County, Pennsylvania this 13th day of November A.D. 2003.

---

William A. Shaw, Prothonotary

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

RONALD NORTHROP,  
Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE d/b/a  
LEZZER GARDEN CENTER and  
LEZZER GARDEN CENTER,  
Defendants

\*  
\*  
\*  
\* No. 2002-1851-cp

\* JURY TRIAL DEMANDED

Type of Action:  
Personal Injury

Type of Pleading:  
Praecipe for Writ  
of Summons

Filed on Behalf of:  
Plaintiff

Counsel of Record for this  
Party:

Richard H. Milgrub, Esquire  
Supreme Court I.D. 19865

211 North Second Street  
Clearfield, PA 16830  
(814) 765-1717

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

FILED

NOV 25 2002  
6/2:15 AM 80

William A. Shaw  
Prothonotary/Clerk of Courts  
W.O. CLEANS.

I WANT TO ATT

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

RONALD NORTHROP,	*
Plaintiff	*
	*
	*
-vs-	*
	No.
LINDA MOORE, individually,	*
LINDA MOORE, as agent on	*
behalf of LEZZER GARDEN	*
CENTER, LINDA MOORE d/b/a	*
LEZZER GARDEN CENTER and	*
LEZZER GARDEN CENTER,	*
Defendants	*

JURY TRIAL DEMANDED

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

Please issue a Writ of Summons upon:

Linda Moore  
Linda Moore, as agent for Lezzer Garden Center  
Linda Moore d/b/a Lezzer Garden Center  
Lezzer Garden Center  
420 North Fourth Street  
DuBois, PA 15801

11/25/02

By

  
Richard H. Milgrub, Esquire  
Attorney for Plaintiff

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

FILED

NOV 25 2002

William A. Shaw  
Prothonotary/Clerk of Courts

RICHARD H. MILGRUB  
*Attorney & Counselor at Law*

211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830

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

**SUMMONS**

**Ronald Northrop**

**Vs.**

**NO.: 2002-01851-CD**

**Linda Moore, individually,  
Linda Moore, as agent on behalf  
of Lezzer Garden Center, Linda  
Moore d/b/a Lezzer Garden Center  
and Lezzer Garden Center**

**TO: LINDA MOORE  
LEZZER GARDEN CENTER**

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 11/25/2002

---

**William A. Shaw  
Prothonotary**

**Issuing Attorney:  
Richard H. Milgrub  
211 North 2nd Street  
Clearfield, PA 16830**

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	Plaintiff	Type of Case: Civil Action
-vs-		No. 02-1851-CD
LINDA MOORE, individually, LINDA MOORE, as agent on behalf of LEZZER GARDEN CENTER, LINDA MOORE, d/b/a LEZZER GARDEN CENTER, and LEZZER GARDEN CENTER, Defendants		Type of Pleading: Praecipe for Entry of Appearance
		Filed on Behalf of: Defendants
		Counsel of Record for This Party: Matthew B. Taladay, Esq. Supreme Court No. 49663 Hanak, Guido and Taladay 498 Jeffers Street P.O. Box 487 DuBois, PA 15801 (814) 371-7768

FILED

DEC 09 2002  
11/8/02 10:00 AM  
William A. Shaw  
Prothonotary  
No. 410  


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

DONALD NORTHRUP,  
Plaintiff

-vs-

No. 02-1851-CD

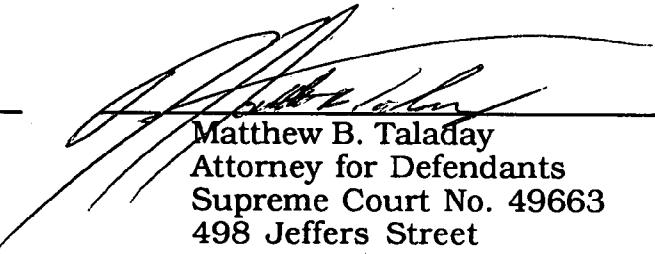
LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE, d/b/a  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**PRAECIPE FOR ENTRY OF APPEARANCE**

TO THE PROTHONOTARY:

Kindly enter my appearance for the Defendants in the  
above captioned matter.

Dated: 12-05-02

  
Matthew B. Taladay  
Attorney for Defendants  
Supreme Court No. 49663  
498 Jeffers Street  
P. O. Box 487  
DuBois, PA 15801  
(814) 371-7768

cc: Richard H. Milgrub, Esq.  
211 North Second Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	:	Type of Case: Civil Action
Plaintiff	:	No. 02-1851-CD
 -vs-		
LINDA MOORE, individually, LINDA MOORE, as agent on behalf of LEZZER GARDEN CENTER, LINDA MOORE, d/b/a LEZZER GARDEN CENTER, and LEZZER GARDEN CENTER, Defendants	:	Type of Pleading:  Praecipe for Rule to File Complaint
	:	Filed on Behalf of:  Defendants
	:	Counsel of Record for This Party:
	:	Matthew B. Taladay, Esq. Supreme Court No. 49663 Hanak, Guido and Taladay 498 Jeffers Street P.O. Box 487 DuBois, PA 15801
	:	(814) 371-7768

**FILED**

DEC 19 2002

William A. Shaw  
Prothonotary

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

DONALD NORTHROP,

Plaintiff

-vs-

No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

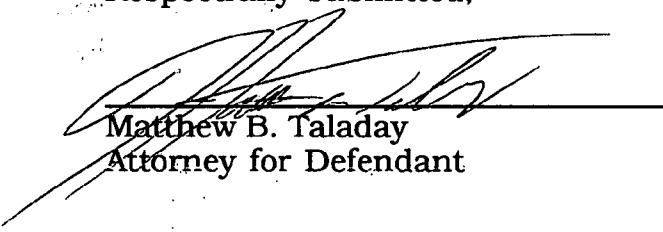
**PRAECIPE FOR RULE TO FILE COMPLAINT**

TO THE PROTHONOTARY:

Kindly issue a Rule to File Complaint upon the Plaintiff in  
the above referenced matter. Please serve this Rule upon Plaintiff's  
Attorney of Record.

Respectfully submitted,

Dated: 12-18-02

  
Matthew B. Taladay  
Attorney for Defendant

22

**FILED**

1 Rule issued

371253-21  
DEC 19 2002

*E. Hall*

William A. Shaw  
Prothonotary

**COPY**

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

Donald Northrop

Vs.  
Linda Moore, individually,  
Linda Moore, as agent on behalf  
of Lezzer Garden Center, Linda  
Moore, d/b/a Lezzer Garden Center,  
and Lezzer Garden Center

Case No. 2002-01851-CD

RULE TO FILE COMPLAINT

TO: Donald Northrop

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 A. Shaw, Prothonotary

Dated: December 19, 2002

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	:	Type of Case: Civil Action
Plaintiff	:	No. 02-1851-CD
 -vs-		
LINDA MOORE, individually, LINDA MOORE, as agent on behalf of LEZZER GARDEN CENTER, LINDA MOORE, d/b/a LEZZER GARDEN CENTER, and LEZZER GARDEN CENTER, Defendants	:	Type of Pleading:  Certificate of Service
	:	Filed on Behalf of:  Defendants
	:	Counsel of Record for This Party:
	:	Matthew B. Taladay, Esq. Supreme Court No. 49663 Hanak, Guido and Taladay 498 Jeffers Street P.O. Box 487 DuBois, PA 15801
	:	(814) 371-7768

**FILED**

DEC 27 2002

William A. Shaw  
Prothonotary

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

DONALD NORTHROP,  
Plaintiff

-vs-

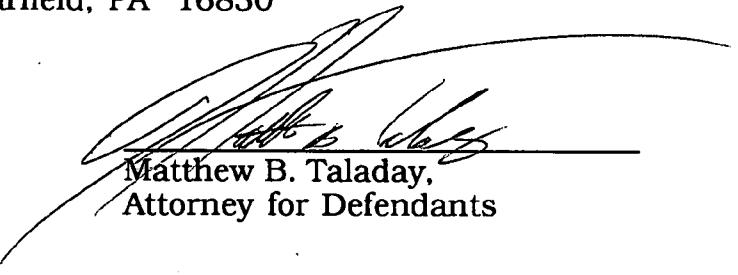
No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**CERTIFICATE OF SERVICE**

I certify that on the 26th day of December, 2002, a Court  
certified Rule to File Complaint was sent via first class mail, postage  
prepaid, to the following:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

  
Matthew B. Taladay,  
Attorney for Defendants

**FILED**

NO  
cc  
M 10:33 AM  
DEC 27 2006  
SAC

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,

Plaintiff

-vs-

LINDA MOORE, individually.  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER,  
and LEZZER GARDEN CENTER,  
Defendants

Type of Case: Civil Action

No. 02-1851-CD

Type of Pleading:

Notice of Praeclipe to  
Enter Judgment of Non Pos

Filed on Behalf of:

Defendants

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED

in 10:23 in No. cc  
JAN 24 2003

Notice to Plaintiff  
do attorney

William A. Shaw  
Prothonotary

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

DONALD NORTHROP,	Plaintiff	:
-vs-		No. 02-1851-CD
LINDA MOORE, individually,		:
LINDA MOORE, as agent on		:
behalf of LEZZER GARDEN		:
CENTER, LINDA MOORE,		:
d/b/a LEZZER GARDEN CENTER		:
and LEZZER GARDEN CENTER,		:
Defendants		:

**NOTICE OF PRAECIPE TO  
ENTER JUDGMENT OF NON PROS**

TO: DONALD NORTHROP  
c/o Richard H. Milgrub, Esq.

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR RIGHT TO SUE THE DEFENDANT AND THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

Court Administrator  
Clearfield County Courthouse  
230 E. Market Street  
Clearfield, PA 16830  
(814) 765-2641 Ext. 1303

Date: January 23, 2003

*Matthew B. Taladay*  
Matthew B. Taladay, Esq.  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
NON PROS

Ronald Northrop

Plaintiff

Vs.

No. 2002-01851-CD

Linda Moore  
Lezzer Garden Center

Defendant

TO: Ronald Northrop :

Notice is hereby given that a judgment of non-pros has been entered in the above captioned matter pursuant to Praeclipe dated January 24, 2003. A copy of said document is hereto attached.

Judgment entered of record January 24, 2003.

Sincerely,

William A. Shaw  
Prothonotary

Enclosures

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHRUP,

Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER,  
and LEZZER GARDEN CENTER,  
Defendants

Type of Case: Civil Action

No. 02-1851-CD

Type of Pleading:

Certificate of  
Service

Filed on Behalf of:

Defendants

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED  
M 10/23/08 NOCC  
JAN 24 2003

William A. Shaw  
Prothonotary

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

DONALD NORTHROP,  
Plaintiff

-vs-

No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**CERTIFICATE OF SERVICE**

I certify that on the 23rd day of January, 2003, a true and correct copy Notice of Praeclipe to Enter Judgment of Non Pros was sent via first class mail, postage prepaid, to the following:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

*Matthew B. Taladay*  
Matthew B. Taladay,  
Attorney for Defendants

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 13354

NORTHROP, RONALD

02-1851-CD

VS.

MOORE, LINDA, ind., Linda Moore, as agent on behalf of Lezzer Garden Ce

**SUMMONS**

**SHERIFF RETURNS**

**NOW NOVEMBER 26, 2002 AT 3:13 PM EST SERVED THE WITHIN SUMMONS ON  
LINDA MOORE, ind., Linda Moore as agent on behalf of Lezzer Garden  
Center, Linda Moore d/b/a Lezzer Garden Center and Lezzer Garden  
Center, DEFENDANT AT SHERIFF'S OFFICE, MARKET ST., CLEARFIELD,  
CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LINDA MOORE A TRUE  
AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN TO  
HER THE CONTENTS THEREOF.**

**SERVED BY: MORGILLO**

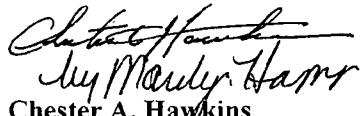
**Return Costs**

Cost	Description
19.37	SHFF. HAWKINS PD. BY: ATTY.
10.00	SURCHARGE PD. BY: ATTY.

Sworn to Before Me This

29th Day Of Jan, 2003  
William A. Shaw

So Answers,

  
Chester A. Hawkins  
Sheriff

**FILED**

JAN 29 2003

01/29/03 P.M.

William A. Shaw  
Prothonotary 

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

RONALD NORTHROP,  
Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE d/b/a  
LEZZER GARDEN CENTER and  
LEZZER GARDEN CENTER,  
Defendants

\*  
\*  
\*  
\* No. 02-1851-CD  
\* JURY TRIAL DEMANDED  
\*  
\*  
\*  
\*  
\*  
\*

Type of Action:  
Personal Injury

Type of Pleading:  
Complaint

Filed on Behalf of:  
Plaintiff

Counsel of Record for this  
Party:

Richard H. Milgrub, Esquire  
Supreme Court I.D. 19865

211 North Second Street  
Clearfield, PA 16830  
(814) 765-1717

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

FILED

JAN 30 2003  
6/3/00  
William A. Shaw  
Prothonotary/Clerk of Courts

1 CEN 70 AM

E  
A

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

RONALD NORTHRUP,	*
Plaintiff	*
	*
-vs-	* No. 02-1851-CD
	* JURY TRIAL DEMANDED
LINDA MOORE, individually,	*
LINDA MOORE, as agent on	*
behalf of LEZZER GARDEN	*
CENTER, LINDA MOORE d/b/a	*
LEZZER GARDEN CENTER and	*
LEZZER GARDEN CENTER,	*
Defendants	*

NOTICE

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

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

COURT ADMINISTRATOR  
Clearfield County Courthouse  
Second & Market Streets  
Clearfield, PA 16830  
(814) 765-2641

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

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

RONALD NORTHROP,	*
Plaintiff	*
	*
-vs-	* No. 02-1851-CD
	* JURY TRIAL DEMANDED
LINDA MOORE, individually,	*
LINDA MOORE, as agent on	*
behalf of LEZZER GARDEN	*
CENTER, LINDA MOORE d/b/a	*
LEZZER GARDEN CENTER and	*
LEZZER GARDEN CENTER,	*
Defendants	*

COMPLAINT

AND NOW, comes the Plaintiff, Ronald Northrop, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Complaint:

1. Plaintiff, Ronald Northrop, is a citizen of the Commonwealth of Pennsylvania, an adult individual, who resides at 5324 Bendigo Road, Wilcox, Pennsylvania 15870.

2. Defendant, Linda Moore, individually; Linda Moore as agent on behalf of Lezzer Garden Center; and Linda Moore d/b/a Lezzer Garden Center, is a citizen of the Commonwealth of Pennsylvania, an adult individual, who resides at 420 North Fourth Street, DuBois, Pennsylvania 15801.

3. The facts and occurrences hereinafter related took place on or about December 22, 2000, at approximately 1:20 p.m. on Beaver Drive, DuBois, Clearfield County, Pennsylvania.

4. At that time and place, Plaintiff, Ronald Northrop, was operating his vehicle in an easterly direction on Beaver Drive, DuBois, Pennsylvania.

5. At that time and place, the Defendant, Linda Moore, was operating her motor vehicle in an easterly direction on Beaver Drive, DuBois, Pennsylvania.

6. At that time and place, the Defendant, Linda Moore, caused the front portion of her vehicle to collide with the rear portion of the Plaintiff's vehicle.

7. The foregoing accident and all of the injuries and damages set forth hereinafter sustained by Plaintiff, Ronald Northrop, are the direct and proximate result of the negligent, careless, wanton and reckless manner in which Defendant, Linda Moore, operated her motor vehicle as follows:

a. failing to have to her vehicle under such control as to be able to stop within the assured clear distance ahead;

b. failing to keep alert and maintain a proper watch for the presence of other motor vehicles lawfully on the highway;

c. failing to apply her brakes in a sufficient time to avoid striking the rear of the Plaintiff's vehicle;

d. failing to travel at a safe speed;

e. failing to keep a proper watch for traffic on the highway;

f. failing to drive her vehicle with due regard to the highway and traffic conditions which were existing and of which she was or should have been aware;

g. failing to keep proper and adequate control of her vehicle; and

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

i. otherwise driving her vehicle upon the highway in a manner endangering persons and property and in a reckless manner with careless disregard to the rights and safety of others.

8. Plaintiff, Ronald Northrop, sustained painful and severe injuries, which include, but are not limited to: musculoskeletal thoracic scapular dysfunction, primarily of the rhomboid muscles.

9. By reason of the aforesaid injuries sustained by Plaintiff, Ronald Northrop, he was forced to incur liability for medical treatment, medications, hospitalizations, and similar miscellaneous expenses in an effort to restore himself to health and claim is made therefore.

10. Because of the nature of his injuries, Plaintiff, Ronald Northrop, has been advised and therefore avers that he may be forced to incur similar expenses in the future, and claim is made therefore.

11. As a result of the aforementioned injuries, Plaintiff, Ronald Northrop, has undergone and in the future will undergo great physical and mental suffering, great inconvenience in carrying out his daily activities, loss of life's pleasures and enjoyment, and claim is made therefore.

12. As a result of the aforesaid injuries, Plaintiff, Ronald Northrop, has been and in the future will be subject to great humiliation and embarrassment and claim is made therefore.

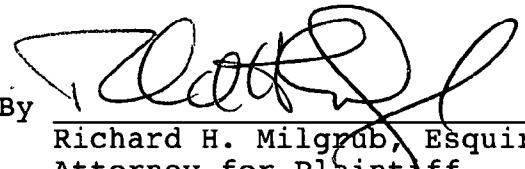
13. As a result of the aforesaid injuries, Plaintiff,

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830  
—  
109 NORTH BRADY STREET  
DUBOIS, PA 15801

Ronald Northrop, has sustained loss of opportunity and a permanent diminution in his earning power and capacity and claim is made therefore.

15. Plaintiff, Ronald Northrop, continues to be plagued by persistent pain and limitation and therefore, avers that his injuries may be of a permanent nature, causing residual problems the remainder of his lifetime and claim is made therefore.

WHEREFORE, Plaintiff, Ronald Northrop, demands judgment against the Defendants in an amount in excess of Twenty thousand dollars (\$20,000.00) exclusive of interest and costs and in excess of any jurisdictional amount requiring compulsory arbitration. JURY TRIAL DEMANDED.

By   
Richard H. Milgrub, Esquire  
Attorney for Plaintiff

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

VERIFICATION

I, Ronald Northrop, verify that the statements made herein are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Date: 1 / 29 / 03

\*Ron Northrop

Prothonotary/Clerk of Courts  
William A. Shaw

JAN 30 2003

FILED

RICHARD H. MILGRUB  
*Attorney & Counselor at Law*  
211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,  
Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER,  
and LEZZER GARDEN CENTER,  
Defendants

Type of Case: Civil Action

No. 02-1851-CD

Type of Pleading:

Answer and  
New Matter

Filed on Behalf of:

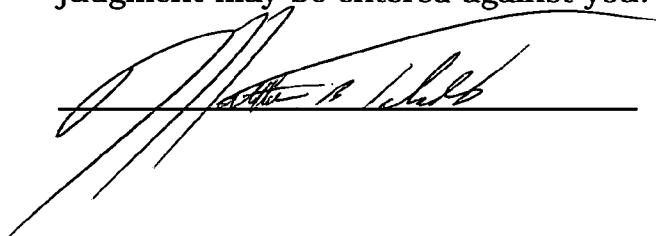
Defendants

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

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



**FILED**

*FEB 28 2003*

*William A. Shaw  
Prothonotary*

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

DONALD NORTHRUP,  
Plaintiff

-vs- : No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**ANSWER**

AND NOW, comes the Defendant, Linda Moore, individually  
and d/b/a Lezzer Garden Center, by her attorneys, Hanak, Guido and  
Taladay, and hereby responds to Plaintiff's Complaint as follows:

1. Admitted.
2. Denied as stated. It is admitted that Linda Moore is an adult individual who resides at 420 North Fourth Street, DuBois, Pennsylvania 15801. It is further admitted that Linda Moore does business as Lezzer Garden Center. The remaining averments of paragraph 2 are denied.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied as stated. It is admitted that the front portion of a vehicle operated by Linda Moore collided with the rear portion of a vehicle operated by the Plaintiff. It is denied that

Defendant Linda Moore intentionally "caused" her vehicle with that of Plaintiff.

7. Admitted in part and denied in part. It is admitted that Linda Moore is legally responsible for the collision involving her vehicle and that of Plaintiff. The remaining allegations of paragraph 7 are specifically denied.

8. After reasonable investigation, Defendant Linda Moore is without information sufficient to form a belief as to the truth of the averments of paragraphs 8 through 15 of Plaintiff's Complaint, therefore they are denied and strict proof thereof is demanded at the time of trial.

**NEW MATTER**

9. Plaintiff's claims are barred or limited by applications of Pennsylvania Motor Vehicle Financial Responsibility Law regarding limited tort coverage.

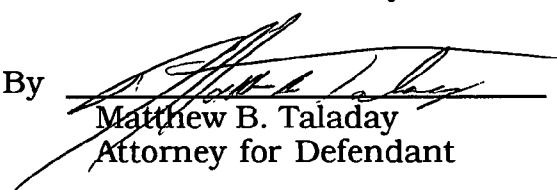
10. Plaintiff's claims are barred or limited by the applicable provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law concerning permissible economic damages.

WHEREFORE, Defendant demands judgment in her favor.

Respectfully submitted,

Hanak, Guido and Taladay

By

  
Matthew B. Taladay  
Attorney for Defendant

**VERIFICATION**

I, **Linda Moore**, do hereby verify that I have read the foregoing Answer & New Matter. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date: 2/22/03

Linda Moore  
Linda Moore

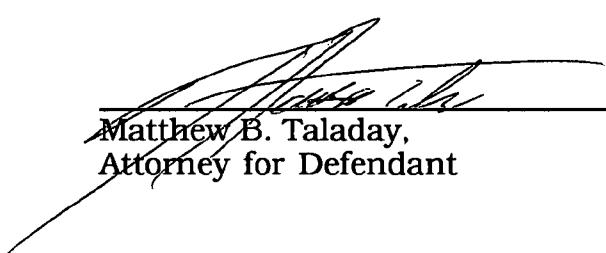
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

DONALD NORTHROP,	:	
	Plaintiff	:
 -vs-		
		No. 02-1851-CD
LINDA MOORE, individually,	:	
LINDA MOORE, as agent on	:	
behalf of LEZZER GARDEN	:	
CENTER, LINDA MOORE,	:	
d/b/a LEZZER GARDEN CENTER	:	
and LEZZER GARDEN CENTER,	:	
Defendants	:	

**CERTIFICATE OF SERVICE**

I certify that on the 27<sup>th</sup> day of February, 2003, a true and correct copy of Defendants' Answer and New Matter was sent via first class mail, postage prepaid, to the following:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

  
Matthew B. Taladay,  
Attorney for Defendant

**FILED**

NO  
CC

1049684  
FEB 28 2003  
2003

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHRUP,

Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER,  
and LEZZER GARDEN CENTER,  
Defendants

Type of Case: Civil Action

No. 02-1851-CD

Type of Pleading:

Certificate of  
Service

Filed on Behalf of:

Defendants

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

**FILED**

FEB 28 2003

William A. Shaw  
Prothonotary

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

DONALD NORTHRUP,  
Plaintiff

-vs-

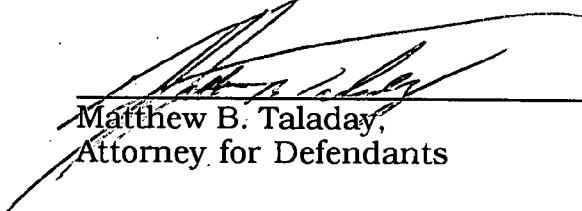
No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**CERTIFICATE OF SERVICE**

I certify that on the 27th day of February, 2003, an original  
Notice of Deposition, copy of which is attached hereto, was sent via  
first class mail, postage prepaid, to the following:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

  
Matthew B. Taladay,  
Attorney for Defendants

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

DONALD NORTHROP,  
Plaintiff

-vs-

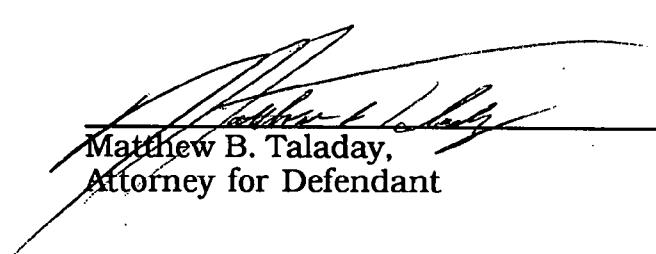
No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**NOTICE OF DEPOSITION**

TO: DONALD NORTHROP  
c/o Richard H. Milgrub, Esq.

TAKE NOTICE that your deposition by oral examination  
will be taken on **Tuesday, March 25 at 2:00 p.m.** at the law office of  
Richard Milgrub, 211 North Second Street, Clearfield, Pennsylvania.  
This deposition is being taken for the purpose of discovery and for use  
at trial, pursuant to the Pennsylvania Rules of Civil Procedure  
regarding Discovery.

  
Matthew B. Taladay,  
Attorney for Defendant

cc: Schreiber Reporting Service

**FILED**

NO

10-49-81

Ce

M  
FEB 28 2003

2003

2003

cc  
FEB

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	Type of Case:	Civil Action
Plaintiff	No. 02-1851-CD	
-vs-	Type of Pleading:	
LINDA MOORE, individually, LINDA MOORE, as agent on behalf of LEZZER GARDEN CENTER, LINDA MOORE, d/b/a LEZZER GARDEN CENTER, and LEZZER GARDEN CENTER,	Notice of Service	
Defendants	Filed on Behalf of:	
	Defendants	
	Counsel of Record for This Party:	
	Matthew B. Taladay, Esq. Supreme Court No. 49663 Hanak, Guido and Taladay 498 Jeffers Street P.O. Box 487 DuBois, PA 15801	
	(814) 371-7768	

**FILED**

MAR 05 2003

William A. Shaw  
Prothonotary

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

DONALD NORTHRUP,  
Plaintiff

-vs-

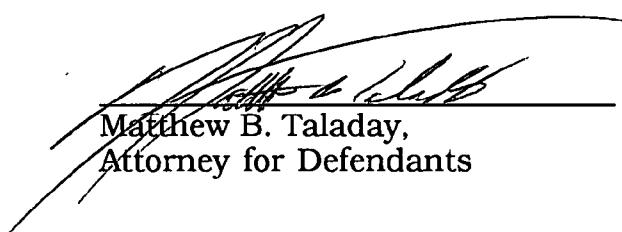
No. 02-1851-CD

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE,  
d/b/a LEZZER GARDEN CENTER  
and LEZZER GARDEN CENTER,  
Defendants

**NOTICE OF SERVICE**

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being  
counsel of record for Defendants, do hereby certify that I propounded  
on Plaintiff, via United States mail, first class, postage pre-paid, this  
4th day of March, 2003, Defendants' RESPONSES TO DISCOVERY  
REQUESTS to the below indicated person, at said address, being  
counsel of record for the Plaintiff:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

  
Matthew B. Taladay,  
Attorney for Defendants

**FILED**

No cc

10:36 AM  
MAR 05 2003

8:05  
KJS

William A. Shaw  
Prothennetary

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

RONALD NORTHROP,  
Plaintiff

-vs-

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE, d/b/a  
LEZZER GARDEN CENTER, and  
LEZZER GARDEN CENTER,  
Defendants

\*  
\*  
\*  
\* No. 02-1851-CD  
\* JURY TRIAL DEMANDED

Type of Action:  
Personal Injury

Type of Pleading:  
Answer to New Matter

Filed on Behalf of:  
Plaintiff

Counsel of Record for this  
Party:

Richard H. Milgrub, Esquire  
Supreme Court I.D. 19865

211 North Second Street  
Clearfield, PA 16830  
(814) 765-1717

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

FILED

MAR 18 2003

William A. Shaw  
Prothonotary

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

RONALD NORTHRUP, \*  
Plaintiff \*  
\*  
-vs- \* No. 02-1851-CD  
\* JURY TRIAL DEMANDED  
LINDA MOORE, individually, \*  
LINDA MOORE, as agent on \*  
behalf of LEZZER GARDEN \*  
CENTER, LINDA MOORE, d/b/a \*  
LEZZER GARDEN CENTER, and \*  
LEZZER GARDEN CENTER, \*  
Defendants \*

ANSWER TO NEW MATTER

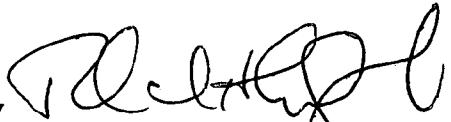
AND NOW, comes the Plaintiff, Ronald Northrop, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Answer to New Matter:

9. A conclusion of law to which no response is necessary.

10. A conclusion of law to which no response is necessary.

WHEREFORE, Plaintiff, Ronald Northrop, demands judgment against the Defendants in an amount in excess of Twenty thousand dollars (\$20,000.00) exclusive of interest and costs and in excess of any jurisdictional amount requiring compulsory arbitration. JURY TRIAL DEMANDED.

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830  
—  
109 NORTH BRADY STREET  
DUBOIS, PA 15801

By 

Richard H. Milgrub, Esquire  
Attorney for Plaintiff

I, Ronald Northrop, verify that the statements made in the foregoing are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: 3/17/03

Ron Northrop

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

1CC  
Amy Milgrub  
EPA

**FILED**  
03/15/03  
MAR 16 2003  
EPA

William A. Shaw  
Prothonotary

RICHARD H. MILGRUB  
*Attorney & Counselor-at-Law*

211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830

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

RONALD NORTHRUP, \*  
Plaintiff \*  
\*  
-vs- \* No. 02-1851-CD  
\* JURY TRIAL DEMANDED  
\*  
LINDA MOORE, individually, \*  
LINDA MOORE, as agent on \*  
behalf of LEZZER GARDEN \*  
CENTER, LINDA MOORE, d/b/a \*  
LEZZER GARDEN CENTER, and \*  
LEZZER GARDEN CENTER, \*  
Defendants \*

Type of Action:  
Personal Injury

Type of Pleading:  
Certificate of Service

Filed on Behalf of:  
Plaintiff

Counsel of Record for this  
Party:

Richard H. Milgrub, Esquire  
Supreme Court I.D. 19865

211 North Second Street  
Clearfield, PA 16830  
(814) 765-1717

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

**FILED**

MAR 19 2003

William A. Shaw  
Prothonotary

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

RONALD NORTHROP, \*  
Plaintiff \*  
\*  
-vs- \* No. 02-1851-CD  
\* JURY TRIAL DEMANDED  
LINDA MOORE, individually, \*  
LINDA MOORE, as agent on \*  
behalf of LEZZER GARDEN \*  
CENTER, LINDA MOORE, d/b/a \*  
LEZZER GARDEN CENTER, and \*  
LEZZER GARDEN CENTER, \*  
Defendants \*

CERTIFICATE OF SERVICE

I, Richard H. Milgrub, Esquire, do hereby certify that a certified copy of Plaintiff's Answer to New Matter was served upon the Defendant's attorney of record, Matthew B. Taladay, Esquire, PO Box 487, DuBois, Pennsylvania 15801, by depositing the same in the United States Postal Service this 19 day of March, 2003.

By   
Richard H. Milgrub, Esquire  
Attorney for Plaintiff

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

**FILED**

MAR 19 2003

0/2-42  
William A. Shaw  
Prothonotary

cc

RICHARD H. MILGRUB

*Attorney & Counselor at Law*

211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

DONALD NORTHROP,	Plaintiff	Type of Case: Civil Action
-vs-		No. 02-1851-CD
LINDA MOORE, individually,		Type of Pleading:
LINDA MOORE, as agent on		Notice of
behalf of LEZZER GARDEN		Service
CENTER, LINDA MOORE,		Filed on Behalf of:
d/b/a LEZZER GARDEN CENTER,		Defendants
and LEZZER GARDEN CENTER,		
Defendants		
		Counsel of Record for This
		Party:
		Matthew B. Taladay, Esq.
		Supreme Court No. 49663
		Hanak, Guido and Taladay
		498 Jeffers Street
		P.O. Box 487
		DuBois, PA 15801
		(814) 371-7768

**FILED**

APR 14 2003

William A. Shaw  
Prothonotary

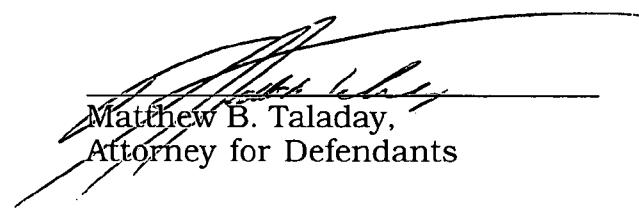
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

DONALD NORTHROP,	:	
	Plaintiff	:
 -vs-		No. 02-1851-CD
LINDA MOORE, individually,	:	
LINDA MOORE, as agent on	:	
behalf of LEZZER GARDEN	:	
CENTER, LINDA MOORE,	:	
d/b/a LEZZER GARDEN CENTER	:	
and LEZZER GARDEN CENTER,	:	
Defendants	:	

**NOTICE OF SERVICE**

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being counsel of record for Defendant, do hereby certify that I propounded on Plaintiffs, via United States mail, first class, postage pre-paid, this 11th day of April, 2003, Defendant's FIRST SET OF DISCOVERY MATERIALS to the below indicated person, at said address, being counsel of record for the Plaintiff:

Richard H. Milgrub, Esq.  
Attorney for Plaintiff  
211 North Second Street  
Clearfield, PA 16830

  
Matthew B. Taladay,  
Attorney for Defendants

6-12

FILED

NO  
cc

18:37-03  
APR 14 2003

ESB

William A. Shaw  
Prothonotary

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

FILED

JUN 0 C 2003

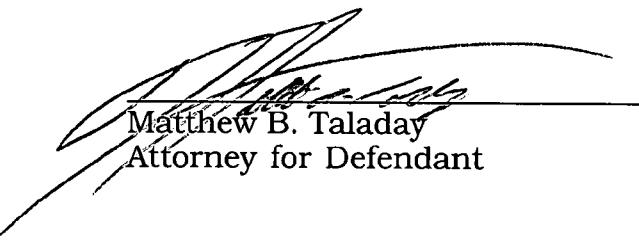
DONALD NORTHROP,	:	William A. Shaw
	:	Prothonotary
	:	
Plaintiff	:	
	:	
-vs-	:	No. 02-1851-CD
	:	
LINDA MOORE, individually,	:	
LINDA MOORE, as agent on	:	
behalf of LEZZER GARDEN	:	
CENTER, LINDA MOORE,	:	
d/b/a LEZZER GARDEN CENTER	:	
and LEZZER GARDEN CENTER,	:	
Defendants	:	

CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA  
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for the production of documents and things pursuant to Rule 4009.22, Plaintiff certifies that

1. A notice of intent to serve subpoena with a copy of subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the subpoena is sought to be served;
2. A copy of the notice, including the proposed subpoena, is attached to this certificate;
3. No objection to the subpoena has been received; and
4. The subpoena which will be served is identical to the one attached to the notice of intent to serve the subpoena.

Date: 6/05/03

  
Matthew B. Taladay  
Attorney for Defendant

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

DONALD NORTHROP,	:	
	Plaintiff	:
:		
-vs-	:	No. 02-1851-CD
:		
LINDA MOORE, individually,	:	
LINDA MOORE, as agent on	:	
behalf of LEZZER GARDEN	:	
CENTER, LINDA MOORE,	:	
d/b/a LEZZER GARDEN CENTER	:	
and LEZZER GARDEN CENTER,	:	
Defendants	:	

**NOTICE OF INTENT TO SERVE SUBPOENA  
TO PRODUCE DOCUMENTS AND THINGS  
FOR DISCOVERY PURSUANT TO RULE 4009.22**

Defendants, Linda Moore, individually and as agent on behalf of Lezzer Garden Center, Linda Moore, d/b/a Lezzer Garden Center and Lezzer Garden Center, intends to serve a subpoena identical to the one attached to this notice. You have twenty (20) days from the date listed below to file of record and serve upon the undersigned objections to the subpoena. If no objections are made, the subpoena may be served.

Date: 05/15/03

  
Matthew B. Taladay  
Attorney for Defendants  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801  
(814) 371-7768

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Ronald Northrop

\*

Plaintiff(s)

Vs.

\*

No. 2002-01851-CD

Linda Moore

\*

Lezzer Garden Center

Defendant(s)

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

TO: Pennsylvania Department of Transportation, Bureau of Motor Vehicle Registration  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Photocopies of all vehicle registration applications concerning a Honda Nighthawk motorcycle, VIN JH2RC1306DM000283, and motorcycle bearing PA License No. BEP80, (Address) VIN 36151123505, from February 1, 2000 to present to PO Box 487, DuBois, PA 15801.

You may deliver or mail legible copies of the documents or produce things requested 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 order compelling you to comply with it.

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

NAME: Matthew B. Taladay, Esq.

ADDRESS: 498 Jeffers St. PO Box 487  
DuBois PA 15801

TELEPHONE: (814) 371-7768

SUPREME COURT ID # 49663

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

DATE: Tuesday, May 13, 2003

Seal of the Court

Deputy

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

# FILED

JUL 07 2003 COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
CIVIL TRIAL LISTING

William A. Shaw

Prothonotary

## CERTIFICATE OF READINESS

TO THE PROTHONOTARY

02-1851-CD

DATE PRESENTED

CASE NUMBER	TYPE	TRIAL REQUESTED	ESTIMATED TRIAL TIME
-------------	------	-----------------	----------------------

Date Complaint (X) Jury ( ) Non-Jury  
Filed: 1/30/03 ( ) Arbitration 1 Days

### PLAINTIFF(S)

Ronald Northrop ( )

### DEFENDANT(S)

Linda Moore, Linda Moore as agent on behalf  
of Lezzer Garden Cetner, Linda Moore d/b/a ( ) Check Block if  
Lezzer Garden Center and Lezzer Garden Center a Minor is a  
Party to the  
Case  
( )

JURY DEMAND FILED BY:

DATE JURY DEMAND FILED:

Richard H. Milgrub, Esquire  
Attorney for Plaintiff

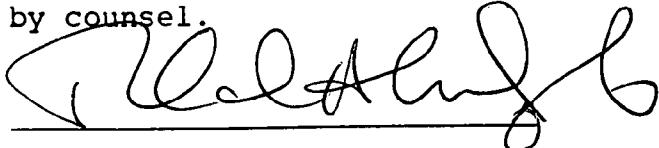
11/25/02

AMOUNT AT ISSUE	CONSOLIDATION	DATE CONSOLIDATION ORDERED
-----------------	---------------	----------------------------

more than  
\$ 20,000 ( ) yes ( / ) no

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.

I certify that all discovery in the case has been completed;  
all necessary parties and witnesses are available; serious  
settlement negotiations have been conducted; the case is ready in  
all respects for trial, and a copy of this Certificate has been  
served upon all counsel of record and upon all parties of record who  
are not represented by counsel.



FOR THE PLAINTIFF	TELEPHONE NUMBER
Richard H. Milgrub, Esquire	814-765-1717
FOR THE DEFENDANT	TELEPHONE NUMBER
Matthew B. Taladay, Esquire	814-371-7768
FOR ADDITIONAL DEFENDANT	TELEPHONE NUMBER

**FILED**  
01310-004  
JUL 07 2003  
Copy to CJA  
William A. Shaw  
Prothonotary



therapy, in the amount of \$274.00. The Defense has agreed to stipulate to the amount of the liens and the reasonableness of the charges. However the Defense has not stipulated to the issue of causation relative the expenses.

5. Any party making objections relative the testimony to be provided by any witness in the form of a deposition at the time of Trial shall submit said objections to the Court, in writing, no later than thirty (30) days prior to the commencement of Trial. All objections shall reference specific page and line numbers within the deposition(s) in question along with that party's brief relative same. The opposing party shall submit its brief in opposition to said objections no later than fifteen (15) days prior to the commencement of Trial.

6. Any party filing any Motion or Petition regarding limitation or exclusion of evidence or testimony to be presented at time of trial, including but not limited to Motions in Limine, shall file the same no more than thirty (30) days prior to the trial date. The party's Petition or Motion shall be accompanied by an appropriate brief. The responding party thereto shall file its Answer and submit appropriate response brief no later than fifteen (15) days prior to trial.

By the Court,



JUDGE FREDRIC J. AMMERMAN

**FILED**

AUG 15 2003

William A. Shaw  
Prothonotary  
Clerk to

X 2 certified copies to Richard H. Milgrub, Esquire  
X 2 certified copies to Matthew B. Taladay, Esquire  
1 copy to Judge Ammerman  
1 copy to Court Administrator

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

RONALD NORTHRUP,  
Plaintiff

vs.

LINDA MOORE, individually  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE d/b/a  
LEZZER GARDEN CENTER and  
LEZZER GARDEN CENTER,  
Defendants

\*  
\*  
\*  
\*  
\* No. 2002-1851-C.D.  
\*

O R D E R

NOW, this 18<sup>th</sup> day of August, 2003, it is the ORDER of this Court that this Court's Order of August 15, 2003 be amended in part as follows:

1. Jury Selection will be held on August 22, 2003 commencing at **11:00 a.m.** in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

By the Court,



JUDGE FREDRIC J. AMMERMAN

FILED

AUG 18 2003

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

012-15871  
AUG 18 2003

*WAS*

William A. Shaw  
Prothonotary/Clerk of Courts

2 certified copies to Richard H. Milgrub, Esquire  
2 certified copies to Matthew B. Taladay, Esquire  
1 copy to Judge Ammerman  
1 copy to Court Administrator

*WAS*

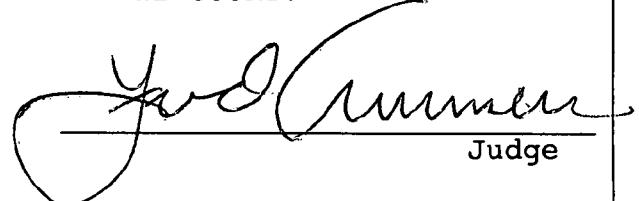
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

RONALD NORTHRUP,	*
Plaintiff	*
	*
-vs-	*
	No. 02-1851-CD
LINDA MOORE, individually,	*
LINDA MOORE, as agent on	*
behalf of LEZZER GARDEN	*
CENTER, LINDA MOORE d/b/a	*
LEZZER GARDEN CENTER and	*
LEZZER GARDEN CENTER,	*
Defendants	*

ORDER

AND NOW, this 19 day of August, 2003, upon  
consideration of the Plaintiff's Petition for Continuance, Jury  
Selection in the above matter is hereby continued from August 22,  
2003 until the next term of Court.

BY THE COURT:



Yvonne J. Currier  
Judge

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

FILED

AUG 20 2003

William A. Shaw  
Prothonotary/Clerk of Courts

FILED *icc*  
Aug 20 2003 *Aug 20 2003*  
William A. Shaw  
Prothonotary/Clerk of Courts

RICHARD H. MILGRUB  
*Attorney & Counselor-at-Law*  
211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830

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

RONALD NORTHRUP,  
Plaintiff

\*

\*

\*

-vs-

\* No. 02-1851-CD

\* JURY TRIAL DEMANDED

LINDA MOORE, individually,  
LINDA MOORE, as agent on  
behalf of LEZZER GARDEN  
CENTER, LINDA MOORE d/b/a  
LEZZER GARDEN CENTER and  
LEZZER GARDEN CENTER,  
Defendants

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

Type of Action:  
Personal Injury

Type of Pleading:  
Petition for Continuance

Filed on Behalf of:  
Plaintiff

Counsel of Record for this  
Party:

Richard H. Milgrub, Esquire  
Supreme Court I.D. 19865

211 North Second Street  
Clearfield, PA 16830  
(814) 765-1717

**FILED**

AUG 20 2003

William A. Shaw  
Prothonotary/Clerk of Courts

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

109 NORTH BRADY STREET  
DUBOIS, PA 15801

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

RONALD NORTHROP,	*
Plaintiff	*
	*
-vs-	* No. 02-1851-CD
	* JURY TRIAL DEMANDED
LINDA MOORE, individually,	*
LINDA MOORE, as agent on	*
behalf of LEZZER GARDEN	*
CENTER, LINDA MOORE d/b/a	*
LEZZER GARDEN CENTER and	*
LEZZER GARDEN CENTER,	*
Defendants	*

PETITION FOR CONTINUANCE

AND NOW, comes Your Petitioner, Ronald Northrop, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Petition:

1. Jury Selection in the above-captioned case had originally be scheduled for August 29, 2003.
2. Because of the limited amount of cases on schedule for Trial, Jury Selection was consolidated and scheduled for August 22, 3003.
3. Your Petitioner's attorney, Richard H. Milgrub, Esquire, had long-standing plans to be in Chicago, Illinois, that day.
4. Your Petitioner's attorney, Richard H. Milgrub, Esquire, has been representing Your Petitioner from the initiation of suit.
5. Although Your Petitioner's attorney, Richard H. Milgrub, Esquire, has another attorney in his office, Brian K.

Marshall, Esquire, Mr. Marshall has never selected a civil jury and Your Petitioner prefers that his attorney be present.

6. This is the first time that the case has been placed on the Trial List.

WHEREFORE, Your Petitioner respectfully requests that Jury Selection scheduled for August 22, 2003, be continued until the next term of Court.

By   
Richard H. Milgrub, Esquire  
Attorney for Plaintiff

THE LAW OFFICES OF  
RICHARD H. MILGRUB  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

—  
109 NORTH BRADY STREET  
DUBOIS, PA 15801

VERIFICATION

I, Richard H. Milgrub, have read the foregoing  
Petition for Continuance

The statements therein are correct to the best of my personal knowledge  
or information and belief.

This statement and verification is made subject to penalties of 18  
Pa. C.S. §4904 relating to unsworn falsification to authorities, which provides  
that if I make knowingly false averments, I may be subject to criminal  
penalties.

I am authorized to make this verification on behalf of  
Plaintiff

because of my position as counsel of record.



Richard H. Milgrub

Dated: 8/18/03

RICHARD H. MILGRUB  
ATTORNEY & COUNSELOR  
AT LAW  
211 NORTH SECOND STREET  
CLEARFIELD, PA 16830

111 NORTH BRADY STREET  
DUBOIS, PA 15801

cc  
RICHARD H. MILGRUB  
AUG 20 2003  
SAC  
William A. Shaw  
Prothonotary/Clerk of Courts

RICHARD H. MILGRUB  
*Attorney & Counselor at Law*

211 NORTH SECOND STREET  
CLEARFIELD, PENNSYLVANIA 16830