

03-1464-CD  
PEERLESS INSURANCE CO.etal. vs. WILLIAM GOODROW

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiff

Peerless Insurance Company  
A/S/O Patricia Martell  
PO Box 8851  
Camp Hill, PA 17001-8851  
**AND**  
Patricia Martell  
23781 Shawville Frenchville Highway  
Frenchville, PA 16836

: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law  
: No: 03-1464-CD

vs.

William Goodrow  
RR #1, Box 506  
Woodland, PA 16881

**Praecipe to Issue Writ of Summons**

Prothonotary:

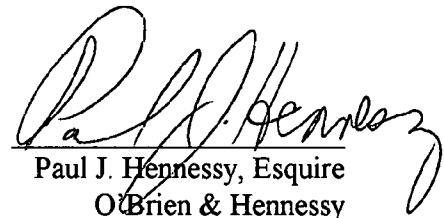
Kindly issue a Writ of Summons with regard to the above captioned case.

Please forward to the Sheriff for service.

**FILED**

SEP 29 2003

William A. Shaw  
Prothonotary/Clerk of Courts

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

FILED


1 cc Shff w/ Summons

012:1681  
SEP 29 2003

William A. Shaw  
Prothonotary/Clerk of Courts

Att. pd. 85.00

Jan. 30, 2004 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

  
Deputy Prothonotary

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

COPY

SUMMONS

**Peerless Insurance Company  
Patricia Martell**

**Vs.**

**NO.: 2003-01464-CD**

**William Goodrow**

TO: WILLIAM GOODROW

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 09/29/2003

---

William A. Shaw  
Prothonotary

Issuing Attorney:

Paul J. Hennessy, Esq.  
142 West Market Street  
West Chester, PA 19382



In The Court of Common Pleas of Clearfield County, Pennsylvania

PEERLESS INSURANCE COMPANY & PATRICIA MARTELL

VS.

GOODROW, WILLIAM

SUMMONS

Sheriff Docket # 14620

03-1464-CD

SHERIFF RETURNS

NOW OCTOBER 20, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN SUMMONS "NOT FOUND" AS TO WILLIAM GOODROW, DEFENDANT. ACCORDING TO POST OFFICE DEFENDANT RECEIVES HIS MAIL AT P.O. BOX 240, WOODLAND, PA. BUT DOES NOT KNOW THE PHYSICAL ADDRESS OF DEFENDANT. PERSON BY THE NAME OF JOHNSON LIVES AT RR#1 BOX 506, WOODLAND, PA.

Return Costs

Cost	Description
22.97	SHERIFF HAWKINS PAID BY: ATTY CK# 28046
10.00	SURCHARGE PAID BY: ATTY CK# 28115

Sworn to Before Me This

21<sup>st</sup> Day Of Oct 2003



So Answers,



Chester A. Hawkins

Sheriff

FILED

OCT 21 2003

William A. Shaw  
Prothonotary

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

**SUMMONS**

**Peerless Insurance Company  
Patricia Martell**

**Vs.**


**NO.: 2003-01464-CD**

**William Goodrow**

**TO: WILLIAM GOODROW**

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 09/29/2003

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

Issuing Attorney:

Paul J. Hennessy, Esq.  
142 West Market Street  
West Chester, PA 19382

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiffs

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell

: In The Court of Common Pleas

: Clearfield County, Pennsylvania

: Civil Action Law

vs.

: No: 03-1464-CD

William Goodrow

**PETITION FOR ALTERNATIVE SERVICE**

AND NOW, Plaintiff by and through their attorney, Paul J. Hennessy, Esquire,  
hereby make petition to this Court for alternative service pursuant to PA R.C.P. 430  
and in support thereof, state the following:

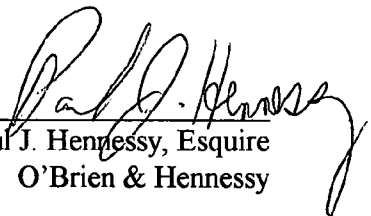
1. The civil Writ of Summons was filed on September 23, 2003, listing  
Defendant residing at RR #1, Box 506, Woodland, PA 16881.
2. Attempts were made to serve the Defendant on October 20, 2003 by  
Sheriff service.
3. Plaintiffs have confirmed the Defendant's address as PO Box 240,  
Woodland, PA 16881 via a skip trace, postal check and Sheriff return, copies of which  
are attached hereto.

**FILED**

**JAN 09 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

**WHEREFORE**, Plaintiffs seek an order from the Court in view of the fact that the Defendant appears to be either unavailable or deliberately concealing his/her whereabouts, permitting service by mailing to the aforesaid Post Office Box.

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy



Peerless Insurance Company  
A/S/O Patricia Martell

AND

Patricia Martell

vs.

William Goodrow

: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law  
: No: 03-1464-CD

AFFIDAVIT

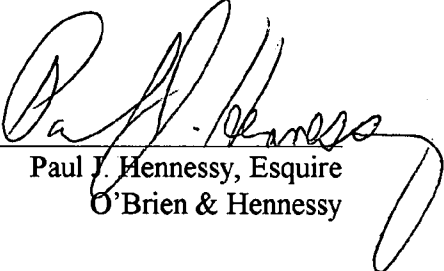
STATE OF PENNSYLVANIA:

: ss.

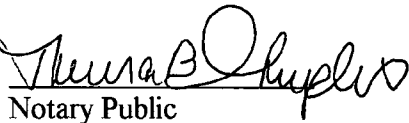
COUNTY OF CHESTER :

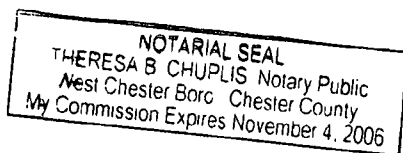
Paul J. Hennessy, Esquire, being duly sworn according to law, deposes and says that he represents the Plaintiff(s) in the above entitled case; that he is authorized to make this affidavit on behalf of the Plaintiff(s); and that he has put forth a good faith effort to locate the defendant.

Plaintiffs have confirmed that Defendant's only know address is PO Box 240, Woodland, PA 16881 via a postal check, skip trace and sheriff return. (attached)

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

Sworn to and subscribed  
before me this 7<sup>TH</sup> day  
of JANUARY, 2004

  
Notary Public



Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiffs

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell

: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law

vs.

: No: 03-1464-CD

William Goodrow

**Memorandum of Law in Support of Plaintiffs'**  
**Petition for Alternative Service**

When Service cannot be made under the regular service methods, the Plaintiff under Pennsylvania Rules of Civil Procedure No. 430(a) may make a motion for special order directing an alternative or substitute method of service usually by mail. Such a motion must be accompanied by an affidavit stating the nature and extent of the investigation made to determine the whereabouts of the Defendant and the reasons why service cannot be made by the regular means.

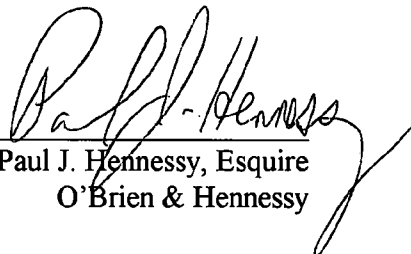
In Colavecchi v. Knarr, 311 Pa. Super 58 (1983) it was concluded the fact that a sheriff could not make service at the address furnished to him by Plaintiff did not convert Defendants into persons whose whereabouts were "unknown".

In Deer Park Lumber, Inc. v. Major, 559 A.2d 941 it was determined that more than a mere paper search is required before resort can be had to the publication provisions of Rule 430.

In Lorenzo Penn v. Stuart Raynor, 1989 U.S. Dist., Lexis 12549 it was stated that a good faith effort to locate the Defendant must be made. Such an effort includes;

(1) inquires of postal authorities including inquires pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (2) inquires of relatives, neighbors, friends and employers of the Defendant and (3) examination of local telephone directories, voter registration records and motor vehicle records.

In the instant case Plaintiff has made a "good faith" effort.

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

CAN

# Skip Tracing Inc.

PO Box 286  
Metuchen, NJ 08840  
732-548-7741  
FAX 732-548-8026

Date: Aug 14, 2003  
AT

POSTMASTER  
WOODLAND, PA 16881

## REQUEST FOR CHANGE OF ADDRESS OR BOXHOLDER INFORMATION NEEDED FOR SERVICE OF LEGAL PROCESS

Please furnish the new address or the name and street address (if a box holder) for the following: --

NAME: WILLIAM GOODROW

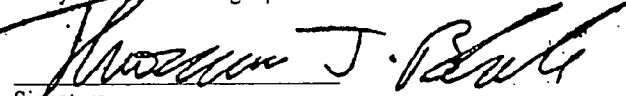
ADDRESS: P.O. BOX 240, WOODLAND, PA 16881

The following is provided in accordance with 39CFR265.6(D)(6)(II). THERE IS NO FEE FOR PROVIDING BOXHOLDER INFORMATION. The fee for providing change of address information is waived in accordance with 39CFR 265.6 (d) (1) and (2) and corresponding Administrative Support Manual 352.44

1. Capacity of Requester: PROCESS SERVER
2. Statute or regulation that empowers me to serve process: NJ STATUTE 45:19-22  
NEW JERSEY STATE POLICE PRIVATE DETECTIVE LICENSE NUMBER 4323.
3. The names of all parties known to the litigation: O'BRIEN & HENNESSY Vs GOODROW
4. The court in which the case has been or will be heard: MIDDLESEX COUNTY SPECIAL CIVIL PART
5. The docket or other identifying number if one has been issued: WILLIAM GOODROW
6. The capacity in which the individual is to be served: DEFENDANT

### WARNING

The submission of false information to obtain and use change of address information for any purpose other than the service of legal process in connection with actual or prospective litigation could result in criminal penalties including a fine of up to \$10,000.00 or imprisonment or (2) to avoid payment of the fee for change of address information of not more than 5 years or both (Title 17 U.S.C. Section 1001). I certify that the above information is true and that the address information is needed and will be used solely for service of legal process.

  
Signature  
THOMAS BLACK

PO BOX 286  
METUCHEN, NJ 08840

### FOR POST OFFICE USE ONLY

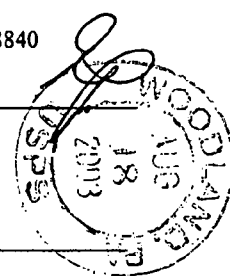
☒ GOOD AS ADDRESSED

☐ NOT KNOWN AT ADDRESS

☐ MOVED LEFT NO FORWARDING ADDRESS

☐ NO SUCH ADDRESS

NEW ADDRESS



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

PEERLESS INSURANCE COMPANY & PATRICIA MARTELL

VS.

GOODROW, WILLIAM

SUMMONS

Sheriff Docket # 14620

03-1464-CD

DE

**SHERIFF RETURNS**

NOW OCTOBER 20, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE  
WITHIN SUMMONS "NOT FOUND" AS TO WILLIAM GOODROW, DEFENDANT.  
ACCORDING TO POST OFFICE DEFENDANT RECEIVES HIS MAIL AT P.O. BOX 240,  
WOODLAND, PA. BUT DOES NOT KNOW THE PHYSICAL ADDRESS OF DEFENDANT.  
PERSON BY THE NAME OF JOHNSON LIVES AT RR#1 BOX 506, WOODLAND, PA.

**Return Costs**

Cost	Description
22.97	SHERIFF HAWKINS PAID BY: ATTY CK# 28046
10.00	SURCHARGE PAID BY: ATTY CK# 28115

Sworn to Before Me This

\_\_\_\_ Day Of \_\_\_\_\_ 2003

So Answers,



**Chester A. Hawkins**  
Sheriff

**SKIP TRACING, INC.**  
P.O. BOX 286  
METUCHEN, NEW JERSEY 08840  
Tel: (732) 548-7741 Fax: (732) 548-8026

**CONFIDENTIAL SKIP TRACE REPORT AND INVOICE**

*prepared for*

**O'Brien & Hennessy  
142 West Market Street  
West Chester, PA 19382  
CASE # WILLIAMGOODROW**

DATE :	11/25/03
CASE DESCRIPTION	Home Address
INSURED/PLAINTIFF	Martell
DATE OF LOSS	09/24/02
NAME	William Joseph Goodrow
ADDRESS	P.O. Box 240
CITY, STATE ZIP	Woodland, PA 16881
TELEPHONE	
SOCIAL SECURITY	
DRIVERS LICENSE #	
DATE OF BIRTH	
PLACE OF EMPLOYMENT	
ADDRESS	
CITY, STATE ZIP	
TELEPHONE	
POSITION	
INCOME \$	
BANK	
BANK ADDRESS	
CITY, STATE ZIP	
TELEPHONE	
BANK ACCT #	
BALANCE \$	
REAL PROPERTY	
COMMENTS	Post office box number confirmed by Postmaster in Woodland, PA. There is no physical address for William, but he does pick up his mail regularly.

**FEE \$ 0.00 Please make checks payable to Skip Tracing, Inc. Fed Tax ID # 22-305-6426**

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiffs

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell

: In The Court of Common Pleas  
:  
: Clearfield County, Pennsylvania  
:  
: Civil Action Law  
:  
: No: 03-1464-CD

vs.

William Goodrow

**ORDER**

AND NOW, this 13<sup>th</sup> day of January, 2004, upon  
consideration of Plaintiffs' Petition for Alternative Service and Memorandum of Law  
in support of, it is hereby ORDERED that Plaintiffs shall be permitted to serve the  
Defendant by MAILING (certified and regular) to PO Box 240, Woodland, PA  
16881.

BY THE COURT

  
J.

**FILED**

**JAN 13 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiffs

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell

: In The Court of Common Pleas

: Clearfield County, Pennsylvania

: Civil Action Law

vs.

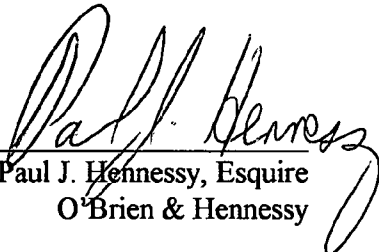
: No: 03-1464-CD

William Goodrow

**PRAECIPE**

To the Prothonotary:

Please reissue the Writ of Summons in the above action and return to the  
attorney for service by mail.

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

**FILED**

JAN 30 2004

W/ 3:00 PM  
William A. Shaw

Prothonotary/Clerk of Courts

1 copy to Att  
W/ W.A. Shaw



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

SUMMONS

Peerless Insurance Company  
A/S/O Patricia Martell  
AND  
Patricia Martell

Vs.

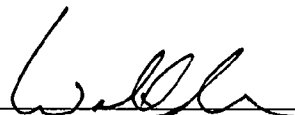
NO.: 2003-01464-CD

William Goodrow

TO: WILLIAM GOODROW

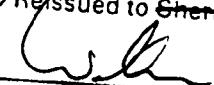
To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 09/29/2003

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

Issuing Attorney:

Paul Hennessy  
142 West Market Street  
West Chester, PA 19382

January 30, 2004 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
  
\_\_\_\_\_  
Deputy Prothonotary

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 West Market Street, Suite 2  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Peerless Insurance Company  
A/S/O Patricia Martell  
PO Box 8851  
Camp Hill, PA 17001-8851  
AND  
Patricia Martell  
23781 Shawville Frenchville Highway  
Frenchville, PA 16836  
vs.  
William Goodrow  
PO Box 240  
Woodland, PA 16881

: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law  
: No: 03-1464-CD

**FILED**

**MAR 08 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

#### 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.*

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641

#### AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleva esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641

5. On or about September 24, 2002 the defendant took the Plaintiffs vehicle without her permission from the Plaintiffs residence located at 23781 Shawville-Frenchville in Frenchville, PA. When the vehicle was recovered by The Pennsylvania State Police, it was in a damaged condition.

6. As the result of the negligent and/ or intentional conduct of the Defendant William Goodrow the Plaintiff was forced to incur property damage in the amount of \$6,554.30.

7. The negligence of the defendant consisted of:

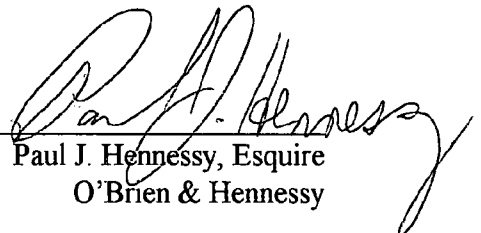
- a) Reckless and wanton disregard for Plaintiffs automobile;
- b) Failure to take proper safety precautions;
- c) Failing to warn Plaintiff;
- d) other such negligence that may be developed through continuing discovery and trial of this matter;

8. The defendant William Goodrow is liable to the Plaintiff for the damage to the Plaintiff's automobile.

9. The aforesaid damage resulted solely from the negligent acts and/or failure to act on part of Defendant named herein and were due in no manner whatsoever to any act and/or failure to act on part of Plaintiffs.

10. As a result of the aforesaid property damage, Plaintiff Peerless Insurance Company settled the claim of Plaintiff Milton Faulk in the amount of \$6,554.30 representing fair and reasonable reimbursement for the damages sustained.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the amount of \$6,554.30 plus costs.

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF CHESTER

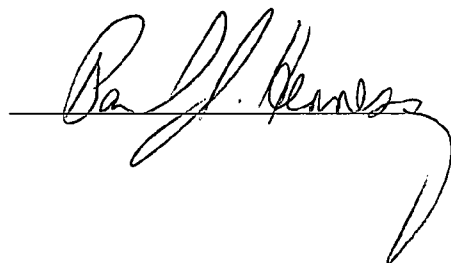
: ss

The undersigned verifies that the facts contained herein are true and correct.

The undersigned understands that false statements herein are made subject to the penalties of 19 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

If applicable, this affidavit is made on behalf of the Plaintiff(s); that the said Plaintiff(s) is/are unable and unavailable to make this verification on its/his/her own behalf within the time allotted for filing of this pleading, and the facts set forth in the foregoing pleading are true and correct to the best of counsel's knowledge, information and belief.

This verification is made pursuant to Pa. R.C.P. 1024 and is based on interviews, conferences, reports, records and other investigative material in the file

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

Dated: 2-24-04

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiff

Peerless Insurance Company  
A/S/O Patricia Martell  
AND  
Patricia Martell

: In The Court of Common Pleas  
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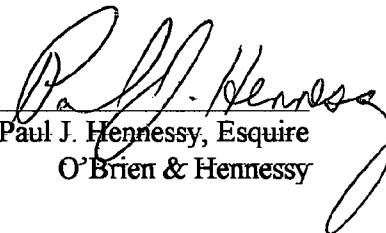
**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CHESTER

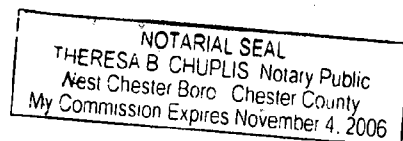
: ss.

Paul J. Hennessy, Esquire, being duly sworn according to law deposes and says that he has served a true and correct copy of the Writ of Summons filed in the above captioned action upon the Defendant by first class United States mail, and first class United States mail certified, return receipt requested, and that Defendant did accept service of the same on, February 19, 2004 as evidenced by the attached sender's receipts.

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

Sworn to and subscribed  
before me this 20 day  
of MARCH, 2004.

  
NOTARY PUBLIC



**FILED**

**MAR 08 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

7002 3150 0002 2644 9234

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 37	2-17-04  Postmark Here
Certified Fee	230	
Return Receipt Fee (Endorsement Required)	1.75	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.42	

Sent To	WILLIAM GOODROW
Street, Apt. No., or PO Box No.	P.O. BOX 240
City, State, ZIP+4	WOODLAND, PA 16881

PS Form 3800, June 2002 See Reverse for Instructions

**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:

WILLIAM GOODROW  
 P.O. BOX 240  
 WOODLAND, PA  
 16881

2. Article Number (Copy from service label)

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery  
 PAUL MARTEN 2-17-04

C. Signature  
 X *Paul Marten* ☐ Agent  
☐ Addressee

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

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7002 3150 0002 2644 9234



Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiff

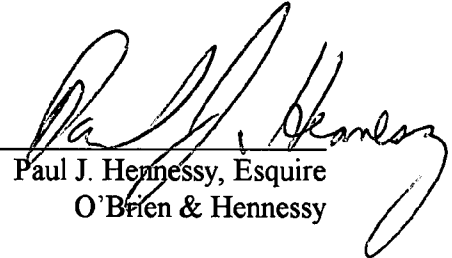
Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell  
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: No: 03-1464-CD

**CERTIFICATION OF SERVICE**

I hereby certify that I have served a true and correct copy of the Complaint filed in the  
above captioned action upon the Defendant on March 18, 2004, by First Class United  
States mail, addressed as follows:

William Goodrow  
PO Box 240  
Woodland, PA 16881

  
Paul J. Hennessy, Esquire  
O'Brien & Hennessy

**FILED**

MAR 31 2004

William A. Shaw  
Prothonotary

Paul J. Hennessy, Esquire  
O'Brien & Hennessy  
142 W. Market Street  
West Chester, PA 19382  
610-431-2727  
Attorney I.D. 65396

Attorney for Plaintiffs

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

md/2:40/01  
AUG 13 2004

ICC & Notice  
to Def.

Statement to

Ally pd. 20.00

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell  
vs.  
William Goodrow

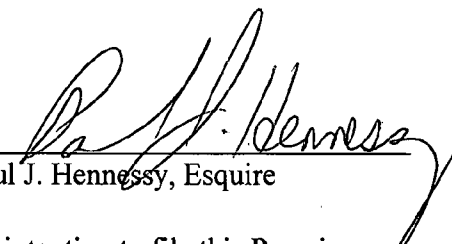
: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law  
: No: 03-1464-CD

**PRAECIPE FOR JUDGMENT**

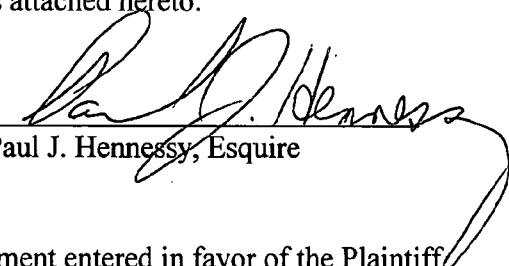
TO THE PROTHONOTARY:

Enter Judgment in the above case by default for want of response to the Complaint filed against the Defendant, and assess the damages as per the statement below:

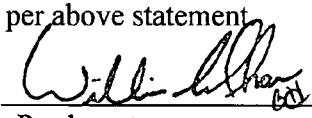
Real Debt: \$6,554.30

  
Paul J. Hennessy, Esquire

I hereby certify that written notice of the intention to file this Praecipe was mailed to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the filing of this Praecipe. A copy of said notice is attached hereto.

  
Paul J. Hennessy, Esquire

And now, August 13, 2004, Judgment entered in favor of the Plaintiff and against the Defendant by default for want of response to the Complaint and damages assessed at the sum of \$6,554.30 as per above statement.

  
Prothonotary





**OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS**

Dated: June 3, 2004

To: William Goodrow  
PO Box 240  
Woodland, PA 16881

Peerless Insurance Company  
A/S/O Patricia Martell  
AND  
Patricia Martell

vs.

William Goodrow

**COURT OF COMMON PLEAS**

Clearfield County, Pennsylvania

Civil Action Law

No. 03-1464-CD

**Notice, Rule 237.5  
Notice of Praeipce to Enter Judgment by Default**

**IMPORTANT NOTICE**

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the Court your defenses or objections to the claims set forth against you. Unless you act within ten days from the date of this notice, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641

**NOTIFICACION IMPORTANTE**

Usted se encuentra en estado de rebeldia por no haber presentado una comparecencia escrita, ya sea personalmente o por abogado y por no haber radicado por escrito con este Tribunal sus defensas u objeciones a los reclamos formulados en contra suyo. Al no tomar la accion debida dentro de *diez (10) dias* de la fecha de esta notificacion, el Tribunal podra, sin necesidad de comparecer usted en corte u oir preuba alguna, dictar sentencia en su contra y usted podria perder bienes u otros derechos importantes. Debe llevar esta notificacion a un abogado inmediatamente. Si usted no tiene abogado, o si no tiene dinero suficiente para tal servicio, vaya en persona o llame por telefono a la oficina, nombrada para averiguar si puede conseguir asistencia legal.

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641

**If you have any questions concerning this notice, please call:**

Paul J. Hennessy, Esquire

*(Name of Attorney or Plaintiff)*

142 West Market Street, Suite 2, West Chester, PA 19382

*(Attorney's or Plaintiff's Address)*

at this telephone number: 610-431-2727

Peerless Insurance Company  
A/S/O Patricia Martell

AND

Patricia Martell

vs.

William Goodrow

: In The Court of Common Pleas  
: Clearfield County, Pennsylvania  
: Civil Action Law  
: No: 03-1464-CD

**AFFIDAVIT OF NON-MILITARY SERVICE**

STATE OF PENNSYLVANIA:

: ss.

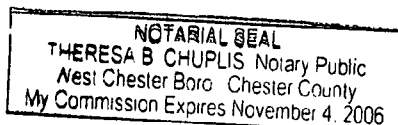
COUNTY OF CHESTER :

Paul J. Hennessy, Esquire, being duly sworn according to law, deposes and says that he represents the Plaintiff(s) in the above entitled case; that he is authorized to make this affidavit on behalf of the Plaintiff(s); and that the above named Defendant(s) is(are) unknown years of age; the address of Defendant(s) is PO Box 240, Woodland, PA 16881; occupation of Defendant(s) is unknown; and Defendant is not in the Military Service of the United States nor any State or Territory thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 and the amendments thereto.

  
Paul J. Hennessy, Esquire

Sworn to and subscribed  
before me this 11<sup>TH</sup> day  
of AUGUST, 2004.

  
Notary Public



(RULE OF CIVIL PROCEDURE NO. 236) - REVISED

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

NO: 03-1464-CD

Peerless Insurance Company  
A/S/O Patricia Martell  
**AND**  
Patricia Martell  
**vs.**  
William Goodrow

NOTICE IS GIVEN THAT A JUDGMENT IN THE ABOVE CAPTIONED MATTER  
HAS BEEN ENTERED AGAINST YOU.

8/13/04  
PROTHONOTARY

If you have any questions concerning the above, please contact:

Paul J. Hennessy, Esquire  
Attorney or Party Filing

142 West Market Street, Suite 2  
West Chester, PA 19382  
610-431-2727

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Peerless Insurance Company  
Patricia Martell  
Plaintiff(s)

No.: 2003-01464-CD

Real Debt: \$6,554.30

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

William Goodrow  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: August 13, 2004

Expires: August 13, 2009

Certified from the record this 13th day of August, 2004.

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

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney

DL-201 (12-93)  
Bureau of Driver Licensing  
P.O. Box 60037  
Harrisburg, PA 17106-0037

# CERTIFICATION OF MOTOR VEHICLE JUDGMENT

COURT INFORMATION	
COURT	CCP
COUNTY	Clearfield
NUMBER	03-1464-CD
YEAR	2003

## TO THE SECRETARY OF TRANSPORTATION

This is to certify that on August 13, 2004 a judgment for \$ 6,554.30 plus \$ 124.97  
was entered against the following: (AMOUNT) (COST)

(Please use a separate form for each)

## JUDGMENT DEBTOR

(Please Print or Type)

NAME			SEX	DATE OF BIRTH		
FIRST	MIDDLE	LAST		MONTH	DAY	YEAR
William		Goodrow	M	9	27	74
ADDRESS						
P.O. Box 240						
CITY		STATE	ZIP CODE	SOCIAL SECURITY NUMBER		
Woodland		PA	16881			
DRIVER NUMBER		STATE	DATE OF ACCIDENT	CLAIM NUMBER		
NONE		PA	September 24, 2002	OP206553Y		

☐ Check this block if defendant is a resident of another state

## JUDGMENT CREDITOR

Peerless Ins. Co. A/S/O Patricia Martell

(NAME)

c/o 142 West Market Street, Suite 2

(STREET ADDRESS)

West Chester, PA

(CITY & STATE)

19382

(ZIP)

610-431-2727

(TELEPHONE NUMBER)

## ATTORNEY FOR THE JUDGMENT CREDITOR (If applicable)

Paul J. Hennessy, Esquire

(NAME)

142 West Market Street, Suite 2

(STREET ADDRESS)

West Chester, PA

(CITY & STATE)

19382

(ZIP)

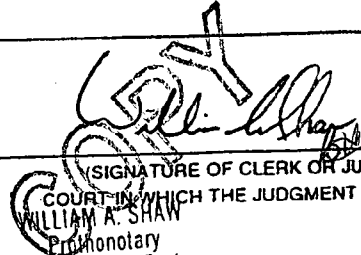
610-431-2727

(TELEPHONE NUMBER)

THE ABOVE MENTIONED JUDGMENT AROSE FROM A MOTOR VEHICLE ACCIDENT. SIXTY DAYS HAVE ELAPSED SINCE THE ENTRY OF SAID JUDGMENT, AND THE SAME HAS NOT BEEN SATISFIED OF RECORD AND NO APPEAL HAS BEEN TAKEN THEREFROM.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal  
of the court this Day of November 8 2004

SEAL

  
(SIGNATURE OF CLERK OR JUDGE OF THE  
COURT IN WHICH THE JUDGMENT WAS RENDERED)  
William A. Shaw  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA  
(TYPE OR PRINT NAME)