

03-103-CD
DARRON H. STRATTON, et al vs. SUSAN M. LUDWIG

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(Civil Division)

DARRON H. STRATTON and PHYLLIS :
A. STRATTON, husband and wife :
Plaintiffs :

v.

: No. 03-103-CJ

SUSAN M. LUDWIG :
Defendant :

Type of Pleading:

COMPLAINT

Type of Action:

Personal Injury

Filed on Behalf Of:

Plaintiff

Counsel for Plaintiffs

William A. Shaw, Jr.
I.D. # 78007

Attorney at Law
211 North Second Street
Clearfield, PA 16830
(814) 765-1910

FILED

JAN 24 2003

William A. Shaw
Prothonotary

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(Civile Division)

DARRON H. STRATTON and PHYLLIS :
A. STRATTON, husband and wife :
Plaintiffs :
:
v. : No.
:
SUSAN M. LUDWIG :
Defendant :
:

NOTICE TO DEFEND AND CLAIM RIGHTS

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 (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 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
230 East Market Street
Clearfield, Pennsylvania 16830
(814) 765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(Civil Division)

DARRON H. STRATTON and PHYLLIS :
A. STRATTON, husband and wife :
Plaintiffs :
:
v. : No.
:
SUSAN M.. LUDWIG :
Defendant :
:

COMPLAINT

NOW, comes the Plaintiffs, Darron H. Stratton and Phyllis A. Stratton, by and through their attorney, William A. Shaw, Jr., Esquire, and in support of the foregoing Complaint, avers as follows:

1. The Plaintiffs, Darron H. Stratton and Phyllis A. Stratton, are husband and wife, adult individuals, citizens of the Commonwealth of Pennsylvania, and residing at 900 Village Road, Clearfield, PA, 16830.
2. The Defendant, Susan M. Ludwig, is an adult individual and citizen of the Commonwealth of Pennsylvania, residing at RD1 Box 30, Grampian, PA, 16838.
3. On or about October 4, 2001, at approximately 5:42 pm, the Plaintiff, Darron H. Stratton was operating a 2001 Harley Davidson motorcycle and traveling North on SR1001.
4. On or about October 4, 2001, at approximately 5:42 pm, the Defendant was operating a 2001 Ford sedan automobile and traveling South on SR 1001.
5. As the Defendant operated her automobile South on SR 1001, the Defendant

entered into the center turning lane of traffic intending to enter the parking lot of Jack's Donuts, a business located along SR 1001, in Lawrence Township, Clearfield County.

6. As the Defendant operated her automobile South on SR 1001, the Defendant crossed into the Northbound lane of traffic, intending to enter the parking lot of Jack's Donuts.

7. Upon entering the Northbound lane of SR 1001, the Defendant negligently operated her automobile directly in front of the Plaintiff, Darron H. Stratton, causing a collision with the motorcycle operated by Mr. Stratton.

8. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton was ejected from his motorcycle, rendered unconscious, and transported to the Clearfield Hospital by ambulance.

9. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered a laceration of the left shoulder and severely comminuted fracture of the left clavicle.

10. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered a puncture wound above the skin of the left clavicle where a broken bone punctured his skin.

11. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered severe bruising about his body.

12. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered scarring and permanent disfigurement.

13. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered and continues to suffers severe pain, soreness, and restricted movement of his left clavicle and shoulder.

14. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered a closed head injury.

15. As a direct and proximate result of negligently operating her automobile into the pathway of Mr. Stratton's motorcycle, Mr. Stratton suffered and continues to suffer from post concussion syndrome, cognitive disorder, adjustment disorder, forgetfulness, lack of attention, inability to concentrate, memory loss, and chronic headaches.

COUNT I
NEGLIGENCE
DARRON H. STRATTON v. SUSAN M. LUDWIG

16. Paragraphs 1 -15 are incorporated herein by reference.

17. The forgoing accident on October 4, 2001, and all of the injuries and damages set forth herein and sustained by the Plaintiff, Darron H. Stratton, are the direct and proximate result of the negligent, careless, wanton, and reckless manner in which the Defendant, Susan M. Ludwig, operated her motor vehicle as follows:

- a. In failing to have the motor vehicle under proper and adequate control;
- b. In failing to keep a careful and diligent watch on the road;
- c. In failing to comply with the provisions of the Pennsylvania Motor Vehicle Code relating to the operation of motor vehicles, specifically as they relate to the aforesaid acts of negligence;

- d. In failing to give warning of approach or intended direction of travel;
- e. In failing to exercise regard for the existence of other motorists lawfully upon the highway;
- f. With the Plaintiff, Darron H. Stratton, in full view, the Defendant carelessly and negligently operated her motor vehicle so that it was brought into the pathway of Mr. Stratton's motorcycle and caused forcible contact with the Plaintiff, Darron H. Stratton, causing Mr. Stratton to sustain the injuries set forth above;
- g. In failing to observe the Plaintiff, Darron H. Stratton, operating his motorcycle upon the highway;
- h. In permitting or allowing her vehicle to strike and collide with the motorcycle operated by the Plaintiff, Darron H. Stratton;
- i. In failing to yield the right-of-way to on-coming traffic;
- j. In turning in such a manner as to endanger other vehicles on the highway;
- k. In failing to observe oncoming traffic;
- l. In operating her vehicle so as to create a dangerous situation for other vehicles on the highway;
- m. In failing to keep a reasonable lookout for other motorists lawfully upon the highway;
- n. Such other acts or omissions as may be revealed in the course of discovery, or at the trial of this case.

18. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has suffered physical pain, mental anguish, discomfort, inconvenience, and distress.

19. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, shall continue to suffer physical pain, mental anguish, discomfort, inconvenience, and distress.

20. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has endured and will continue to endure embarrassment and humiliation.

21. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has been grossly disfigured and suffers unbearable and unnatural noise in his left shoulder.

22. As a direct and proximate result of Defendant's negligence, the Plaintiff Darron H. Stratton, has undergone and in the future will undergo great inconvenience and decreased ability to:

- a. Fully participate in his avocations and recreational activities.
- b. Enjoy a sense of peace and well being.
- c. Enjoy peaceful sleep
- d. Enjoy social activities.

23. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has suffered loss of enjoyment of life and will continue to suffer future loss of enjoyment of life.

24. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has incurred miscellaneous expenses in an effort to restore himself to health.

25. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, believes and therefore avers that he may be required to incur similar expenses in the future in an effort to restore himself to health.

26. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has received medical treatment wherein medical expenses were paid under applicable insurance programs, and a subrogation lien is in effect.

27. As a direct and proximate result of Defendant's negligence, the Plaintiff, Darron H. Stratton, has incurred medical expenses for which he is liable and may incur additional expenses in the future.

WHEREFORE, the Plaintiff, Darron H. Stratton, demands judgment against the Defendant, Susan M. Ludwig, in an amount in excess of \$20,000.00, exclusive of interest and costs and in excess of any jurisdictional amount requiring compulsory arbitration.

JURY TRIAL DEMANDED

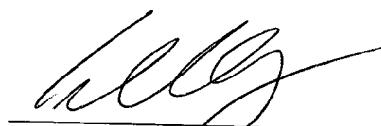
COUNT II
LOSS OF CONSORTIUM
PHYLLIS A. STRATTON v. SUSAN M. LUDWIG

28. Paragraphs 1 - 27 are incorporated herein by reference.
29. As a direct and proximate result of Defendant's negligence, the Plaintiff, Phyllis A. Stratton, has been and shall in the future be deprived of the care, companionship, and consortium of her husband, the Plaintiff, Darron H. Stratton.

WHEREFORE, the Plaintiff Phyllis A. Stratton demands judgment against the Defendant, Susan M. Ludwig, in an amount in excess of \$20,000.00, exclusive of interest and costs and in excess of any jurisdictional amount requiring compulsory arbitration.

JURY TRIAL DEMANDED

Respectfully Submitted,

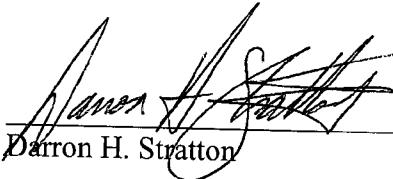


William A. Shaw, Jr.
For Plaintiffs

VERIFICATION

We, Darron H. Stratton and Phyllis A. Stratton, verify that the statements made herein are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Date: 1/123/03


Darron H. Stratton

Date: 01/123/03


Phyllis A. Stratton

11cc
Atty Shaw
Atty pd \$85.00

X O/3: closed
JUL 24 1983
William A. Shaw
Prothonotary

WILLIAM A. SHAW, JR.
ATTORNEY AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

SUSAN M. LUDWIG,
Defendant

Type of Case: Civil Action
No. 03-103-CD
Type of Pleading:
Praecipe for
Entry of Appearance
Filed on Behalf of:
Defendant
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 05 2003

William A. Shaw
Prothonotary

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

No. 03-103-CD

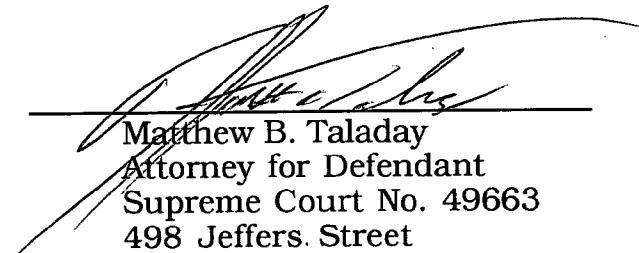
SUSAN M. LUDWIG,
Defendant

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance for the Defendant, Susan M. Ludwig, in the above captioned matter.

Dated: 2-4-03


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

cc: William A. Shaw, Esq.
211 North Second Street
Clearfield, PA 16830

FILED
NOV 10 1988 PM
FBI BOSTON
WES
William A. Shaw
Prothonotary

U.S. DISTRICT COURT

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

SUSAN M. LUDWIG,
Defendant

Type of Case: Civil Action

No. 03-103-CD

Type of Pleading:

Answer and
New Matter

Filed on Behalf of:

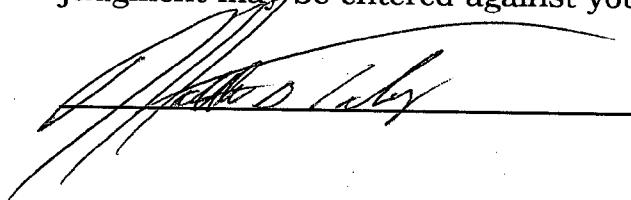
Defendant

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 14 2003

William A. Shaw
Prothonotary

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,

Plaintiffs

-vs-

No. 03-103-CD

SUSAN M. LUDWIG,

Defendant

ANSWER

AND NOW, comes the Defendant, Susan M. Ludwig, by her attorneys, Hanak, Guido and Taladay, and hereby responds to Plaintiffs' Complaint as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied as stated. However, Defendant admits liability for the collision.

8. - 15. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of the averments of paragraphs 8 through 15 of Plaintiffs' Complaint,

therefore they are denied and strict proof thereof is demanded at the time of trial.

**COUNT I
NEGLIGENCE
DARRON H. STRATTON vs. SUSAN M. LUDWIG**

16. Paragraphs 1 through 15 of the Answer are incorporated herein by reference as though fully set forth in length.

17. Defendant denies all allegations of wanton and reckless conduct. The remaining allegations of paragraph 17 are denied as stated, however, Defendant accepts liability for the collision.

18. - 27. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of the averments of paragraphs 18 through 27 of Plaintiffs' Complaint, therefore they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendant demands judgment in her favor.

**COUNT II
LOSS OF CONSORTIUM
PHYLLIS A. STRATTON vs. SUSAN M. LUDWIG**

28. Paragraphs 1 through 27 of the Answer are incorporated herein by reference as though fully set forth in length.

29. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of the averments of paragraph 29 of Plaintiffs' Complaint, therefore they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendant demands judgment in her favor.

NEW MATTER

30. The claims of the Plaintiffs are barred or limited by the applications of the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law.

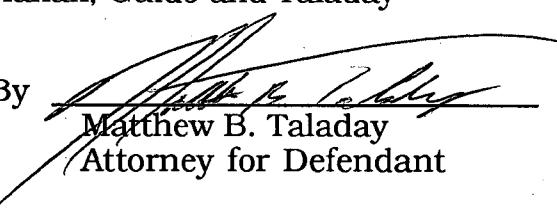
31. Plaintiffs' claims are barred or limited by the application of the Doctrine of Comparative Negligence in that the Defendant was operating his motorcycle at a speed greater than that which was reasonable and prudent under the circumstances then and there prevailing and in excess of the posted speed limit.

WHEREFORE, Defendant demands judgment in her favor.

Respectfully submitted,

Hanak, Guido and Taladay

By


Matthew B. Taladay
Attorney for Defendant

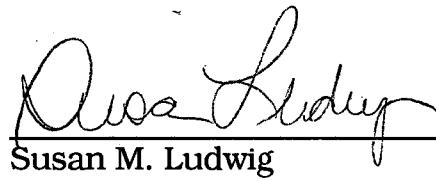
VERIFICATION

I, **Susan M. Ludwig**, 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:

2/9/03


Susan M. Ludwig

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,

Plaintiffs

-vs-

No. 03-103-CD

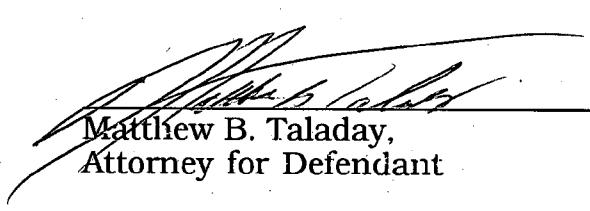
SUSAN M. LUDWIG,

Defendant

CERTIFICATE OF SERVICE

I certify that on the 12th day of February, 2003, a true and correct copy of Defendant's Answer and New Matter was sent via first class mail, postage prepaid, to the following:

William A. Shaw, Esq.
Attorney for Plaintiffs
211 North Second Street
Clearfield, PA 16830


Matthew B. Taladay,
Attorney for Defendant

FILED NO
CC
M 1111
FEB 14 2003
FEB

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

SUSAN M. LUDWIG,
Defendant

Type of Case: Civil Action
No. 03-103-CD

Type of Pleading:

Notice of
Service

Filed on Behalf of:

Defendant

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 19 2003

William A. Shaw
Prothonotary

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,

Plaintiffs

-vs-

No. 03-103-CD

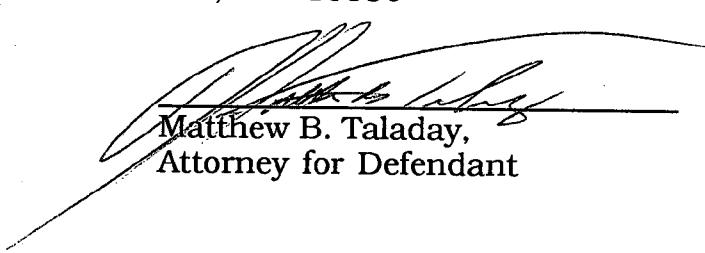
SUSAN M. LUDWIG,

Defendant

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
17th day of February, 2003, Defendant's FIRST SET OF DISCOVERY
MATERIALS to the below indicated person, at said address, being
counsel of record for the Plaintiffs:

William A. Shaw, Esq.
Attorney for Plaintiffs
211 North Second Street
Clearfield, PA 16830


Matthew B. Taladay,
Attorney for Defendant

FILED

10:37 AM
FEB 19 2003
cc
WAS
GAS

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

SUSAN M. LUDWIG,
Defendant

Type of Case: Civil Action

No. 03-103-CD

Type of Pleading:

Certificate
of Service

Filed on Behalf of:

Defendant

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

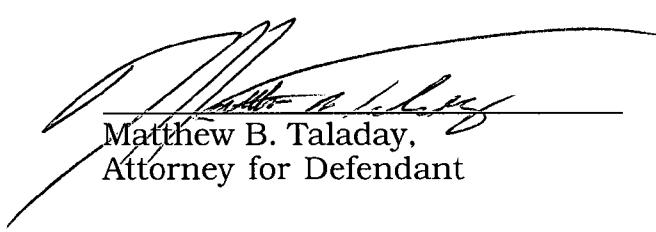
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

DARRON H. STRATTON and	:	
PHYLLIS A. STRATTON,	:	
husband and wife,	:	
Plaintiffs	:	
-vs-		No. 03-103-CD
SUSAN M. LUDWIG,	:	
Defendant	:	

CERTIFICATE OF SERVICE

I certify that on the 11th day of April, 2003, an original Notice of Deposition, copy of which is attached hereto, was sent via first class mail, postage prepaid, to the following:

William A. Shaw, Jr., Esq.
Attorney for Plaintiffs
211 N. Second Street
Clearfield, PA 16830


Matthew B. Taladay,
Attorney for Defendant

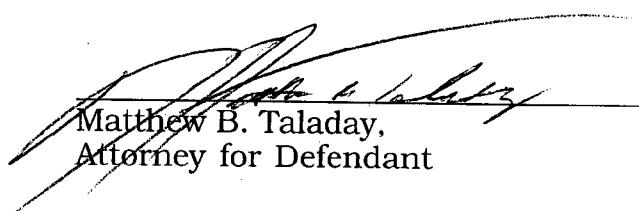
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

DARRON H. STRATTON and :
PHYLLIS A. STRATTON, :
husband and wife, :
Plaintiffs :
: :
-vs- : No. 03-103-CD
: :
SUSAN M. LUDWIG, :
Defendant :
:

NOTICE OF DEPOSITION

TO: DARRON H. STRATTON
c/o William A. Shaw, Jr., Esq.

TAKE NOTICE that your deposition by oral examination
will be taken on **Friday, April 25, 2003 at 1:30 p.m.** at the law office of
William A. Shaw, Jr., 211 N. 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

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,

Plaintiffs

-vs-

No. 03-103-CD

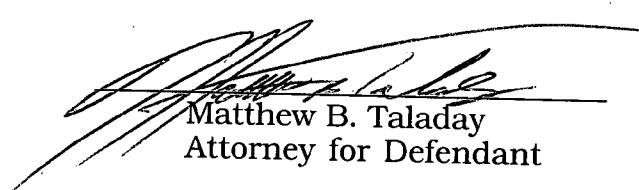
SUSAN M. LUDWIG,
Defendant

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: 08/18/03


Matthew B. Taladay
Attorney for Defendant

FILED

AUG 19 2003

William A. Shaw
Prothonotary/Clerk of Courts

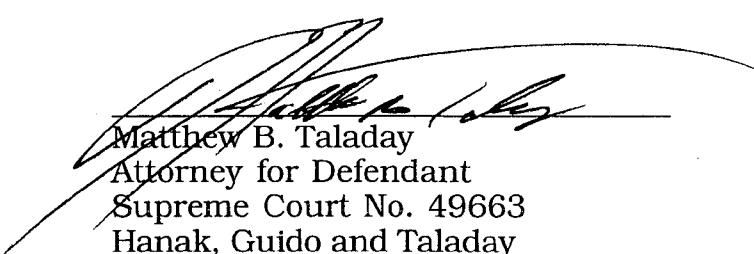
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

DARRON H. STRATTON and :
PHYLLIS A. STRATTON, :
husband and wife, :
Plaintiffs :
: :
-vs- : No. 03-103-CD
: :
SUSAN M. LUDWIG, :
Defendant :
:

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

Defendant, Susan M. Ludwig, 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: 07/22/03


Matthew B. Taladay
Attorney for Defendant
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

Darron H. Stratton

*

Phyllis A. Stratton

Plaintiff(s)

Vs.

*

No. 2003-00103-CD

Susan M. Ludwig

*

Defendant(s)

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

TO: Pennsylvania State Police, c/o Colonel Jeffrey B. Miller
(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:

Photocopy of complete medical file of Darron H. Stratton.

P.O. Box 487, DuBois, PA 15801
(Address)

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: Friday, July 18, 2003

Seal of the Court

J. Kendrick
Deputy

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,
Plaintiffs

-vs-

SUSAN M. LUDWIG,
Defendant

Type of Case: Civil Action

No. 03-103-CD

Type of Pleading:

Praecipe for
Discontinuance

Filed on Behalf of:

Plaintiffs

Counsel of Record for This
Party:

William A. Shaw, Jr., Esq.
Supreme Court No. 78007
211 North Second Street
Clearfield, PA 16830

(814) 765-1910

FILED

FEB 17 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

DARRON H. STRATTON and
PHYLLIS A. STRATTON,
husband and wife,

Plaintiffs

-vs-

No. 03-103-CD

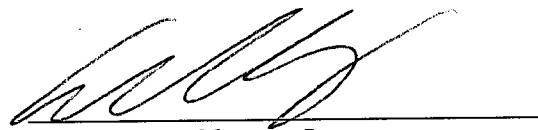
SUSAN M. LUDWIG,

Defendant

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Please mark the above referenced matter settled and
discontinued.



William A. Shaw, Jr.
Attorney for Plaintiffs

FILED

cc & disc to
01/9/31/2004 Atty Shaw
FEB 17 2004
2004

William A. Shaw
Prothonotary/Clerk of Courts

COPY to CIA

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Darron H. Stratton
Phyllis A. Stratton

Vs.
Susan M. Ludwig

No. 2003-00103-CD

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on February 17, 2004, marked:

Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by William A. Shaw, Jr., Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 17th day of February A.D. 2004.

William A. Shaw, Prothonotary