

175
DOCKET NO. _____

NUMBER TERM YEAR

93 November 1961

Catherine J. Shaffer

VERSUS

James P. Moore, and

The County National Bank at Clif.

In the Court of Common Pleas of Clearfield County, Pennsylvania,

CATHERINE J. SHAFFER

versus

JAMES P. MOORE,

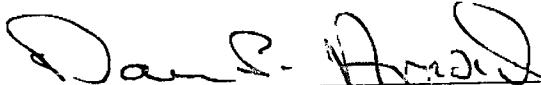
and
THE COUNTY NATIONAL BANK AT
CLEARFIELD

To Prothonotary of said Court, Sir:

No. 93, November Term, ~~19~~⁶¹

Enter my appearance for the defendants, James P. Moore.
and The County National Bank at Clearfield

Date November 29 19⁶¹



Dan C. Arnold
Attorneys for James P. Moore
Defendants

IN THE

Court of Common Pleas

OF

Clearfield County, Pennsylvania

No. 93, November Term, 19461

CATHERINE J. SHAFFER

versus

JAMES P. MOORE
and
THE COUNTY NATIONAL BANK AT
CLEARFIELD

DAN P. ARNOLD
ATTORNEY AT LAW
CLEARFIELD, PA.

Catherine T Shaffer

VERSUS

James P Moore

County Nat. Bank of Ccf&J

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PA.

No. 23 Term Nov 1961

To Wm T. Hartley

Prothonotary.

Sir: Enter appearance for

Place the above case on the next trial list

in above case.

Wm T. Hartley

Attorney for PLJ

No. _____ Term _____ 19 _____

vs.

APPEARANCE

For _____

(E)

10/10/

Mr. T. HAGERTY
PROBATIONARY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Catherine J. Shaffer : No. 93 November Term, 1961

vs

2

James P. Moore and
County National Bank : Complaint In Trespass

NOW, November 17, 1961 at 10:50 o'clock A.M. served the within Complaint In Trespass on James P. Moore at place of employment, County National Bank at Clearfield, Pa., corner of 2nd and Market Streets, Clearfield, Pennsylvania by handing to him personally a true and attested copy of the original Complaint In Trespass and made known to him the contents thereof.

NOW, November 17, 1961 at 10:50 o'clock A.M. served the within
Complaint In Trespass on County National Bank at Clearfield, Pa.
at place of business, corner of Second and Market Streets, Clearfield,
Pennsylvania by handing to James P. Moore, Assistant Cashier of
County National Bank at Clearfield, Pa. a true and attested copy of
the original Complaint In Trespass and made known to him the contents
thereof.

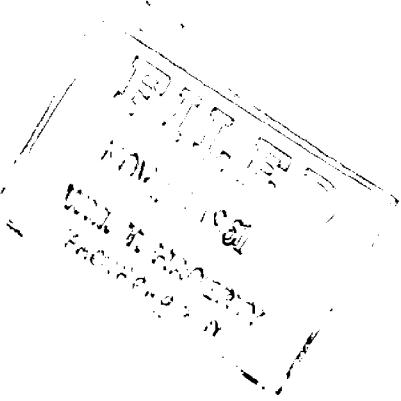
COSTS: Sheriff Ammerman \$10.00
(Paid by Atty Kelley)

So answers,

Charles G. Ammerman
CHARLES G. AMMERMAN
Sheriff

Sworn to before me this 17th
day of November A. D. 1961.

W^m T. Hogeneity
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CATHERINE J. SHAFER

VS.

JAMES P. MOORE, and
THE COUNTY NATIONAL
BANK AT CLEARFIELD

NO. 93, November Term, 1961

To: CARL E. WALKER, PROTHONOTARY

Mark the above case satisfied and discontinued upon
the payment of costs.

E. T. Kelley
EDWARD T. KELLEY, Atty. for Plaintiff

Kelley- 18.00
Pre 4.50



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CATHERINE J. SHAFFER :

VS : No. 93 November Term, 1961

JAMES P. MOORE :

and :

THE COUNTY NATIONAL BANK :

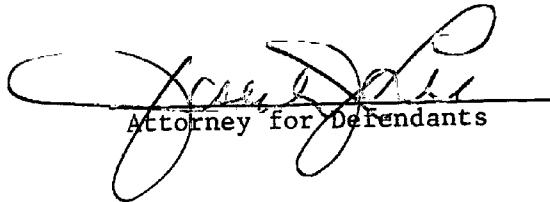
AT CLEARFIELD :

P R A E C I P E

TO: CARL E. WALKER, PROTHONOTARY

SIR:

Enter my appearance along with that of Dan P. Arnold as
attorney for the defendants in the above entitled matter.



Attorney for Defendants

Dated: February 6, 1962

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 93 November Term, 1961

CATHERINE J. SHAFFER

VS

JAMES P. MOORE and THE
COUNTY NATIONAL BANK AT
CLEARFIELD

P R A E C I P E

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CATHERINE J. SHAFFER :
VS. :
JAMES P. MOORE : NO. 93 } U.V. : Term, 1961
and :
THE COUNTY NATIONAL BANK :
AT CLEARFIELD :

AND NOW, to wit, this 16 day of November, 1961
comes the Plaintiff, Catherine J. Shaffer, and by her attorney,
Edward T. Kelley, brings this action of trespass against the
Defendants, James P. Moore, and The County National Bank at Clear-
field, Pennsylvania to recover for injuries upon a cause of action
whereof the following is a statement:

1. The Plaintiff is an individual residing on Glen
Richey Road, Lawrence Township, Clearfield County, Pennsylvania.

2. The Defendant, James P. Moore, is an individual
residing at 508 South Fourth Street, Clearfield, Pennsylvania,
and is employed at The County National Bank at Clearfield.

3. The Defendant, The County National Bank at Clear-
field, Pennsylvania is a National Banking Institution with prin-
cipal offices in Clearfield, Pennsylvania.

4. On or about 4 p.m. on the 21st day of December,
1959, the Plaintiff was lawfully driving her Pontiac Sedan on
Old Town Road in the direction of Curwensville, Pennsylvania
on her own side of the road.

5. While Plaintiff was lawfully driving toward Curwens-
ville, Pennsylvania the automobile of the Defendant, James P.
Moore, who was proceeding toward Clearfield, came over from his
own right side of the road, and struck the car of Plaintiff, who
was on her own side of the road causing injuries to her, herein-
after more fully set forth.

6. At the time of said accident, the Defendant, James P. Moore, was acting as agent for The County National Bank at Clearfield and at the time was within the scope of his employment and upon the business of and subject to the actual or potential control of the said County National Bank.

7. The Defendant, James P. Moore, was negligent and through him as its agent, The County National Bank was negligent:

- (a) In failing to have chains on his car in the first deep snow of the season;
- (b) In operating his automobile at a rate of speed which was high and dangerous under the circumstances;
- (c) In failing to see the car of the Plaintiff in sufficient time to avoid a collision;
- (d) In failing to have his car under adequate and proper control;
- (e) In failing to stay on his own right-hand traffic lane and instead crossing over and invading the traffic lane of Plaintiff;
- (f) In otherwise failing to regard the right and safety of the Plaintiff.

8. As a result of the said negligence of the Defendants, the Plaintiff was knocked, thrown and jostled about in her car whereby she sustained serious injuries to wit: . . .

- (a) Whiplash injury to her neck.
- (b) Contusions and swelling of both knees.
- (c) Contusions of left shoulder and left arm, and the right side of the face. Contusions and twisting of the right foot.
- (d) Fracture of bone under right cheek with scar remaining.
- (e) Severe bruising of head followed by headaches on right side of head.
- (f) Neuralitis and arthritis have developed since accident.
- (g) Femoral artery in right leg blocked; required a transplant of dacron artery from groin to below

right knee.

(h) The shock of the accident has persisted so that her nerves are affected and she cannot sleep.

(i) General pain and discomfort plus dental trouble on the right side of the mouth.

9. By reason of said injuries, so received as aforesaid, the Plaintiff has undergone great mental and physical pain and suffering, and will in the future undergo further pain and suffering, and may as a result be forced to stop work in her profession as a nurse.

10. By reason of the injuries as aforesaid, the Plaintiff has been compelled to pay out and incur large sums of money for medicine, medical attendance, hospital bills, nursing service, and other proper and necessary things in an effort to restore her health.

11. Also, be reason of the accident, the Plaintiff's car was damaged, and it was necessary for the Plaintiff to trade in her car and in so trading she had a loss of \$100 in the adjustment, and a sales tax and title transfer of \$56 together with a transfer of the radio of her wrecked car of \$9.52 making a total of \$165.56. In addition thereto, in the care and treatment of her injuries, she had the following expenses:

Clearfield Hospital

X Rays- - - - -	\$.75.00
Dressing room- - - - -	12.50
E.K.G. for chest pain- - - - -	10.00
Dr. Erhard- - - - -	15.00
Dr. Arnold- - - - -	
Drugs at cost - - - - -	30.00
Loss of wages for 10 weeks - - - - -	650.00
To St. Marys - Consult Dr. Minn	
2 days work - - - - -	2.00
16 $\frac{1}{2}$ miles - 2 trips-Mileage- - -	16.40

Cleveland Clinic

Consult Doctor and support for right leg - - 367.50

Mileage - four trips - 1576 miles - - - - - 157.60

12. By reason of the said expected permanent disabilities, the Plaintiff will in the future be compelled to expend further sums of money to cure her disabilities and ease the pain caused by the accident.

13. Wherefore, the Plaintiff claims damages in excess of \$5000.00, hence this suit.

John T. Kelly

Attorney for the Plaintiff

COMMONWEALTH OF PENNSYLVANIA : : SS.
COUNTY OF CLEARFIELD : :

CATHERINE J. SHAFFER, being duly sworn according to law deposes and says, that the facts set forth in the foregoing Complaint are true and correct, according to the best of her knowledge, information and belief.

Catherine J. Shaffer
Catherine J. Shaffer

Sworn and subscribed to
before me this, 6th day of
May, 1961

John T. Dugay
Notary Public

My com. expires: Dec. 1961
My Commission Exp'd.
1st year day 1961

95 Mar 1961 *return date*

IN THE COURT OF COMMON
PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CATHERINE J. SHAFFER

VS

JAMES P. MOORE, and

THE COUNTY NATIONAL BANK AT
CLEARFIELD

TO THE WITNESS Defendant
YOU ARE REQUIRED TO FILE
One copy

TO James Complainant
WITHIN 10 DAYS FROM
HEARING Second Holley

At any time before the trial

FILED

NOV 16 1961

EDWARD HAGERTY
PROTHONOTARY

CLEARFIELD, PA
5,000 *copy*