

03-443-CD
DELORES W. GINTER VS. BRENDA A. LINK

Date: 12/23/2003

Clearfield County Court of Common Pleas

User: BANDERSON

Time: 11:06 AM

ROA Report

Page 1 of 1

Case: 2003-00443-CD

Current Judge: Paul E. Cherry

Delores W. Ginter vs. Brenda A. Link

Civil Other

| Date | | Judge |
|------------|---|------------|
| 03/27/2003 | Filing: Praeipce for Writ of Summons Paid by: Colavecchi, Joseph (attorney for Ginter, Delores W.) Receipt number: 1857710 Dated: 03/27/2003 Amount: \$85.00 (Check) 2 CC & 2 Writs to Atty. Colavecchi. | No Judge ✓ |
| 04/21/2003 | Filing: Civil Complaint Paid by: Joseph Colavecchi Receipt number: 1858887 Dated: 04/21/2003 Amount: \$85.00 (Check) 2 CC to Atty. | No Judge ✓ |
| 06/03/2003 | Praeipce for Entry of Appearance for Defendant by James M. Horne, Esq. Certificate of Service of Entry of Appearance. No cc. | No Judge ✓ |
| 06/09/2003 | Sheriff Return, Papers served on Defendant(s). So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm | No Judge ✓ |
| 06/17/2003 | Answer With New Matter. filed by s/James M. Horne, Esquire Verification s/Brenda A. Link Certificate of Service no cc | No Judge ✓ |
| 06/19/2003 | Reply To New Matter. filed by s/Joseph Colavecchi, Esquire no cc | No Judge ✓ |
| 06/25/2003 | Certificate of Service, Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things upon: Joseph Colavecchi, Esquire. Filed by s/James M. Horne, Esq. no cc | No Judge ✓ |
| | Certificate of Service, Defendant's First Set of Interrogatories and Request for Production of Documents and Defendant's Request For Production of Documents and Tangible Things Directed to Plaintiff (Set Two) upon: Joseph Colavecchi, Esquire filed by s/James M. Horne, Esq. no cc | No Judge ✓ |
| 07/02/2003 | Certificate Prerequisite To Service Of Subpoenas Pursuant To Rule 4009.22. filed by s/James M. Horne, Esquire no cc | No Judge ✓ |
| 08/08/2003 | Certificate of Service of Defendant's Notice of Taking Deposition of Plaintiff filed by Atty. Horne. | No Judge ✓ |
| 09/23/2003 | Certificate of Service, Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things upon: JOSEPH COLAVECCHI, ESQ. filed by s/James M. Horne, Esquire no cc | No Judge ✓ |
| 09/26/2003 | Certificate Prerequisite to Service of Subpoenas and Certificate of Service. Filed by s/James M. Horne, Esquire no cc | No Judge ✓ |
| 10/22/2003 | Certificate of Readiness, filed by s/James M. Horne, Esq. Jury Trial requested. No CC copy to CA | No Judge ✓ |
| 10/31/2003 | Certificate of Service of Defendant's Notice of Intent to Serve Subpoena filed by Atty. Horne. No cc. | No Judge ✓ |
| 11/05/2003 | Certificate Prerequisite to Service of Subpoena filed by Atty. Horne. No cc. | No Judge ✓ |
| | Praeipce for Appearance on behalf of Plaintiff as co-counsel with Joseph Colavecchi filed by Atty. Sughrue. 1 CC to Atty. | No Judge ✓ |
| 11/21/2003 | Praeipce To Discontinue, End and Settle. filed by, s/Joseph Colavecchi, Esquire no cc | No Judge ✓ |
| | SETTLED, DISCONTINUED AND ENDED | No Judge |

*** TRANSMISSION REPORT ***

Dec.22 '03 15:49

| DATE | START | TIME | PARTNER | MODE | PAGE | RESULT |
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*** ACTIVITY REPORT ***

Dec.23 '03 1:28

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DELORES W. GINTER,
Plaintiff
Vs.

BRENDA A. LINK,
Defendant

CIVIL DIVISION

No. 03 - 443 - CD

PRAECIPE FOR WRIT OF SUMMONS

Filed on Behalf of:

Plaintiff, DELORES W. GINTER

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED

MAR 27 2003

William A. Shaw
Prothonotary

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

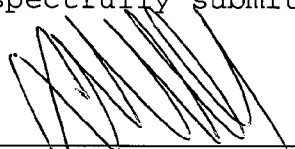
DELORES W. GINTER, :
Plaintiff : No. 03 - - CD
Vs. :
BRENDA A. LINK, :
Defendant :

PRAECIPE FOR WRIT OF SUMMONS

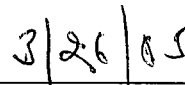
TO: WILLIAM SHAW, PROTHONOTARY

Please issue a Writ of Summons directed to Brenda A. Link
residing at 292 Harmony Drive, Flinton, Pennsylvania 16640.

Respectfully submitted,



JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
814/765-1566



Date

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 03 - - CD

DELORES GINTER,
Plaintiff

vs.

BRENDA A. LINK,
Defendant

PRAECIPE FOR WRIT OF
SUMMONS

FILED

9/3:03 PM
MAR 27 2003

William A. Shaw
Prothonotary

2 cc & 2013
to Atty Colavecchi
Atty pd. 85.00

COLAVECCHI
RYAN & COLAVECCHI
ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DELORES W. GINTER,
Plaintiff

Vs.

BRENDA A. LINK,
Defendant

CIVIL DIVISION

No. 03 - 443 - CD

COMPLAINT

Filed on Behalf of:

Plaintiff, DELORES W. GINTER

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

FILED

APR 21 2003

William A. Shaw
Prothonotary

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

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

DELORES W. GINTER,

Plaintiff : No. 03 - 443 - CD

Vs.

BRENDA A. LINK,

Defendant :

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.

LAW OFFICES OF
COLAVECCHI
RYAN & COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

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

DELORES W. GINTER, :
Plaintiff : No. 03 - 443 - CD
Vs. : JURY TRIAL DEMANDED
BRENDA A. LINK, :
Defendant :

COMPLAINT

1. Plaintiff is Delores W. Ginter an individual with a mailing address of P.O. Box 337, Coalport, Pennsylvania 16627.

2. Defendant is Brenda A. Link an individual residing at 292 Harmony Drive, Flinton, Pennsylvania 16640.

3. On August 4, 2001, Plaintiff was operating a motor vehicle in a northerly direction on SR 0053 in Coalport Borough, Clearfield County, Pennsylvania, at approximately 2:07 p.m.

4. On that same day, time and place, Defendant was operating a motor vehicle traveling south on SR 0053 in Coalport Borough, Clearfield County, Pennsylvania.

5. Defendant lost control of her vehicle and traveled across the double yellow lines and smashed into the vehicle being operated by Plaintiff.

6. Defendant's vehicle came to rest against the curb in the southbound lane of SR 0053 approximately 40 feet north of the point of the collision.

7. Plaintiff's vehicle came to rest in the southbound lane of SR 0053 facing in a southeasterly direction approximately 15 feet south of the point of collision.

8. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant in any or all of the following respects:

a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;

b. In failing to have the vehicle under proper control;

c. In continuing to operate the vehicle in a direction toward Plaintiff's vehicle when its operator saw or in the exercise of reasonable diligence, should have seen that further operation in that direction would result in a collision;

d. In that the driver was inattentive and failed to maintain a sharp lookout of the road and the surrounding traffic conditions;

e. In driving on the wrong side of the highway;

f. In crossing the divider lines which mark the center of the road;

g. In failing to maintain a reasonable look out for the presence of other motor vehicles on the road; and,

h. In failing to avoid hitting Plaintiff's vehicle when the Defendant saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant.

9. Solely as a result of the negligence of the Defendant, Plaintiff sustained various injuries to her bones, muscles, tissues and ligaments, possible internal injuries, shock and injury to the nerves and nervous system.

10. As a result of the injuries as aforesaid, Plaintiff has sustained the following damages:


a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for surgical and medical attention, hospitalization, medical supplies, medicines and attendant services; and,

c. Said Plaintiff's general health, strength and vitality have been impaired.

11. As a further result of the negligence of the Defendant as aforesaid, the said automobile of Plaintiff was damaged and Plaintiff has been obliged to have said motor vehicle repaired and was deprived of its use for some time and said motor vehicle has depreciated in value.

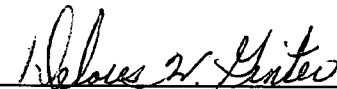
WHEREFORE, Plaintiff brings this action against Defendant to recovery damages in excess of the jurisdiction of the Board of Arbitrators of this Court and in excess of Twenty Thousand Dollars (\$20,000.00).



JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I verify that the statements made in this Complaint 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.



DELORES W. GINTER

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 03 - 433 - CD

DELORES W. GINTER,
Plaintiff

vs.

BRENDA A. LINK,
Defendant

COMPLAINT

NOTICE TO DEFENDANT:

YOU are hereby notified
that you are required to file
an Answer to the within Complaint
within twenty (20) days after
service upon you or judgment
may be entered against you.

Joseph Colavecchi
JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

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FILED

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2008 APR 21 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **PRAECIPE FOR ENTRY**
: **OF APPEARANCE**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

JUN 03 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

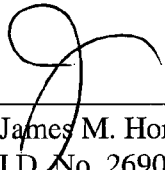
Please enter our appearance on behalf of the Defendant, BRENDA A. LINK, in the
above-captioned matter.

We are authorized to accept service on her behalf.

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

Dated: June 2, 2003

By: _____


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

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of our Praecipe for Entry of Appearance on behalf the Defendant, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 2nd day of June, 2003, to the attorney of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
(814) 765-1566

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

By: _____

James M. Horne, Esquire

I. D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

FILED

M 10:32 AM

JUN 03 2003

pd. 25 for copy of docket -

William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

GINTER, DELORES W.

VS.

LINK, BRENDA A.

COMPLAINT

Sheriff Docket #

13981

03-443-CD

SHERIFF RETURNS

NOW APRIL 24, 2003 BOB KOLAR, SHERIFF OF CAMBRIA COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON BRENDA A. LINK, DEFENDANT.

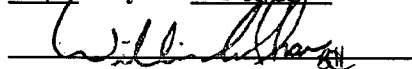
NOW MAY 21, 2003 SERVED THE WITHIN COMPLAINT ON BRENDA A. LINK, DEFENDANT BY DEPUTIZING THE SHERIFF OF CAMBRIA COUNTY. THE RETURN OF SHERIFF KOLAR IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.

Return Costs

| Cost | Description |
|-------|--|
| 27.97 | SHERIFF HAWKINS PAID BY: ATTY Ck# 6913 |
| 10.00 | SURCHARGE PAID BY: ATTY Ck# 6914 |
| 64.20 | CAMBRIA CO. SHFF PAID BY: ATTY. |

Sworn to Before Me This

9th Day Of July 2003



WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

So Answers,


Chester A. Hawkins

Sheriff

FILED

019:16:001
JUN 09 2003

William A. Shaw
Prothonotary

CASE # PLAINTIFF
90128-03 GINTER, DELORES 03-443
DATE 5/21/03

DEFENDANT
LINK, BRENDA

AT 13:30 HRS. SERVED THE COMPLAINT WITH NOTICE TO DEFEND
UPON BRENDA A. LINK BY HANDING A TRUE AND ATTESTED COPY
THEREOF TO HER PERSONALLY AT 292 HARMONY DR. FLINTON, PA.
AND MAKING CONTENTS THEREOF KNOWN TO HER. MY COSTS PAID BY
ATTORNEY FOR PLAINTIFF.

SHERIFF COSTS 61.20
PROTHONATARY 3.00
TOTAL COSTS 64.20

SO ANSWERS,

Bob Kolar

BOB KOLAR, SHERIFF

SWORN AND SUBSCRIBED TO BEFORE ME THIS 22ND DAY OF MAY, 03.
.PROTHONOTARY *Patty Berkebile*

SECRET

STATEMENT

| | |
|---------------------|--------|
| TOTAL COSTS..... | 100.00 |
| TOTAL RECEIPTS..... | 100.00 |

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **ANSWER WITH NEW**
: **MATTER**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

JUN 17 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

:
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No. 03-443-C.D.

NOTICE TO PLEAD

TO: Delores W. Ginter
% Joseph Colavecchi, Esquire

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

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

Dated: June 16, 2003

By: 

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

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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:

No. 03-443-C.D.

DEFENDANT'S ANSWER WITH NEW MATTER

1. Upon information and belief, the allegations of paragraph 1 are admitted.

2. Admitted.

3. Admitted, except the allegation that Plaintiff was traveling northbound. To the contrary, Plaintiff as traveling southbound.

4. Admitted, except the allegation that Defendant was traveling southbound. To the contrary, Defendant was traveling northbound.

5. It is admitted only that contact occurred between the two vehicles at or about the date, time and place alleged. The balance of the allegations of paragraph 5 are denied.

6. – 7. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments of paragraphs 6 and 7. The same are therefore denied and strict proof thereof demanded.

8(a) – (h). Denied, pursuant to Pa.P.C.P. 1029(e).

9. – 11. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments of paragraphs 9 through 11, inclusive.

The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant requests that Plaintiff's Complaint be dismissed, with prejudice and costs of suit.

NEW MATTER

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

13. To the extent Plaintiff incurred medical expenses and the same were paid or are payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

14. To the extent Plaintiff was insured under a policy of insurance bearing the limited tort option, Plaintiff's claims are barred or reduced accordingly.

WHEREFORE, Defendant requests that Plaintiff's Complaint be dismissed, with prejudice and costs of suit.

Respectfully submitted,

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

Dated: June 16, 2003

By: 

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

VERIFICATION

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



BRENDA A. LINK

Dated: 6-13, 2003

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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:

No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answer with New Matter, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 16th day of June, 2003, to the attorney of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
(814) 765-1566

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

By: _____


James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

FILED

3111461
JUN 17 2003

William A. Shaw
Prothonotary



no
cc

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DELORES W. GINTER,

Plaintiff

Vs.

BRENDA A. LINK,

Defendant

CIVIL DIVISION

No. 03 - 443 - CD

REPLY TO NEW MATTER

Filed on Behalf of:

Plaintiff, DELORES W. GINTER

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

FILED

JUN 19 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff : No. 03 - 443 - CD

Vs.

BRENDA A. LINK,

Defendant :

REPLY TO NEW MATTER

NOW COMES, Delores W. Ginter, who, through her attorney, Joseph Colavecchi, Esquire, files her Reply to the New Matter of the Defendant and respectfully avers as follows:

12. This is a statement of the law and does not require a reply.

13. This is a statement of the law and does not require a reply.

14. This is a statement of the law and does not require a reply.

WHEREFORE, Plaintiff asks that the Answer and New Matter of the Defendant be dismissed and that judgment be entered in favor of Plaintiff, together with interest and costs.

Respectfully submitted,


JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
CIVIL DIVISION
No. 03 - 443 - CD

DELORES W. GINTER,
Plaintiff

vs.

BRENDA A. LINK,
Defendant

REPLY TO NEW MATTER

FILED

0 2:54 PM 10/24
JUN 19 2003 *EL*

William A. Shaw
Prothonotary

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

JUN 25 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 24th day of June, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: 

James M. Horne, Esquire
I.D. No. 26908

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

Attorneys for Defendant

FILED

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JUN 25 2003 *ED*

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

JUN 25 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's First Set of Interrogatories and Request for Production of Documents, and Defendant's Request For Production of Documents and Tangible Things Directed to Plaintiff (Set Two) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 24th day of June, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____


James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

FILED

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JUN 25 2003



William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **Certificate Prerequisite to Service**
: **of Subpoenas**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

JUL 02 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

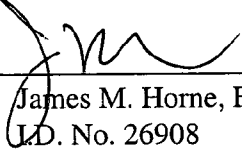
As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) Plaintiff's counsel, by letter dated June 25, 2003, has waived the 20-day objection period,
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: June 30, 2003

By: _____


James M. Horne, Esquire
I.D. No. 26908

Attorney for Defendant
811 University Drive
State College, PA 16801-6699
(814) 238-4926

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

No. 03-443-C.D.

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

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

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

Date: June 24, 2003

By: 

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801-6699

(814) 238-4926

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Michael-Gerard Moncman, D.O., MSc, FACOS*
Central PA Neurosurgical Associates, Ltd.
1701 12th Avenue, Suite F
Altoona, PA 16602

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Blair Orthopedic Associates & Sports Medicine*
P.O. Box 30
Altoona, PA 16603-0030

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

TO: *PennCare P.T.*
P.O. Box 207
Coalport, PA 16627

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

No. 03-443-C.D.

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

TO: *Altoona Hospital*
620 Howard Avenue
Altoona, PA 16601

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Johannes Schokker, M.D.*
Lexington Surgical Assoc., Inc.
Intowne Square
1701 12th Avenue
Altoona, PA 16601

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

No. 03-443-C.D.

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

TO: *Mainline Medical Assoc.*
Gregory Sweeney, M.D.
501 Howard Avenue, Suite A107
Altoona, PA 16601

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

TO: *Glendale Medical Center*
P.O. Box 375
Main Street
Coalport, PA 16627

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

TO: *Blair Medical Associates*
1414 Eighth Avenue
Altoona, PA 16602-2496

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

TO: *Altoona Pain Management*
620 Howard Avenue
Altoona, PA 16601

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

TO:

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

BY THE COURT: —

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

Dated: _____

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

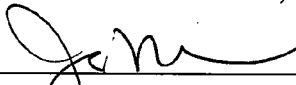
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoenas in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 16th day of July, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____


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

Attorneys for Defendant

FILED

NO
CC
JUL 15 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

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: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

AUG 08 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Taking Deposition of Plaintiff, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 1th day of August, 2003, to the attorney of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
(814) 765-1566

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

By: _____

James M. Horne, Esquire

I. D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

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: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

SEP 23 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

:
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:

No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 22 day of September, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:

: TYPE OF PLEADING:
: **Certificate Prerequisite to Service of**
: **Subpoenas and Certificate of Service**

:

:

: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

:

:

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

FILED
SEP 26 2003
William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

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

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) by correspondence dated September 23, 2003, Plaintiff's counsel has waived the 20-day objection period,
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: September 23, 2003

By: 

James M. Horne, Esquire

I.D. No. 26908

Attorney for Defendant

811 University Drive

State College, PA 16801-6699

(814) 238-4926

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

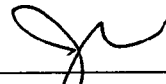
Defendant intends to serve subpoenas identical to those attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

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

Date: _____

9/22/03

By: _____



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

Attorneys for Defendant



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Alan J. Kivitz, M.D.*
1125 Old Route 220N
Duncansville, PA 16635

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Leyo's Pharmacy*
North Main Street
P.O. Box 397
Coalport, PA 16627

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all pharmacy records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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:

No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoenas in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 25th day of September, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF READINESS**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

OCT 22 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF READINESS**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

OCT 22 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE OF READINESS

The undersigned hereby certifies:

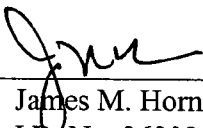
1. This matter has been at issue more than twenty (20) days.
2. All pre-trial discovery is completed.
3. There are no pending pre-trial motions.
4. This case is not subject to compulsory arbitration or has been appealed therefrom.
5. This matter is to be heard by a jury.

Respectfully submitted,

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

Dated: October 21, 2003

By: _____


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

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

No. 03-443-C.D.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate of Readiness, in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 21st day of October, 2003, to the attorney of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
(814) 765-1566

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

By: _____

James M. Horne, Esquire

I. D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

FILED No cc

10/11/18 ~~8/8/18~~ copy to CIA

OCT 22 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **CERTIFICATE OF SERVICE**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

OCT 31 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.


CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 21 day of October, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____


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

Attorneys for Defendant

FILED
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OCT 31 2003
William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

: No. 03-443-C.D.

:
: TYPE OF PLEADING:
: **Certificate Prerequisite to Service**
: **of Subpoena**

:
: TYPE OF CASE: CIVIL
: FILED ON BEHALF OF:
: **DEFENDANT**

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

FILED

NOV 05 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

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

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, is attached to this certificate,
- 3) by correspondence dated October 31, 2003, Plaintiff's counsel has waived the 20-day objection period,
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

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

Date: November 4, 2003

By: 

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

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

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

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

Date: October 29, 2003

By: _____

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

Attorneys for Defendant

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

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

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

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

Date: October 29, 2003

By: _____

James M. Horne, Esquire

I.D. No. 26908

Katherine V. Oliver, Esquire

I.D. No. 77069

811 University Drive

State College, PA 16801-6699

(814) 238-4926

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

COPY

DELORES W. GINTER, :
Plaintiff, : No. 03-443-C.D.
v. :
BRENDA A. LINK, :
Defendant. :

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

TO: *Philipsburg Hospital*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of any and all medical records in your possession pertaining to Delores W. Ginter, SS#174-28-2216; Date of Birth: 12/22/33.*

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

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

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

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

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

BY THE COURT:

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

Dated: _____

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

DELORES W. GINTER,

Plaintiff,

v.

BRENDA A. LINK,

Defendant.

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No. 03-443-C.D.

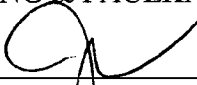
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoena for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 4th day of November, 2003, to the attorneys/parties of record:

Joseph Colavecchi, Esquire
Colavecchi, Ryan Colavecchi
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

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

By: _____


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

Attorneys for Defendant

FILED
NOV 11 01 2003
NO 22

William A. Shaw
Prothonotary/Clerk of Courts

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

DELORES W. GINTER,

Plaintiff

vs.

BRENDA A. LINK,

Defendant

No. 03- 443 -C.D.

Type of Case: CIVIL

Type of Pleading: PRAECIPE FOR
APPEARANCE

Filed on Behalf of: PLAINTIFF

Counsel of Record for this Party:

John Sughrue, Esquire
Attorney I. D. No. 01037
23 North Second Street
Clearfield, PA 16830
Phone: (814) 765-1704
Fax: (814) 765-6959

Joseph Colavecchi, Esq.
Attorney I.D. No.
221 E. Market St.
PO Box 313
Clearfield, PA 16830
Phone: (814) 765-1566
Fax: (814) 7654870

Other Counsel of Record:

James M. Horne, Esq.
ID No. 26908; and
Katherine V. Oliver, Esq.
ID No. 77069
McQuaide, Blasko, Schwartz,
Flemming & Faulkner, Inc.
811 University Drive
State College, PA 16801
Phone: (814) 238-4926
Fax: (814) 238-9624

FILED

NOV 05 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff

vs.

BRENDA A. LINK,

Defendant

No. 03- 443 -C.D.

Type of Case: CIVIL

Type of Pleading: PRAECIPE FOR
APPEARANCE

Filed on Behalf of: PLAINTIFF

Counsel of Record for this Party:

John Sughrue, Esquire
Attorney I. D. No. 01037
23 North Second Street
Clearfield, PA 16830
Phone: (814) 765-1704
Fax: (814) 765-6959

Joseph Colavecchi, Esq.
Attorney I.D. No.
221 E. Market St.
PO Box 313
Clearfield, PA 16830
Phone: (814) 765-1566
Fax: (814) 7654870

Other Counsel of Record:

James M. Horne, Esq.
ID No. 26908; and
Katherine V. Oliver, Esq.
ID No. 77069
McQuaide, Blasko, Schwartz,
Flemming & Faulkner, Inc.
811 University Drive
State College, PA 16801
Phone: (814) 238-4926
Fax: (814) 238-9624

FILED

NOV 05 2003

William A. Shaw
Prothonotary

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

DELORES W. GINTER,

Plaintiff

vs.

BRENDA A. LINK,

Defendant

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No. 03- 443 -C.D.

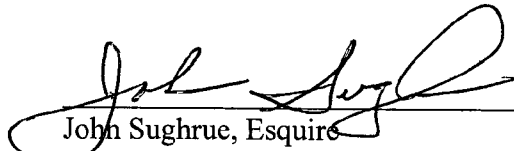
PRAECIPE FOR APPEARANCE

TO WILLIAM A. SHAW, PROTHONOTARY.

Kindly enter my appearance on behalf of DELORES W. GINTER, Plaintiff, as co-counsel
with Joseph Colavecchi, whose appearance was previously entered in the above-captioned matter.

Direct all pleadings and matters concerning the foregoing to the undersigned.

Date: November 5, 2003



John Sughrue, Esquire
Attorney for Plaintiff
Attorney I. D. #01037
23 North Second Street
Clearfield, PA 16830
Phone: (814) 765-1704
Fax: (814) 765-6959

cc: Joseph Colavecchi, Esq.
James M. Horne, Esq.
Katherine V. Oliver, Esq.

CERTIFICATE OF SERVICE

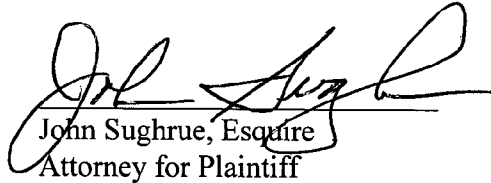
AND NOW, I do hereby certify that on November 5, 2003, I caused a true and correct copy of PRAECIPE FOR APPEARANCE to be served on the following and in the manner indicated below:

By United States Mail, First Class, Postage Prepaid
Addressed as Follows:

Mr. James M. Horne, Esq.
Ms. Katherine V. Oliver, Esq.
McQuaide, Blasko, Schwartz,
Flemming & Faulkner, Inc.
811 University Drive
State College, PA 16801

Joseph Colavecchi, Esq.
COLAVECCHI & COLAVECCHI
PO Box 131
Clearfield, PA 16830

Date: November 5, 2003


John Sughrue, Esquire
Attorney for Plaintiff

FILED

NOV 17 3 17 PM '03

NOV 17 2003

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DELORES W. GINTER,

Plaintiff

Vs.

BRENDA A. LINK,

Defendant

CIVIL DIVISION

No. 03 - 443 - CD

PRAECIPE TO DISCONTINUE

Filed on Behalf of:

Plaintiff, DELORES W. GINTER

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI RYAN & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED

NOV 21 2003

William A. Shaw
Prothonotary

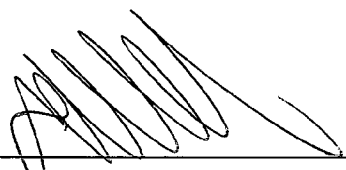
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DELORES W. GINTER, :
Plaintiff : No. 03 - 443 - CD
Vs. :
BRENDA A. LINK, :
Defendant :

PRAECIPE TO DISCONTINUE

TO: WILLIAM SHAW, PROTHONOTARY

Please mark the record in the above-captioned action
discontinued, ended and settled.



JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

November 21, 2003

DATE

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

CIVIL DIVISION

Delores W. Ginter

Vs.

No. 2003-00443-CD

Brenda A. Link

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 21, 2003, marked:

Discontinued, Ended and Settled

Record costs in the sum of \$187.17 have been paid in full by Atty. Colavecchi.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 19th day of December A.D. 2003.

William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION
No. 03 - 443 - CD

DELORES W. GINTER,
PLAINTIFF

vs.

BRENDA A. LINK,
DEFENDANT

PRAECIPE TO DISCONTINUE

FILED

NOV 21 2003

0/3:19 P.M.

William A. Shaw
Prothonotary

per CC

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830

Lap over margin

12-14-03
Clerk of D.J.C.
to C/14
ATTY