

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 : In The Court of Common Pleas
A/S/O Patricia Martell : Clearfield County, Pennsylvania
PO Box 8851 : Civil Action Law
Camp Hill, PA 17001-8851
AND
Patricia Martell
23781 Shawville Frenchville Highway : No: 03-14641-CJ
Frenchville, PA 16836

vs.

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

Praecipe to Issue Writ of Summons

Prothonotary:

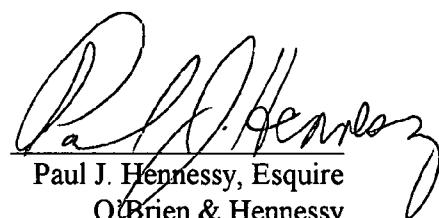
Kindly issue a Writ of Summons with regard to the above captioned case.

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

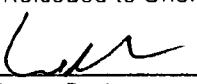
FILED 1cc Shff w/ Summons

012:16-BL
SEP 29 2003

William A. Shaw
Prothonotary/Clerk of Courts

Atty pd. 85.00

3Av. 30, 2004 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


Deputy Prothonotary

CCPY

**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**



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

21st Day Of Oct 2003
Will A. Shaw

So Answers,

My Manly Hand
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
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.

William Goodrow

: No: 03-1464-CD

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:

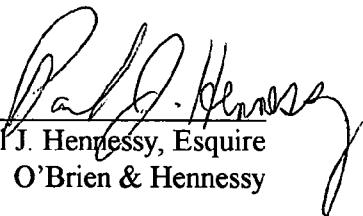
1. The civil Writ of Summons was filed on September 23, 2003, listing Defendant residing at RR #1, Box 506, Woodland, PA 16881.
2. Attempts were made to serve the Defendant on October 20, 2003 by Sheriff service.
3. Plaintiffs have confirmed the Defendant's address as PO Box 240, Woodland, PA 16881 via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

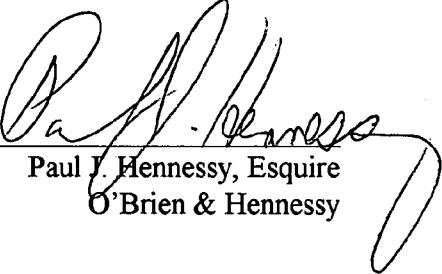
STATE OF PENNSYLVANIA:

: 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)

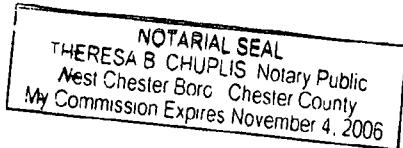


Paul J. Hennessy, Esquire
O'Brien & Hennessy

Sworn to and subscribed
before me this 7th 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

: In The Court of Common Pleas

AND
Patricia Martell

: Clearfield County, Pennsylvania

vs.

: Civil Action Law

William Goodrow

: No: 03-1464-CD

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

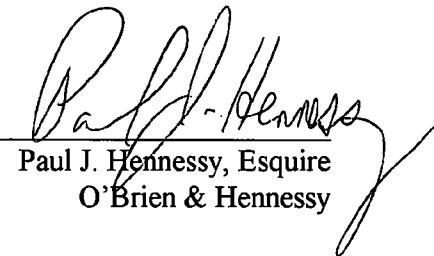
When Service cannot be made under the regular service methods, the Plaintiff under Pennsylvania Rules of Civil Procedure No. 430(a) may make a motion for special order directing an alternative or substitute method of service usually by mail. Such a motion must be accompanied by an affidavit stating the 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

Cap

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

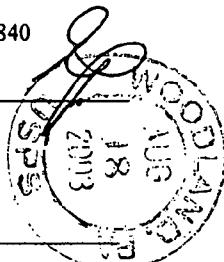
WARNING

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.

Thomas J. Black
Signature
THOMAS BLACK

PO BOX 286
METUCHEN, NJ 08840



FOR POST OFFICE USE ONLY

GOOD AS ADDRESSED

NEW ADDRESS

NOT KNOWN AT ADDRESS

MOVED LEFT NO FORWARDING ADDRESS

NO SUCH 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

31E

SHERIFF RETURNS

NOW OCTOBER 20, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE
WITHIN SUMMONS "NOT FOUND" AS TO WILLIAM GOODROW, DEFENDANT.
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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

So Answers,

____ Day Of _____ 2003



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

vs.

: No: 03-1464-CD

William Goodrow

ORDER

AND NOW, this 13th 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

Judie J. Zimmerman
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
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: In The Court of Common Pleas

: Clearfield County, Pennsylvania

: Civil Action Law

vs.

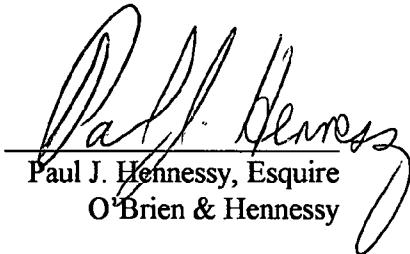
: No: 03-1464-CD

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/ 
William A. Shaw
Prothonotary/Clerk of Courts

I sent to App
w/ w/ w/ w/

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.

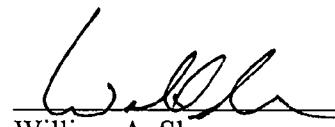
NO.: 2003-01464-CD

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

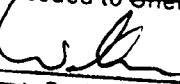


William A. Shaw
Prothonotary

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. Meholic, 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 páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia 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 tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, 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.

Lleve 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 teléfono a la oficina cuya dirección se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

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

5. On or about September 24, 2002 the defendant took the Plaintiff's vehicle without her permission from the Plaintiff's 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:

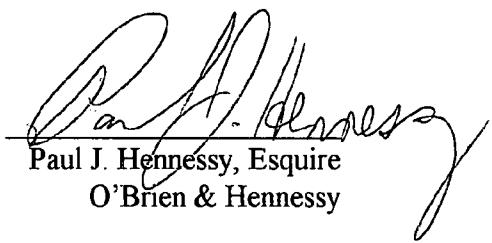
- a) Reckless and wanton disregard for Plaintiff's automobile;
- b) Failure to take proper safety precautions;
- c) Failing to warn Plaintiff;
- d) other such negligence that may be developed through continuing discovery and trial of this matter;

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 Plaintiff's.

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 :

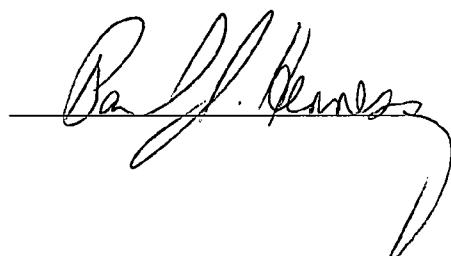
COUNTY OF CHESTER : ss

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



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
: Clearfield County, Pennsylvania
: Civil Action Law

vs.

: no: 03-1464-CD

William Goodrow

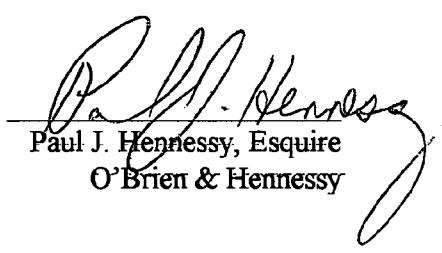
AFFIDAVIT OF SERVICE

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

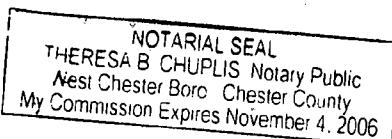
Sworn to and subscribed
before me this 20 day
of MARCH, 2004.


NOTARY PUBLIC

FILED

MAR 08 2004

William A. Shaw
Prothonotary/Clerk of Courts



4

9234 2644 0002 3150 7002

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

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 37	2-17-04
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 THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ 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. 		<p>A. Received by (Please Print Clearly) Patti Marten B. Date of Delivery 2-17-04</p> <p>C. Signature Patti Marten</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> If YES, enter delivery address below: WILLIAM GOODROW P.O. BOX 240 WOODLAND, PA 16881</p>	
<p>1. Article Addressed to:</p> <p>WILLIAM GOODROW P.O. BOX 240 WOODLAND, PA 16881</p>		<p>3. Service Type</p> <p><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.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Copy from service label) 7002 3150 0002 2644 9234</p>			

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

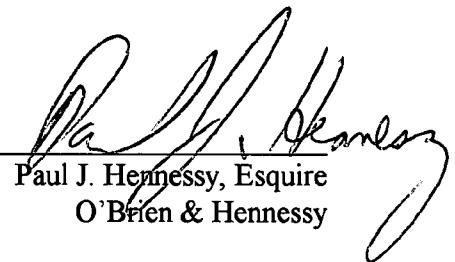
Peerless Insurance Company
A/S/O Patricia Martell
AND
Patricia Martell
vs.
William Goodrow

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

FILED *Encl*
10/3/04 4:40 PM to Def.
AUG 13 2004 Statement to
William A. Shaw
Prothonotary/Clerk of Courts

Atty
Atty pd 20.00

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

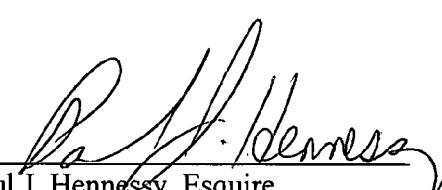
: In The Court of Common Pleas
: Clearfield County, Pennsylvania
: Civil Action Law
: No: 03-1464-CD

PRAECIPE FOR JUDGMENT

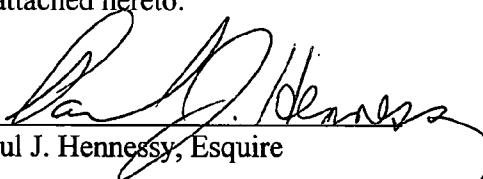
TO THE PROTHONOTARY:

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:

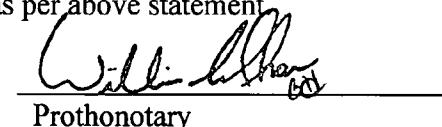
Real Debt: \$6,554.30


Paul J. Hennessy, Esquire

I hereby certify that written notice of the intention to file this Praeclipe 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 Praeclipe. 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.


William A. Shaw
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 Praeclipe 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. Meholic, 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 prueba 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. Meholic, 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

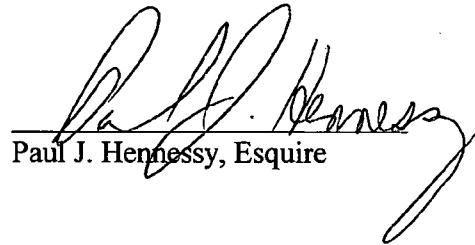
AFFIDAVIT OF NON-MILITARY SERVICE

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 11th day
of August, 2004.



Theresa B. Chuplis
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

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

COPY

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 (AMOUNT) plus \$ 124.97 (COST) was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME	MIDDLE	LAST	SEX	DATE OF BIRTH
FIRST William		Goodrow	M	MONTH 9 DAY 27 YEAR 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

**ATTORNEY FOR THE JUDGMENT
CREDITOR (If applicable)**

Paul J. Hennessy, Esquire

(NAME)

JUDGMENT CREDITOR
Peerless Ins. Co. A/S/O Patricia Martell
(NAME)

c/o 142 West Market Street, Suite 2

(STREET ADDRESS)

142 West Market Street, Suite 2

(STREET ADDRESS)

West Chester, PA

(CITY & STATE)

19382

19382

610-431-2727

(TELEPHONE NUMBER)

West Chester, PA

(CITY & STATE)

(ZIP)

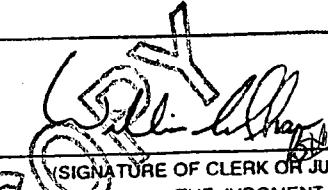
610-431-2727

(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


WILLIAM A. SHAW
Prothonotary

My Commission Expires

1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

(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