

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

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:

Praecipe for
Discontinuance

Filed on Behalf of:

Plaintiff

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

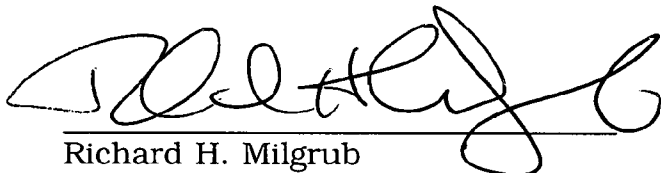
LINDA MOORE, individually,
LINDA MOORE, as agent on
behalf of LEZZER GARDEN
CENTER, LINDA MOORE,
d/b/a LEZZER GARDEN CENTER
and LEZZER GARDEN CENTER,
Defendants

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

03/21/2011
NOV 13 2003

Certificate of Disc.
to Atty. Milgrob

William A. Shaw
Prothonotary/Clerk of Courts

Copy to CIA

[Signature]

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

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

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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

0/2:15/125
William A. Shaw

Prothonotary/Clerk of Courts

NO CHG.

1 WRIT TO ATT

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

RONALD NORTHROP,
Plaintiff

-vs-

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No.

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

PRAECIPE FOR WRIT OF SUMMONS

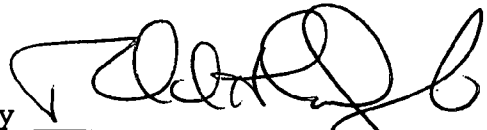
TO THE PROTHONOTARY:

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

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

-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:

Praecipe for
Entry of Appearance

Filed on Behalf of:

Defendants

Counsel of Record for This
Party:

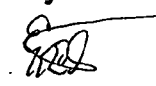
Matthew B. Taladay, Esq.
Supreme Court No. 49663
Hanak, Guido and Taladay
498 Jeffers Street
P.O. Box 487
DuBois, PA 15801

(814) 371-7768

FILED

DEC 09 2002

11/8/02/MS
William A. Shaw
Prothonotary

WAS C/C


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

DONALD NORTHROP,

Plaintiff

-vs-

No. 02-1851-CD

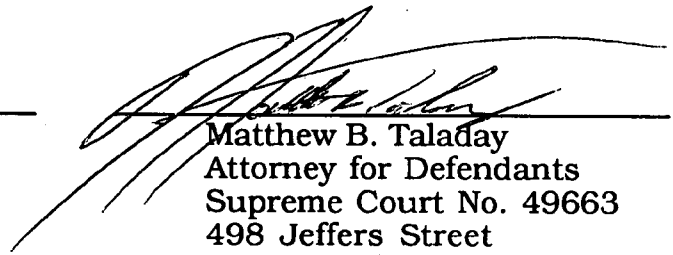
LINDA MOORE, individually,
LINDA MOORE, as agent on
behalf of LEZZER GARDEN
CENTER, LINDA MOORE, d/b/a
d/b/a LEZZER GARDEN CENTER
and LEZZER GARDEN CENTER,
Defendants

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,
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:

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

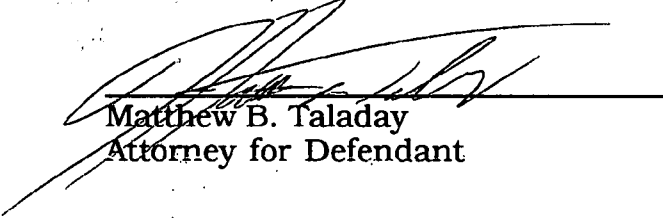
TO THE PROTHONOTARY:

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

FILED

Rule issued

3/12:53 PM
DEC 19 2002

to Any Today



William A. Shaw
Prothonotary

COPY

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

Donald Northrop

Vs.

Case 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

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,
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

DEC 27 2002

William A. Shaw
Prothonotary

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

DONALD NORTHROP,

Plaintiff

-vs-

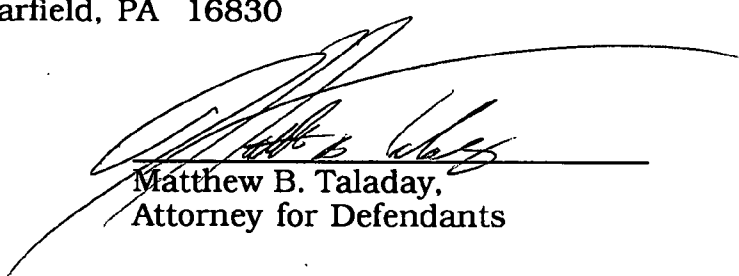
No. 02-1851-CD

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
ac

M/10:33:01
DEC 27 2002

~~8/20~~

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 Praecipe 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

m 10:23 AM NOCC
JAN 24 2003

*notice to Plaintiff
40 atty pro se*

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 Praecipe 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 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:

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 68 NOC

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 Praecipe 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
My Merly Hamr

Chester A. Hawkins
Sheriff

FILED

JAN 29 2003
0/2:05 p.m.
William A. Shaw
Prothonotary *WAS*

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

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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

FILED

JAN 30 2003

0/3100/w
William A. Shaw

Prothonotary/Clerk of Courts

1 sent to Amy

EJ
HED

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-

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

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

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

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

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: musculo-skeletal 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.

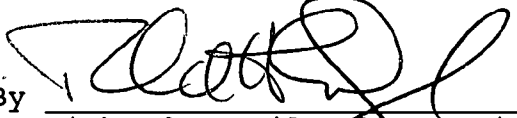
12. As a result of the aforesaid injuries, Plaintiff, Ronald Northrop, has been and in the future will be subject to great humiliation and embarrassment and claim is made therefore.

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

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

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

FILED

JAN 30 2003

William A. Shaw
Prothonotary/Clerk of Courts

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:

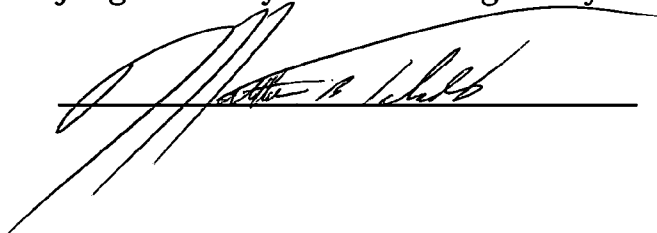
Defendants

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 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	:	

ANSWER

AND NOW, comes the Defendant, Linda Moore, individually and d/b/a Lezzar 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 Lezzar 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-

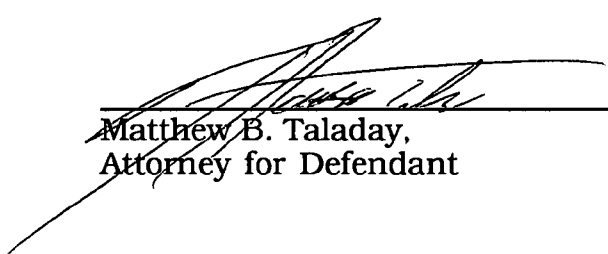
No. 02-1851-CD

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 27th 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

M 10:49 AM
FEB 28 2003

NO
CC

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:

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 NORTHROP,

Plaintiff

-vs-

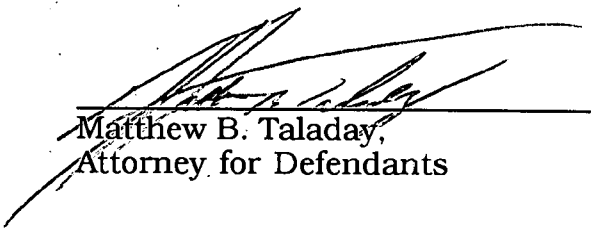
No. 02-1851-CD

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 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-

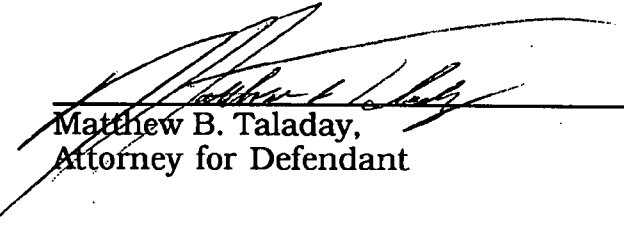
No. 02-1851-CD

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

M 10:49-84
FEB 28 2003

William A. Shaw
Prothonotary

NO
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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
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

MAR 05 2003

William A. Shaw
Prothonotary

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

DONALD NORTHROP,

Plaintiff

-vs-

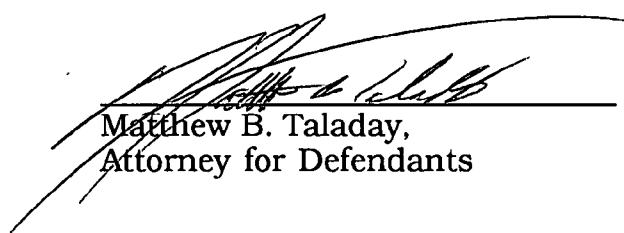
No. 02-1851-CD

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 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

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

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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 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

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

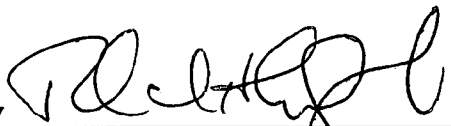
10. A conclusion of law to which no response is necessary.

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

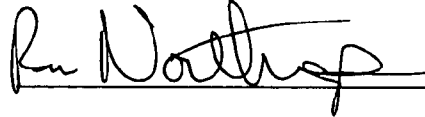
By



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

A handwritten signature in cursive script, appearing to read "Ron Northrop", is written over a horizontal line.

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

—
109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

0/3:15 PM
MAR 18 2003

William A. Shaw
Prothonotary

RICHARD H. MILGRUB

Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

1cc
Atty Milgrub
[Signature]

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

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*
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No. 02-1851-CD
JURY TRIAL DEMANDED

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-

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
*
*
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*
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*

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 P.M.

William A. Shaw
Prothonotary

no 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

-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
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

APR 14 2003

William A. Shaw
Prothonotary

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

DONALD NORTHROP,

Plaintiff

-vs-

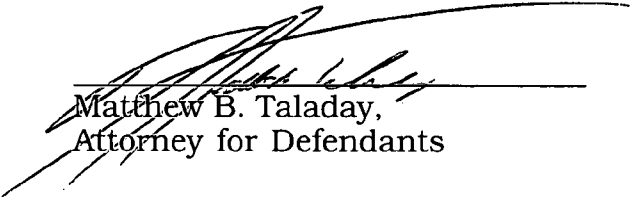
No. 02-1851-CD

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

FILED

APR 14 2003

William A. Shaw
Prothonotary

NO
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IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

FILED

JUN 05 2003

DONALD NORTHROP,

Plaintiff

William A. Shaw
Prothonotary

-vs-

No. 02-1851-CD

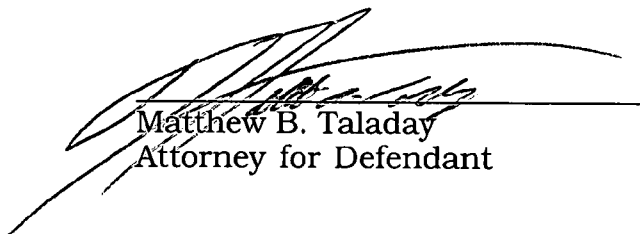
LINDA MOORE, individually,
LINDA MOORE, as agent on
behalf of LEZZER GARDEN
CENTER, LINDA MOORE,
d/b/a LEZZER GARDEN CENTER
and LEZZER GARDEN CENTER,
Defendants

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

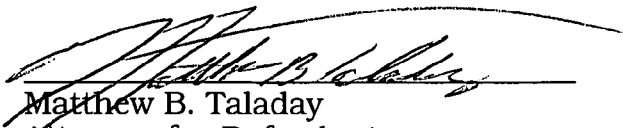
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

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 Lezzar Garden Center, Linda Moore, d/b/a Lezzar Garden Center and Lezzar 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.

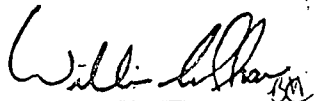
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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



Deputy

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

DATE: Tuesday, May 13, 2003
Seal of the Court

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 ()
Lezzer Garden Center and Lezzer Garden Center

Check Block if
a Minor is a
Party to the
Case

JURY DEMAND FILED BY:
Richard H. Milgrub, Esquire
Attorney for Plaintiff

DATE JURY DEMAND FILED:
11/25/02

AMOUNT AT ISSUE

CONSOLIDATION

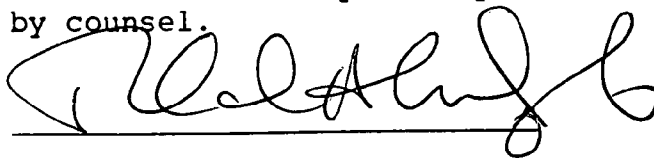
DATE CONSOLIDATION ORDERED

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

46 CC

013:10-84

JUL 07 2003

copy to C/A

William A. Shaw
Prothonotary

WAS

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-C.D.

FILED

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

AUG 15 2003

0/3.15/

William A. Shaw
Prothonotary
Attest.

AUG 15 2003

CERT TO

William A. Shaw
Prothonotary/
Clerk of Courts

ORDER

NOW, this 15th day of August, 2003, following Pre-Trial
Conference with counsel for the parties as set forth above, it
is the ORDER of this Court as follows:

1. Jury Selection will be held on August 22, 2003
commencing at 9:00 a.m. in Courtroom No. 1 of the Clearfield
County Courthouse, Clearfield, Pennsylvania.

2. Jury Trial is hereby scheduled for November 24,
2003 commencing at 9:00 a.m. in Courtroom No. 2 of the
Clearfield County Courthouse, Clearfield, Pennsylvania.

3. The Trial will be relative issues of causation
and damages only as the Defendant has admitted liability.

4. The parties have agreed to stipulate to the lien
to the Regence Life and Health Insurance Company in the amount
\$1,324.60 and the medical bill to Tony Bertini, physical

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,

A handwritten signature in cursive script, appearing to read "Fredric J. Ammerman", written over a horizontal line.

JUDGE FREDRIC J. AMMERMAN

FILED

AUG 15 2003

William A. Shaw
Prothonotary

CEM TO. 

- X 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

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-C.D.

O R D E R

NOW, this 18th 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

012:1581
AUG 18 2003

[Signature]

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

[Signature]

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

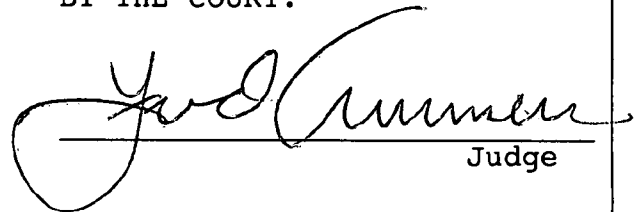
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No. 02-1851-CD
JURY TRIAL DEMANDED

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:


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}
9:05 AM
AUG 20 2003
July Milgrub

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 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

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No. 02-1851-CD
JURY TRIAL DEMANDED

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-

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

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* No. 02-1851-CD
* JURY TRIAL DEMANDED
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PETITION FOR CONTINUANCE

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

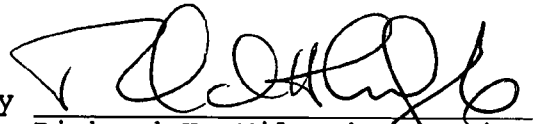
1. Jury Selection in the above-captioned case had originally be scheduled for August 29, 2003.
2. Because of the limited amount of cases on schedule for Trial, Jury Selection was consolidated and scheduled for August 22, 3003.
3. Your Petitioner's attorney, Richard H. Milgrub, Esquire, had long-standing 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

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FILED

09:05:14
AUG 20 2003

William A. Shaw
Prothonotary/Clerk of Courts

icc
Atty Milgrub
[Signature]

RICHARD H. MILGRUB

Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830