

03-1317-CD  
THOMAS DONAHUE, et al. vs. ERIC C. LUNDGREN M.D. et al.

R. J. MARZELLA & ASSOCIATES, P.C.  
BY: Robin J. Marzella, Esquire  
Pennsylvania Supreme Court I.D. No. 66856  
3513 North Front Street  
Harrisburg, PA 17110  
Telephone: (717) 234-7828  
Facsimile: (717) 234-6883

Attorneys for Plaintiffs,  
Thomas Donahue and  
Carol Donahue

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 03-1317-CO 2003  
Civil Action  Law  
 Equity

THOMAS DONAHUE and CAROL  
DONAHUNE,  
312 East Weber Street  
DuBois, PA 15801

: ERIC C. LUNDGREN, M.D.  
: 605 South Main Street  
: DuBois, PA 15801

:  
versus

: PAULA A. LUNDGREN, M.D.  
: 605 South Main Street  
: DuBois, PA 15801

:  
: DUBOIS REGIONAL MEDICAL CENTER  
: 100 Hospital Avenue  
: DuBois, PA 15801

Plaintiffs : Defendants

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY OF SAID COURT:

Please issue a writ of summons in the above-captioned action.

Writ of Summons shall be issued and forwarded to:

Robin Marzella, Esquire  
3513 North Front Street  
Harrisburg, PA 17110  
(717) 234-7828

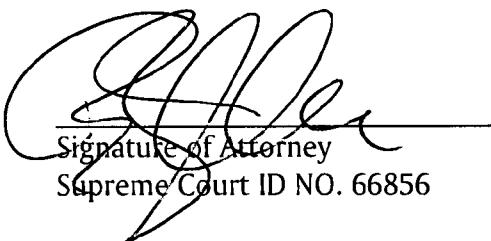
Dated: 9/4/03

FILED

ma230/atty margele  
02 85 00  
SEP 05 2003  
ccatty  
w/summons

William A. Shaw  
Prothonotary/Clerk of Courts

Attorney  
 Sheriff

  
Signature of Attorney  
Supreme Court ID NO. 66856

**WRIT OF SUMMONS**

TO THE ABOVE NAMED DEFENDANTS: Eric Lundgren, M.D., Paula Lundgren, M.D., and DuBois Regional Medical Center.

YOU ARE HEREBY NOTIFIED THAT THE ABOVE-NAMED PLAINTIFFS HAVE COMMENCED AN ACTION AGAINST YOU.



Prothonotary

Date: 9/5/03

By: \_\_\_\_\_  
Deputy

Check here if reverse is used for additional information.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

THOMAS DONAHUE and CAROL  
DONAHUE,

Plaintiffs,

Vs.

ERIC C. LUNDGREN, M.D., PAULA A.  
LUNDGREN, M.D. and DuBOIS  
REGIONAL MEDICAL CENTER,

Defendants.

CIVIL DIVISION

No. 03-1317-CD

Issue No.

PRAECIPE FOR APPEARANCE

Filed on behalf of DuBois Regional Medical  
Center, one of the defendants.

Counsel of Record for This Party:

David R. Johnson, Esquire  
PA I.D. #26409

THOMSON, RHODES & COWIE, P.C.  
Firm #720  
1010 Two Chatham Center  
Pittsburgh, PA 15219

(412) 232-3400

FILED

OCT 10 2003  
m/11/30/03  
William A. Shaw  
Prothonotary/Clerk of Courts

*[Signature]*  
No C.R.M.

*[Signature]*

PRAECLYPE FOR APPEARANCE

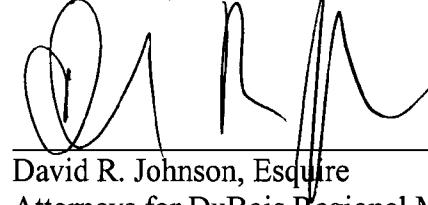
TO: PROTHONOTARY

Kindly enter our appearance on behalf of DuBois Regional Medical Center, one of the defendants.

JURY TRIAL DEMANDED.

Respectfully submitted,

THOMSON, RHODES & COWIE, P.C.

A handwritten signature consisting of three distinct loops and a vertical line with a small flourish.

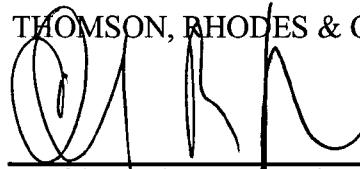
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David R. Johnson, Esquire  
Attorneys for DuBois Regional Medical  
Center, one of the defendants.

**CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of the within PRAECIPE FOR APPEARANCE has been served upon the following counsel of record and same placed in the U.S. Mails on this 8th day of Oct., 2003:

Robin Marzella, Esquire  
Marzella & Associates  
3513 North Front Street  
Harrisburg, PA 17110

THOMSON, RHODES & COWIE, P.C.  
  
David R. Johnson, Esquire  
Attorneys for DuBois Regional Medical Center, one of the defendants.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

THOMAS DONAHUE and CAROL  
DONAHUE,

Plaintiffs,

Vs.

ERIC C. LUNDGREN, M.D., PAULA A.  
LUNDGREN, M.D. and DuBOIS  
REGIONAL MEDICAL CENTER,

Defendants.

CIVIL DIVISION

No. 03-1317-CD

Issue No.

PRAECIPE FOR RULE FOR COMPLAINT

Filed on behalf of DuBois Regional Medical  
Center, one of the defendants.

Counsel of Record for This Party:

David R. Johnson, Esquire  
PA I.D. #26409

THOMSON, RHODES & COWIE, P.C.  
Firm #720  
1010 Two Chatham Center  
Pittsburgh, PA 15219

(412) 232-3400

FILED

OCT 10 2003  
m/11-701  
William A. Shaw  
Prothonotary/Clerk of Courts

NO CERT  
Rule to Answer

EJF

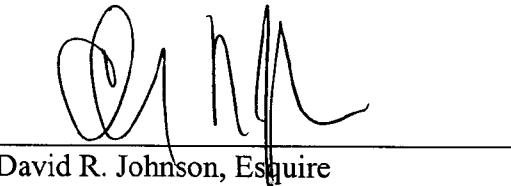
PRAECIPE FOR RULE FOR COMPLAINT

TO: PROTHONOTARY

Kindly issue a rule on plaintiffs to file their complaint within twenty days.

Respectfully submitted,

THOMSON, RHODES & COWIE, P.C.



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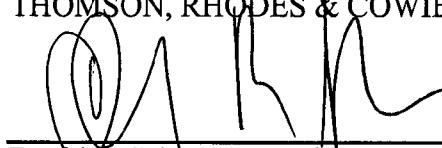
David R. Johnson, Esquire  
Attorneys for DuBois Regional Medical  
Center, one of the defendants.

**CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of the within PRAECIPE FOR RULE FOR COMPLAINT has been served upon the following counsel of record and same placed in the U.S. Mails on this 8th day of Oct., 2003:

Robin Marzella, Esquire  
Marzella & Associates  
3513 North Front Street  
Harrisburg, PA 17110

THOMSON, RHODES & COWIE, P.C.

  
\_\_\_\_\_  
David R. Johnson, Esquire  
Attorneys for DuBois Regional Medical  
Center, one of the defendants.

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

Thomas Donahue  
Carol Donahue

Vs. Case No. 2003-01317-CD  
Eric C. Lundgren MD  
Paula A Lundgren MD  
DuBois Regional Medical Center

RULE TO FILE COMPLAINT

TO: Thomas Donahue and Carol Donahue

YOU ARE HEREBY RULED to file a Complaint in the above-captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.

---

William A. Shaw, Prothonotary

Dated: October 10, 2003

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

**DONAHUE, THOMAS & CAROL DONAHUNE**

**VS.**

**LUNDGREN, ERIC C. M.D. al**

**PRAECIPE & WRIT OF SUMMONS**

**Sheriff Docket # 14617**

**03-1317-CD**

**SHERIFF RETURNS**

NOW OCTOBER 1, 2003 AT 10:15 AM SERVED THE WITHIN PRAECIPE & SUMMONS ON DUBOIS REGIONAL MEDICAL CENTER, DEFENDANT AT EMPLOYMENT, 100 HOSPITAL AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO GREG VOLPE, RISK MANAGEMENT A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE & SUMMONS AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW OCTOBER 1, 2003 AT 10:20 AM SERVED THE WITHIN PRAECIPE & SUMMONS ON ERIC C. LUNDGREN, M.D., DEFENDANT AT EMPLOYMENT, 605 SOUTH MAIN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LORI HEATH, RECEPTIONIST A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE & SUMMONS AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW OCTOBER 1, 2003 AT 10:20 AM SERVED THE WITHIN PRAECIPE & SUMMONS ON PAULA A. LUNDGREN, M.D., DEFENDANT AT EMPLOYMENT, 605 SOUTH MAIN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LORI HEATH, RECEPTIONIST A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE & SUMMONS AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

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**Return Costs**

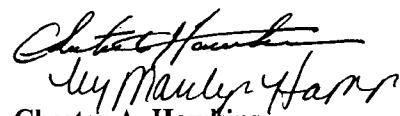
| <b>Cost</b>  | <b>Description</b>                            |
|--------------|---|
| <b>44.05</b> | <b>SHERIFF HAWKINS PAID BY: ATTY CK# 9660</b> |
| <b>30.00</b> | <b>SURCHARGE PAID BY: ATTY CK# 9660</b>       |

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**Sworn to Before Me This**

13th Day Of Oct 2003  
William A. Shaw

**So Answers,**

  
Chester A. Hawkins  
Sheriff

**FILED**

OCT 13 2003

  
William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

THOMAS DONAHUE and CAROL  
DONAHUE,

Plaintiffs,

Vs.

ERIC C. LUNDGREN, M.D., PAULA A.  
LUNDGREN, M.D. and DuBOIS  
REGIONAL MEDICAL CENTER,

Defendants.

CIVIL DIVISION

No. 03-1317-CD

Issue No.

AFFIDAVIT OF SERVICE OF RULE FOR  
COMPLAINT

Filed on behalf of DuBois Regional Medical  
Center, one of the defendants.

Counsel of Record for This Party:

David R. Johnson, Esquire  
PA I.D. #26409

THOMSON, RHODES & COWIE, P.C.  
Firm #720  
1010 Two Chatham Center  
Pittsburgh, PA 15219

(412) 232-3400

**FILED**

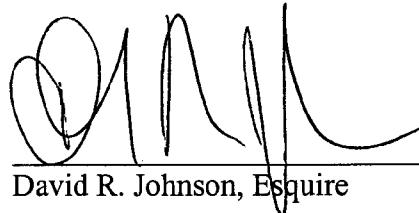
**OCT 30 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared David R. Johnson, Esquire, who, being duly sworn, deposes and says that a true and correct copy of the Rule to File a Complaint in the above-captioned case was served upon plaintiff's counsel, Robin Marzella, Esquire, Marzella & Associates, 3513 North Front Street, Harrisburg, PA 17110, by certified mail, return receipt requested, and that the same was received on her behalf on 10-20-03 as shown by the return receipt attached hereto.

Respectfully submitted,

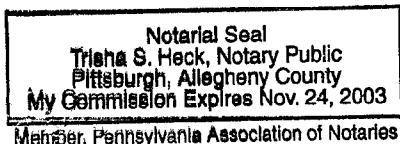


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David R. Johnson, Esquire

Sworn to and subscribed before me  
this 28th day of October, 2003.

Trisha S. Heck  
Notary Public



Member, Pennsylvania Association of Notaries

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

Thomas Donahue  
Carol Donahue

Vs. Case No. 2003-01317-CD  
Eric C. Lundgren MD  
Paula A Lundgren MD  
DuBois Regional Medical Center

RULE TO FILE COMPLAINT

TO: Thomas Donahue and Carol Donahue

YOU ARE HEREBY RULED to file a Complaint in the above-captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.



\_\_\_\_\_  
William A. Shaw, Prothonotary

Dated: October 10, 2003

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

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Robin Marzella, Esq.  
Marzella + Assoc.  
3513 North Front St.  
Harrisburg, PA  
17110

2. Article Number  
(Transfer from sen)

7002 3150 0000 8705 5742

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

Meredith Marzella  Agent  
 Addressee

B. Received by (Printed Name)

Meredith Marzella 10/20

C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

|  |   |
|--|---|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail                   |
| <input type="checkbox"/> Registered                | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail              | <input type="checkbox"/> C.O.D.                         |

4. Restricted Delivery? (Extra Fee)

 Yes

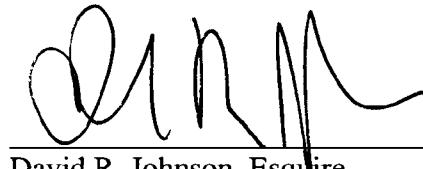
CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of the within AFFIDAVIT OF SERVICE OF RULE FOR COMPLAINT has been served upon the following counsel of record and same placed in the U.S. mails on this 28<sup>th</sup> day of Oct., 2003:

Robin Marzella, Esquire  
Marzella & Associates  
3513 North Front Street  
Harrisburg, PA 17110

Respectfully submitted,

THOMSON, RHODES & COWIE, P.C.



---

David R. Johnson, Esquire  
Attorneys for DuBois Regional Medical  
Center, one of the defendants.

R. J. MARZELLA & ASSOCIATES, P.C.  
BY: Robin J. Marzella, Esquire  
Pennsylvania Supreme Court I.D. No. 66856  
3513 North Front Street  
Harrisburg, PA 17110  
Telephone: (717) 234-7828  
Facsimile: (717) 234-6883

Attorneys for Plaintiffs,  
Thomas Donahue and  
Carol Donahue

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

|   |   |                       |
|---|---|-----------------------|
| THOMAS DONAHUE and CAROL<br>DONAHUNE,   | : | DOCKET No. 03-1317-CO |
| Plaintiffs  | : | CIVIL ACTION- LAW     |
|   | : |                       |
|   | : |                       |
| v.  | : |                       |
|   | : |                       |
|   | : |                       |
| ERIC C. LUNDGREN, M.D., and PAULA A.<br>LUNDGREN, M.D., and DUBOIS REGIONAL<br>MEDICAL CENTER | : |                       |
|   | : |                       |
| Defendants  | : | JURY TRIAL REQUESTED  |

PRAECIPE TO DISCONTINUE ACTION

TO: The Prothonotary of Clearfield County

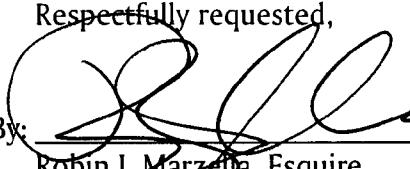
Pursuant to Pa.R.C.P. 229, please mark the above action as settled, discontinued, and ended as to all Defendants.

**FILED**

NOV 26 2003

William A. Shaw  
Prothonotary

Dated: November 24, 2003

Respectfully requested,  
By:   
Robin J. Marzella, Esquire  
Supreme Court Identification No. 66856

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all parties of record this 24 day of November, 2003 by depositing said copy in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class delivery, and addressed as follows:

Kristin Moyles  
MIIX  
716 Gypsy Lane  
Pittsburgh, PA 15228

David R. Johnson, Esquire  
Thomson, Rhodes & Cowie, P.C.  
Two Chatham Center, Tenth Floor  
Pittsburgh, PA 15219-3499

R. J. MARZELLA & ASSOCIATES, P.C.  
By:   
Robin J. Marzella

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

**CIVIL DIVISION**

**Thomas Donahue**

**Carol Donahue**

**Vs.**

**No. 2003-01317-CD**

**Eric C. Lundgren MD**

**Paula A Lundgren MD**

**DuBois Regional Medical Center**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA

County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on November 26, 2003, marked:

Discontinued, Settled and Ended.

Record costs in the sum of \$159.05 have been paid in full by Attorney.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 26th day of November A.D. 2003.

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William A. Shaw, Prothonotary