

03-1784-CD
KATHY L. BARRAGLOUGH, et al. vs. JESSIE T. CAMPBELL

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

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,

Plaintiffs,

2003-1784-cd

CIVIL ACTION - Law

vs.

No.: C.D. 2003

JESSIE I. CAMPBELL,

Type of Pleading:
COMPLAINT

Defendant.

Filed on behalf of: Plaintiffs

Counsel of Record for this
Party:

Joseph H. Ellermeyer, Esquire
Achille, Ellermeyer & French,
Attorneys at Law
379 Main Street
Brookville, PA 15825
814 849-6701
I.D. No. 43944

FILED

DEC 02 2003

011150/6

William A. Shaw

Prothonotary/Clerk of Courts

2 copies to Atty

KATHY L. BARRACLOUGH and : IN THE COURT OF COMMON PLEAS OF
JAMES BARRACLOUGH, : CLEARFIELD COUNTY, PENNSYLVANIA
her husband, :
Plaintiffs, :
vs. : CIVIL ACTION - Law
: No.: C.D. 2003
JESSIE I. CAMPBELL, :
Defendant. :
:

NOTICE

YOU have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering 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
230 East Market Street
Clearfield, PA 16830
(814) 765-2641

Keystone Legal Services
211½ East Locust Street
Clearfield, PA 16830
(800) 326-9177

KATHY L. BARRACLOUGH and : IN THE COURT OF COMMON PLEAS OF
JAMES BARRACLOUGH, : CLEARFIELD COUNTY, PENNSYLVANIA
her husband, :
Plaintiffs, :
vs. : CIVIL ACTION - Law
: No.: C.D. 2003
JESSIE I. CAMPBELL, :
Defendant. :
:

COMPLAINT

AND NOW come the Plaintiffs, by and through their attorney, Joseph H. Ellermeyer, Esquire, and file the following Complaint in Civil Action:

1. The Plaintiffs are Kathy L. Barraclough and James Barraclough, her husband, who are adult individuals residing in DuBois, Clearfield County, Pennsylvania.
2. The Defendant is Jessie I. Campbell, an individual whose last known address was Luthersburg, Clearfield County, Pennsylvania.
3. On December 17, 2001, at approximately 10:15 a.m. while traveling eastward on Parkway Drive in DuBois, Clearfield County, Pennsylvania, the Plaintiff Wife was involved in an automobile accident with a motor vehicle owned and operated by the Defendant.
4. On December 17, 2001, at approximately 10:15 a.m., the Plaintiff Wife was a passenger in a vehicle that was traversing the roadway in a safe and cautious manner proceeding into an intersection under a green light from Parkway Drive onto Liberty Boulevard within the City of DuBois, Clearfield County, Pennsylvania.

5. On December 17, 2001, at approximately 10:15 a.m., the Defendant was traveling south on Liberty Boulevard in DuBois, Clearfield County, failed to stop at a red stop light and entered the intersection of Liberty Boulevard and Parkway Drive striking the vehicle in which the Plaintiff Wife was a passenger causing the Plaintiff Wife, Kathy L. Barraclough, to sustain injuries to various parts of her body.

6. The impact of the collision caused substantial damage to the motor vehicle in which the Plaintiff Wife was a passenger and threw her about within the motor vehicle .

7. At all times relevant to this incident, the Plaintiff Wife acted without negligence and conformity with all of the laws and regulations applicable to the circumstances.

8. As a proximate result of the aforesaid collision, the Plaintiff Wife sustained severe bodily injuries, some of which may be permanent in nature, which include but are not limited to the following:

- (a) Acute lumbar strain and sprain with muscle spasms;
- (b) Left knee pain including contusions and strain to the anterior cruciate ligament;
- (c) Contusion to the right hip causing sciatic irritation;
- (d) Right greater trochanteric bursitis;
- (e) Low and mid back pain;
- (f) Neck pain;
- (g) Headaches;

- (h) Right hip pain; and
- (i) Pain in her chest and sternum.

9. As a result of said injuries and the negligence, carelessness, recklessness or breaches of care of the Defendant, the Plaintiff Wife has suffered and may continue to suffer physical pain, mental anguish, inconvenience, loss of life's pleasures, and inability to continue her usual activities.

10. As a result of said injuries and the negligence, carelessness, recklessness or breaches of care of the Defendant, the Plaintiff Wife has suffered and may continue to suffer shock and injury to her nervous systems and may continue to suffer emotional distress.

11. As a result of said injuries and the negligence, carelessness, recklessness or breaches of care of the Defendant, the Plaintiff Wife has been and may be compelled to spend money for medical aid, medicines and the like.

12. As a result of said injuries and the negligence, carelessness, recklessness or breaches of care of the Defendant, the earning power of the Plaintiff Wife has been or may be greatly reduced, diminished. Furthermore, the Plaintiff Wife has been and may in the future be disabled and may be prevented from following her usual occupation and performing her customary duties.

13. The Plaintiff Wife alleges that the negligence, carelessness, recklessness or breaches of care of the Defendant which either jointly or

severely proximately caused the injuries and damages sustained by the Plaintiff Wife consisted of, but were not limited to the following:

- (a) failing to operate the Defendant's motor vehicle in compliance with the Laws of the Commonwealth of Pennsylvania;
- (b) running a red light;
- (c) failing to adhere to a traffic control device;
- (d) failing to operate the vehicle at a speed which was reasonable and prudent under the conditions and having regard for the actual and potential hazards then and there existing;
- (e) failing to be attentive and to properly observe the roadway conditions immediately ahead of the Defendant's vehicle;
- (f) failing to properly maintain the Defendant's vehicle;
- (g) exhibiting a reckless and wanton disregard towards the rights and safety of the Plaintiff Wife herein and otherwise failing to exercise due care under the circumstances;
- (h) operating the vehicle at a high, dangerous and reckless speed under the circumstances so as to constitute reckless driving;
- (i) failing to have the Defendant's vehicle under proper control;
- (j) careless driving;
- (k) continuing to operate the Defendant's vehicle in a direction toward the Plaintiff's vehicle when the Defendant saw or in the exercise of reasonable diligence should have seen that further operation in that

direction would result in striking the vehicle in which the Plaintiff Wife was a passenger;

(I) failing to sound a horn or give other warning of the approach of the Defendant's vehicle; and

(I) such other acts or omissions which constitute negligence, recklessness, or breaches of care which may become apparent during discovery or at the time of trial.

WHEREFORE, the Plaintiffs demands that Judgment be entered in their favor against the Defendant for compensatory damages in excess of Twenty-five Thousand (\$25,000.00) Dollars plus interest, costs, and such other relief as the Court may deem appropriate.

COUNT II

James Barraclough v Jessie I. Campbell
LOSS OF CONSORTIUM

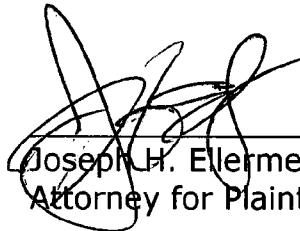
14. The Plaintiff, James Barraclough, hereby incorporates by reference the foregoing paragraphs as if set forth fully herein.

15. As a result of the aforementioned accident, the negligence, carelessness, recklessness or breaches of care of the Defendant and the injuries proximately suffered by Kathy L. Barraclough, his wife, the Plaintiff Husband has suffered loss of consortium.

WHEREFORE, the Plaintiff, James Barraclough, requests that Judgment be entered in his favor against the Defendant for an amount in excess of

Twenty-five Thousand (\$25,000) Dollars along with such other relief as the Court may deem appropriate.

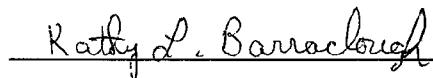
Respectfully submitted,



Joseph H. Ellermeyer
Attorney for Plaintiff

VERIFICATION

I, Kathy L. Barraclough, hereby state that I am the Plaintiff in this action and verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief. I understand that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.



Dated:

11-20-03

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

**KATHY L. BARRACLOUGH, and
JAMES BARRACLOUGH, her husband,
Plaintiffs,**

vs.

**JESSIE I. CAMPBELL,
Defendant.**

CIVIL ACTION - LAW

Number 2003 - 1784 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Defendant

Counsel of Record for this Party:

**Troy J. Harper
Supreme Court Number: 74753**

**John C. Dennison, II
Supreme Court Number: 29408**

**DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316**

FILED

JAN 15 2004

**William A. Shaw
Prothonotary/Clerk of Courts**

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,
Plaintiffs,

vs.

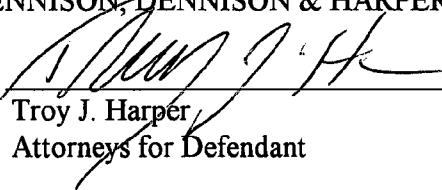
JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
* Number 2003 - 1784 C.D.

APPEARANCE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please enter our Appearance on behalf of the Defendant, JESSIE I. CAMPBELL, in
regard to the above entitled matter.

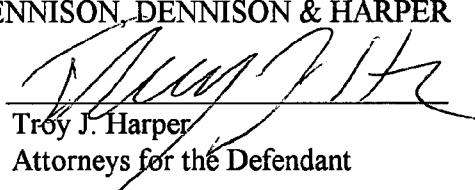
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

Dated: 1/14/04

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Appearance was served on the
14th day of January, 2004, by United States Mail, First Class,
Postage Prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, Pennsylvania 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

FILED NO CC
M 11:2004 C
JAN 15 2004
William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

BARRACLOUGH, KATHY L. & JAMES

VS.

CAMPBELL, JESSIE I.

COMPLAINT

Sheriff Docket # 14892

03-1784-CD

SHERIFF RETURNS

NOW DECEMBER 30, 2003 AT 10:53 AM SERVED THE WITHIN COMPLAINT ON JESSIE I. CAMPBELL, DEFENDANT AT RESIDENCE, RT 219, PO BOX 44, LUTHERSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSIE I. CAMPBELL A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO JESSIE I. CAMPBELL THE CONTENTS THEREOF.

SERVED BY: MCCLEARY

Return Costs

Cost	Description
30.61	SHERIFF HAWKINS PAID BY: ATTY CK# 5507
10.00	SURCHARGE PAID BY: ATTY CK# 5508

Sworn to Before Me This

12th Day Of Feb. 2004
William A. Shaw

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

So Answers,

*Chester A. Hawkins
by Marilyn Hays*
Chester A. Hawkins
Sheriff

FILED
01/30/04
FEB 12 2004

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH, and
JAMES BARRACLOUGH, her husband,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 1784 C.D.

Type of Case: Civil Division

Type of Pleading: Answer and
New Matter

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MAY 03 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
*
* Number 2003 - 1784 C.D.

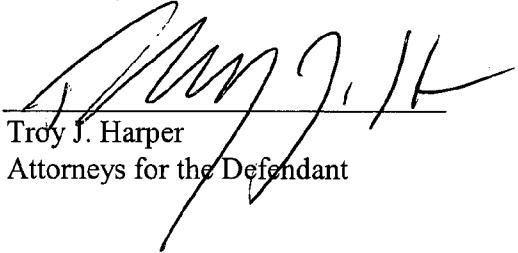
NOTICE TO PLEAD

**TO: KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, Plaintiffs:**

You are hereby notified to plead to the within New Matter within twenty (20) days from service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
*
* Number 2003 - 1784 C.D.

ANSWER AND NEW MATTER

AND NOW, comes the Defendant, JESSIE I. CAMPBELL, by and through her attorneys, Dennison, Dennison & Harper, who file the following Answer and New Matter in response to the Plaintiffs' Complaint:

1. After reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 1 of the Plaintiffs' Complaint, and said averments are therefore denied.
2. Admitted.
3. The averments of Paragraph 3 of the Plaintiffs' Complaint are admitted insofar as on or about December 17, 2001, the Defendant was the owner and operator of a vehicle which was involved in an accident with a vehicle in which the Plaintiff wife was a passenger. The remaining averments of Paragraph 3 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).
4. The averments of Paragraph 4 of the Plaintiffs' Complaint are admitted only insofar as the Plaintiff wife was a passenger in a vehicle. The remaining averments of Paragraph 4 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).

5. The averments of Paragraph 5 of the Plaintiffs' Complaint are admitted insofar as on or about December 17, 2001, the Defendant was the operator of a vehicle which was traveling in a southerly direction on Liberty Boulevard in DuBois, Clearfield County, Pennsylvania, which was involved in an accident with a vehicle in which the Plaintiff wife was a passenger. The remaining averments of Paragraph 5 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).

6. The averments of Paragraph 6 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).

7. The averments of Paragraph 7 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).

8. After reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 8 of the Plaintiffs' Complaint and subparagraphs (a) through (i) thereof, and said averments are therefore denied.

9. The averments of Paragraph 9 of the Plaintiffs' Complaint alleging any negligence, carelessness, recklessness or breaches of care on the part of the Defendant are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 9 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

10. The averments of Paragraph 10 of the Plaintiffs' Complaint alleging any negligence, carelessness, recklessness or breaches of care on the part of the Defendant are denied pursuant to

Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 10 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

11. The averments of Paragraph 11 of the Plaintiffs' Complaint alleging any negligence, carelessness, recklessness or breaches of care on the part of the Defendant are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 11 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

12. The averments of Paragraph 12 of the Plaintiffs' Complaint alleging any negligence, carelessness, recklessness or breaches of care on the part of the Defendant are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 12 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

13. With respect to the averments of Paragraph 13 of the Plaintiffs' Complaint alleging any injuries and damages, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied. The remaining averments of Paragraph 13 of the

Plaintiffs' Complaint and subparagraphs (a) through (l) thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

WHEREFORE, the Defendant, Jessie I. Campbell, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

COUNT II
James Barraclough v. Jessie I. Campbell
LOSS OF CONSORTIUM

14. Paragraph 14 of the Plaintiffs' Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 13 of this Answer are incorporated herein by reference thereto.

15. The averments of Paragraph 15 of the Plaintiffs' Complaint alleging any negligence, carelessness, recklessness or breaches of care on the part of the Defendant are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 15 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, Jessie I. Campbell, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

WHEREFORE, the Defendant, Jessie I. Campbell, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

NEW MATTER

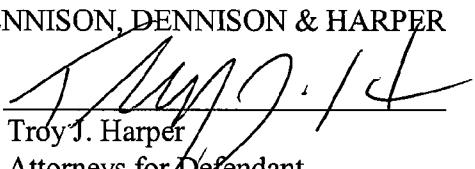
16. The terms and conditions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., are hereby incorporated herein by reference thereto as fully as the same bar and/or diminish any claim or cause of action of the Plaintiff.

17. At the time of the incident complained of in the Plaintiffs' Complaint, and at all times material hereto, it is believed and therefore averred that the Plaintiff, Kathy L. Barraclough, was insured under an automobile insurance policy issued pursuant to the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., and was subject to the limited tort option under said policy.

18. The Plaintiff, Kathy L. Barraclough, did not sustain serious injuries, as defined by the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., as a result of the incident described in the Plaintiffs' Complaint and, therefore, the Plaintiffs are not entitled to recover any noneconomic damages.

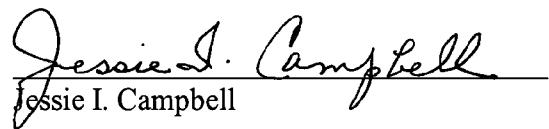
19. The Plaintiffs have failed to state a cause of action upon which relief may be granted.

WHEREFORE, the Defendant, Jessie I. Campbell, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

VERIFICATION

I verify that the averments made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.



Jessie I. Campbell

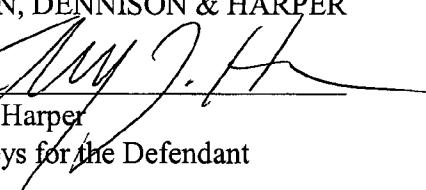
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer and New Matter was served on the 29th day of April, 2004, by United States Mail, First Class, Postage Prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, Pennsylvania 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant

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

KATHY L. BARRACLOUGH and :
JAMES BARRACLOUGH, her husband, :
Plaintiffs, :
vs. : CIVIL ACTION - Law
JESSIE I. CAMPBELL, : No.: 1784 C.D. 2003
Defendant. : Type of Pleading:
 : REPLY TO NEW MATTER
 : Filed on behalf of: Plaintiffs
 : Counsel of Record for this
 : Party:
 : Joseph H. Ellermeyer, Esquire
 : Achille, Ellermeyer & French,
 : Attorneys at Law
 : 379 Main Street
 : Brookville, PA 15825
 : 814 849-6701
 : I.D. No. 43944

FILED

MAY 25 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and : IN THE COURT OF COMMON PLEAS OF
JAMES BARRACLOUGH, : CLEARFIELD COUNTY, PENNSYLVANIA
her husband, :
Plaintiffs, :
: CIVIL ACTION - Law
vs. : No.: 1784 C.D. 2003
: JESSIE I. CAMPBELL, :
: Defendant. :
:

REPLY TO NEW MATTER

AND NOW come the Plaintiffs, by and through their attorney, Joseph H. Ellermeyer, Esquire, and file the following Reply to the Defendant's New Matter:

16. Denied. At the time of the accident described in the Plaintiffs' Complaint, the Plaintiff Wife was a passenger in a commercial vehicle which is an exception to the Defendant's allegation.

17. Denied. The Plaintiffs had an automobile policy in effect at the time of this accident which clearly provided a full tort option selection for the Plaintiffs.

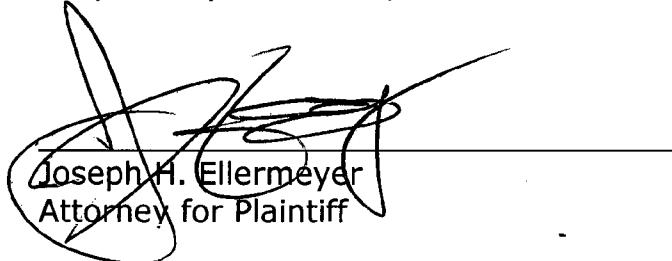
18. Denied. At the time of the accident, the Claimant was covered by Workers Compensation Act as she was in the course of her employment rather than the Pennsylvania Motor Vehicle Financial Responsibility Law.

19. Denied. The Plaintiff incorporate herein by reference thereto all of the paragraphs of their Complaint.

WHEREFORE, the Plaintiffs demands that Judgment be entered in their favor against the Defendant for compensatory damages in excess of Twenty-

five Thousand (\$25,000.00) Dollars plus interest, costs, and such other relief as the Court may deem appropriate.

Respectfully submitted,



Joseph H. Ellermeyer
Attorney for Plaintiff

VERIFICATION

I, Kathy L. Barraclough, hereby state that I am the Plaintiff in this action and verify that the statements made in the foregoing Reply to New Matter are true and correct to the best of my knowledge, information, and belief. I understand that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Kathy Barraclough

Dated:

5-17-04

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m 11 23 64
OCT 21 2004
cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Dela Torre Medical Clinic, 231 Highland Street, Sykesville,
PA 15865 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)
Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

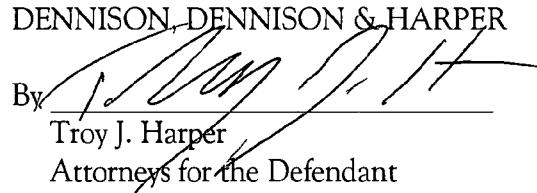
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *ECK*
NO *CC*
11-2384
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Dr. P. Joseph Valigorsley, II, Pain Clinic, P. O. Box 447, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:
See attached

(Address)
Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



WILLIAM A. SHAW

Deputy

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

DATE: Wednesday, September 29, 2004
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 26th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

EGK
FILED NO CC
m 11.23.04
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

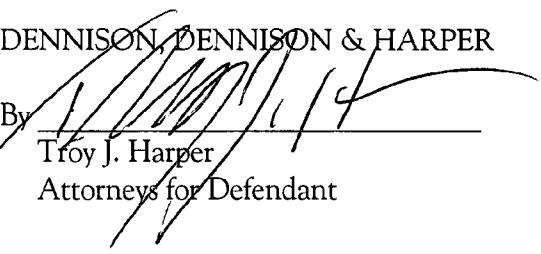
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Dr. Alexander Krot, 145 Hospital Avenue, Suite 300, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

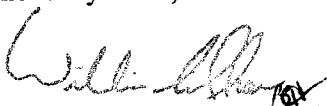
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

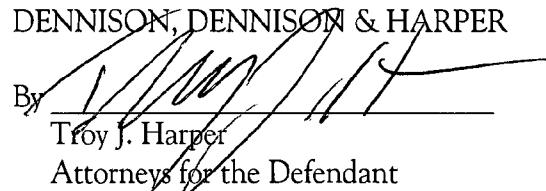
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

EBK
FILED NO
10-23-04
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

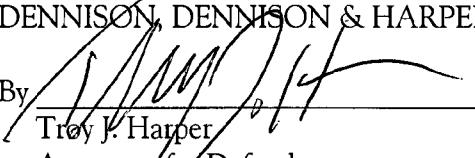
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, University Orthopedics Center, 101 Regent Court,
State College, PA 16801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)
Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

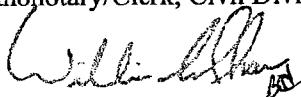
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

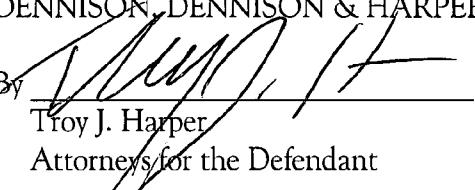
DATE: Wednesday, September 29, 2004
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ^{E6K}
mli:23801 NO cc
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

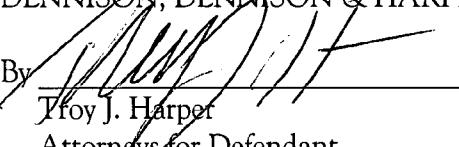
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

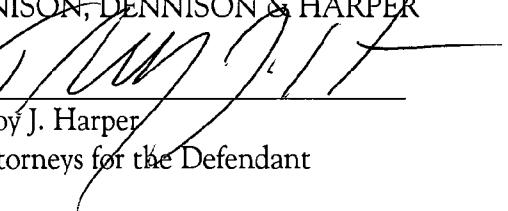
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

E 6K
FILED NO CC
OCT 23 2004
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Richard Snyder, D.C., 306 Main Street, Brookville, PA 15825
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

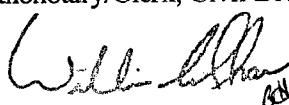
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

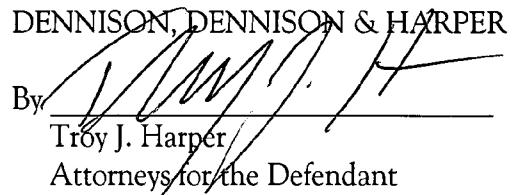
Seal of the Court

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

864
FILED NO CC
m 11:23 AM
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

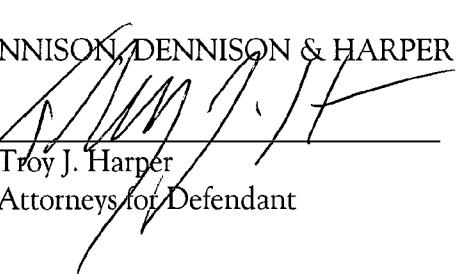
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

*

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, DuBois Regional Medical Center, 145 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

Dennison, Dennison & Harper, 293 ^(Address) Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

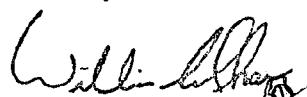
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

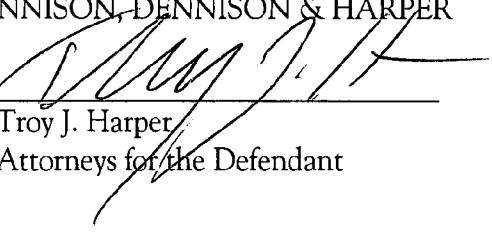
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

864
FILED NO
10/23/04
OCT 21 2004

William A. Shaw
Prothonotary, Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

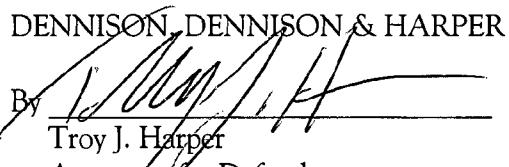
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, P & G Physical Therapy, 602-1 West DuBois Avenue, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

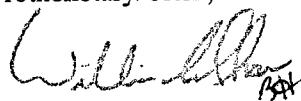
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

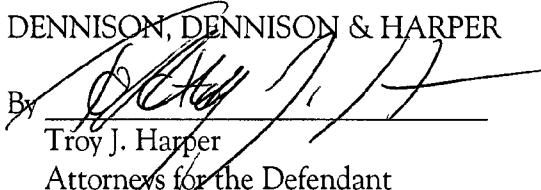
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

EGK
NO CC
M 11.23.04
OCT 21 2004

William A. Shaw
Prothonotary, Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

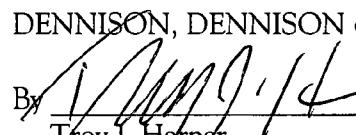
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co. Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

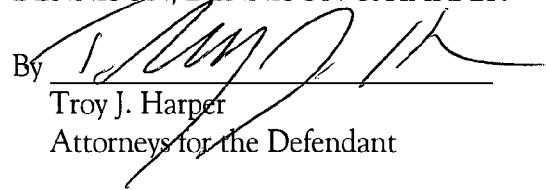
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m 11/23/04
OCT 21 2004
E6K
NO CC
William A. St. John
Prothonotary, Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

- * In the Court of Common Pleas of
- * Clearfield County, Pennsylvania
- *
- *
- *
- * Civil Action - Law
- *
- *
- *
- * Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

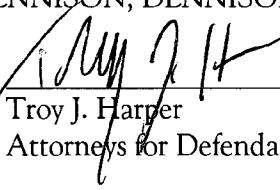
TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Outpatient Physical Therapy, DuBois Regional Medical Center, 145 Hospital Avenue, DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

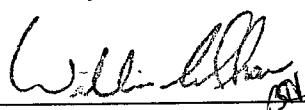
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

EGK
FILED NO CC
m11.23.04
OCT 21 2004

William A. Sraw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

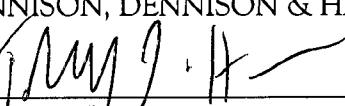
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

DENNISON, DENNISON & HARPER

Dated: October 19, 2004

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, School Claims Service, LLC, Workman's Compensation Division,
P. O. Box 67073, (Name of Person or Entity)
Harrisburg, PA 17106

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

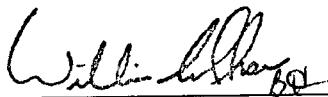
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004

Seal of the Court

Complete copies of any and all worker's compensation claim files for the claimant, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, for a loss occurring on December 17, 2001, including but not limited to all documents, correspondences, payment logs, wag logs, wage verifications, medical records, independent medical examination reports, record reviews, photographs, recorded statements, claim forms, benefit requests, loss notices, status reports and claim logs, including all electronic entries.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20 day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

607
FILED NO
m 11/23/04 cc
OCT 21 2004

William A. Shaffer,
Prothonotary, Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

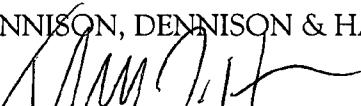
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 2910, Hartford,
CT 06104 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about October 3, 2003, involving your insured, Kathy Barracough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA0001222291.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

E6K
FILED NO
OCT 23 2004
OCT 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

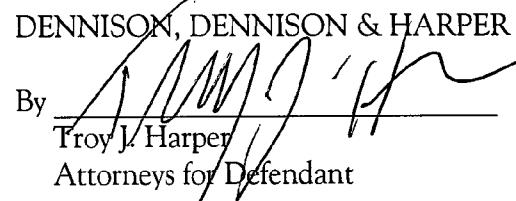
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

*

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 68941,
Indianapolis, IN 46268 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

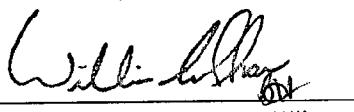
WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA



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

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about December 17, 2001, involving your insured, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA000565140.

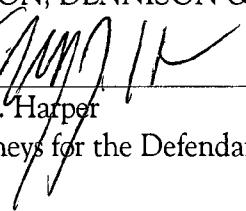
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 1784 - 2003 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

86K
FILED
m 11/14/04
OCT 20 2004
no cc

William A. Shaw
Prothonotary Clerk of Courts

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

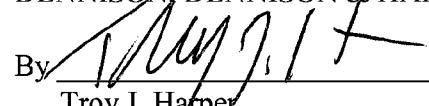
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 1784 - 2003 C.D.

CERTIFICATE OF SERVICE

I certify that an original and two certified copies of the First Set of Interrogatories
Directed to the Plaintiffs and an original and two certified copies of the First Set of Request for
Production of Documents Directed to the Plaintiffs was served on the 19th day of October,
2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esquire
ACHILLE, ELLERMEYER & FRENCH
293 Main Street
Brookville, PA 15825

DENNISON DENNISON & HARPER

By 

Troy J. Harper
Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

②
FILED *MoCc*
m10:47
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

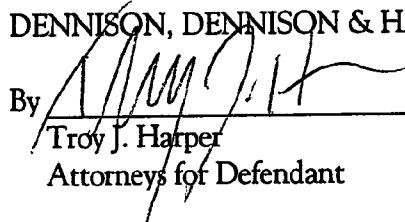
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 2910, Hartford,
CT 06104 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

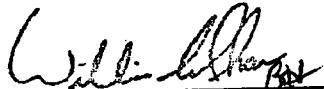
TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004

Seal of the Court

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about October 3, 2003, involving your insured, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA0001222291.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

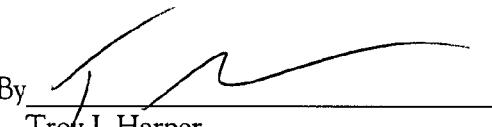
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

2

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

RE
FILED 10/23/04
m10.4784
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

* Number 2003 - 01784 C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

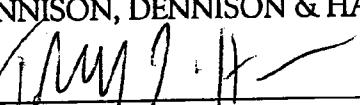
TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough
James Barracough
Plaintiff(s)

vs.

*
*
*
No. 2003-01784-CD

Jessie I. Campbell
Defendant(s)

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

TO: Records Custodian, School Claims Service, LLC, Workman's Compensation Division,
P. O. Box 67073, (Name of Person or Entity)
Harrisburg, PA 17106

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004
Seal of the Court

Deputy

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



Complete copies of any and all worker's compensation claim files for the claimant, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, for a loss occurring on December 17, 2001, including but not limited to all documents, correspondences, payment logs, wag logs, wage verifications, medical records, independent medical examination reports, record reviews, photographs, recorded statements, claim forms, benefit requests, loss notices, status reports and claim logs, including all electronic entries.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20 day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

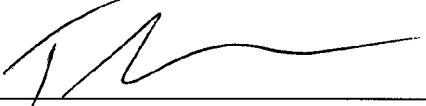
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FCW

FILED NO
M 10:47 AM
DEC 23 2004
cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

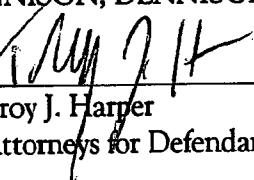
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

DENNISON, DENNISON & HARPER

Dated: October 19, 2004

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Outpatient Physical Therapy, DuBois Regional Medical Center, 145 Hospital Avenue, DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

4
FILED No
M 10:47 AM cc
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

- * In the Court of Common Pleas of
- * Clearfield County, Pennsylvania
- *
- *
- * Civil Action - Law
- *
- *
- *
- * Number 2003 - 01784 - CD

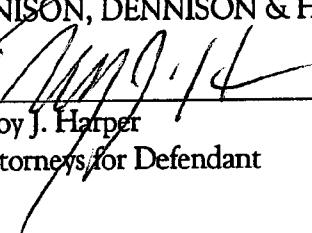
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: October 19, 2004

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

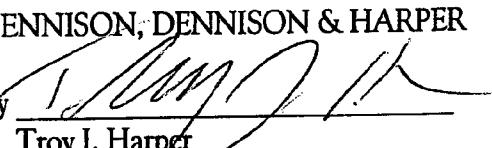

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co. Clearfield PA

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO
M 10:47 AM
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

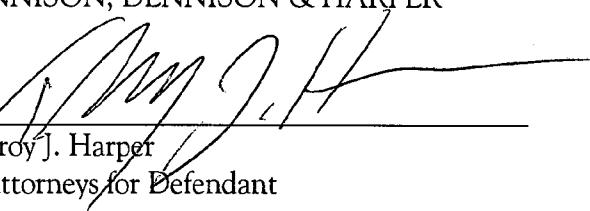
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

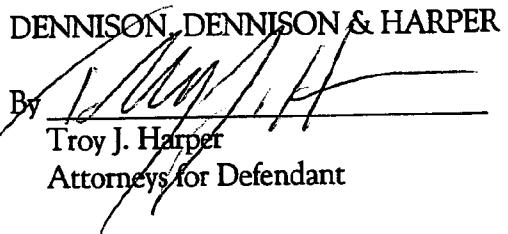
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, P & G Physical Therapy, 602-1 West DuBois Avenue, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

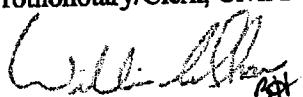
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004

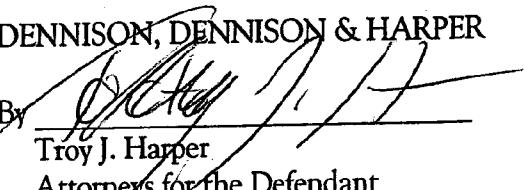
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M 10/4/04
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

*

* Number 2003 - 01784 C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

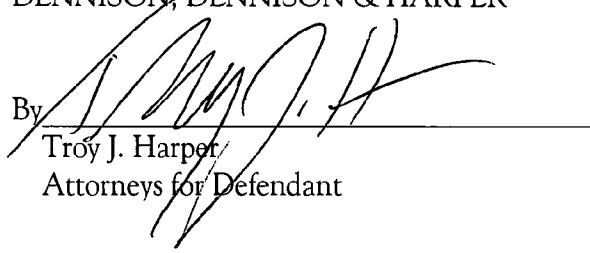
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

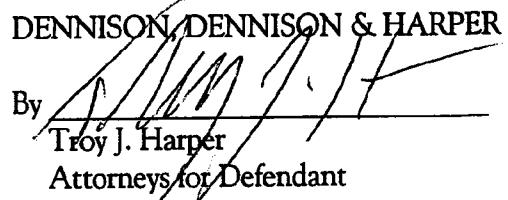
- * In the Court of Common Pleas of
- * Clearfield County, Pennsylvania
- *
- *
- * Civil Action - Law
- *
- *
- *
- * Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, DuBois Regional Medical Center, 145 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

Dennison, Dennison & Harper, 293^(Address) Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

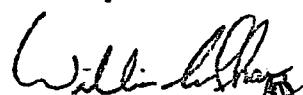
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

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

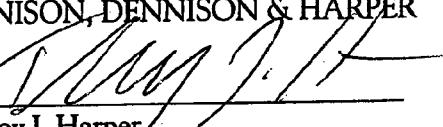
DATE: Wednesday, September 29, 2004
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

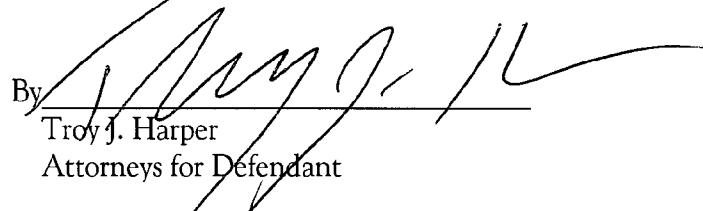
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

7

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
NOV 10 2004
cc
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

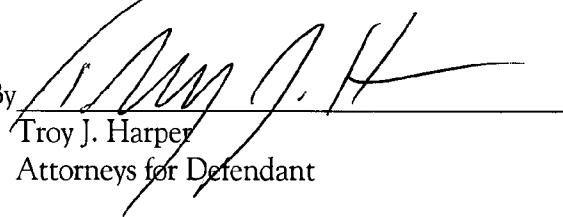
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

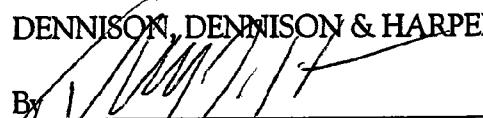
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Richard Snyder, D.C., 306 Main Street, Brookville, PA 15825
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

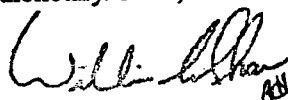
TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004

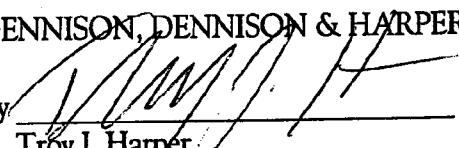
Seal of the Court

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Kathy Barracough, DOB: 10/10/1953, SSN: 160-48-3650.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

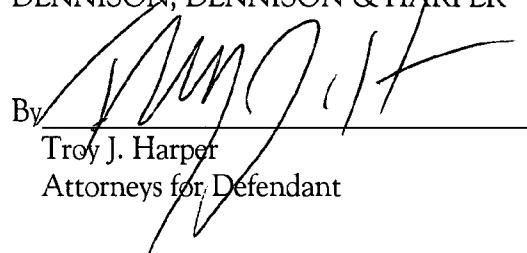
Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *in cc*
m/10/4764
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

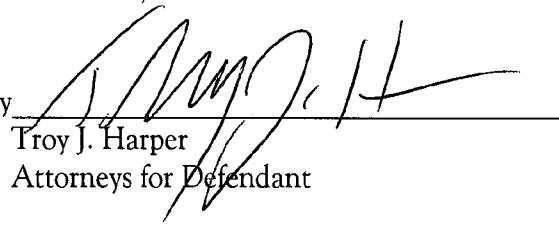
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

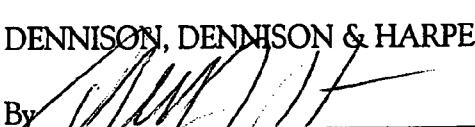
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

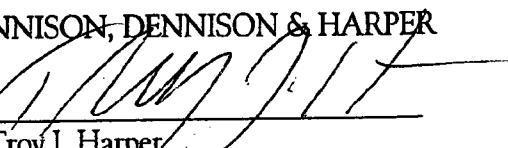
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

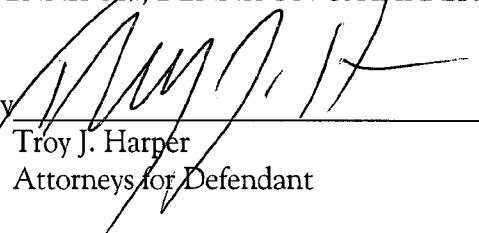
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

9

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

10
FILED
M 10:47 AM
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

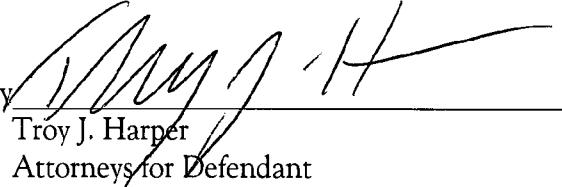
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

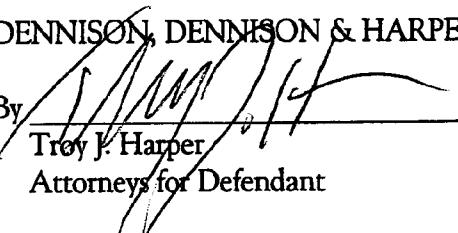
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, University Orthopedics Center, 101 Regent Court,
State College, PA 16801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

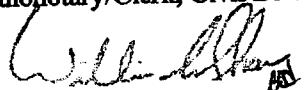
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

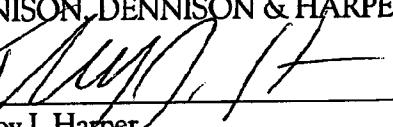
WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield, PA

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

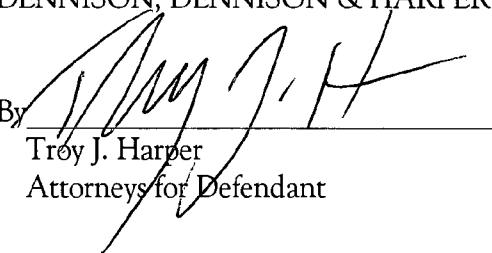
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

10
FILED
NO CC
M 10:47 AM
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

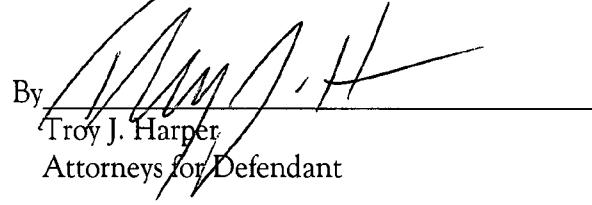
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

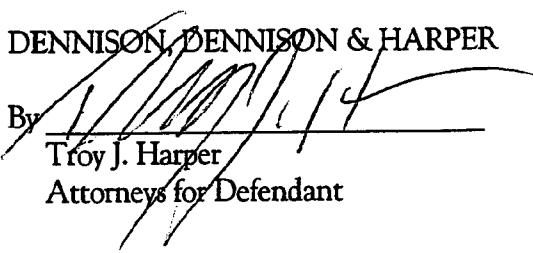
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Dr. Alexander Krot, 145 Hospital Avenue, Suite 300, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

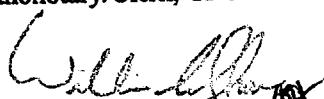
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

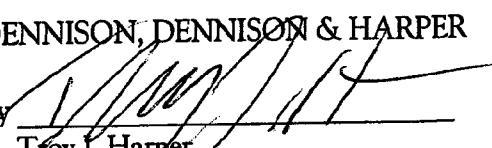
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

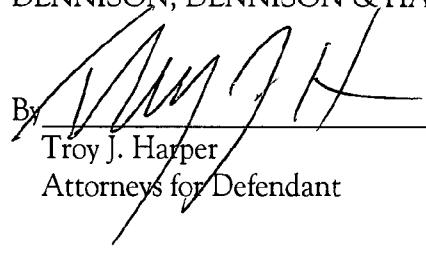
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

11

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

RE
FILED NO
m/cd:4784 cc
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

*

* Number 2003 - 01784 C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

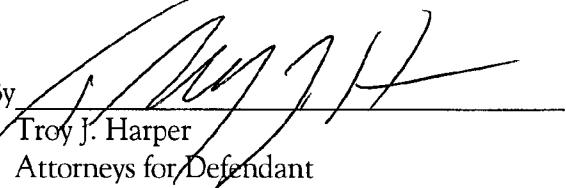
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Dr. P. Joseph Valigorsley, II, Pain Clinic, P. O. Box 447, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

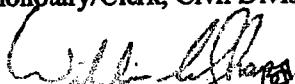
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

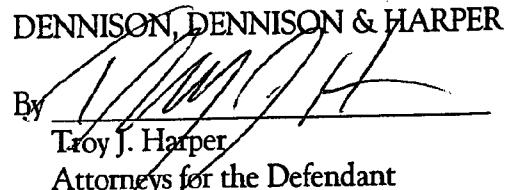
Deputy

Any and all medical records in your possession for Kathy Barracough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

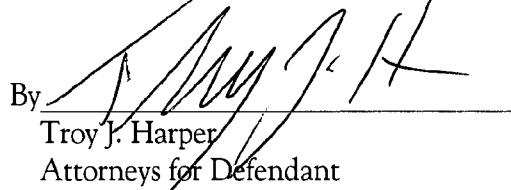
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(2)

FILED ^{no}
10:47 AM
DEC 23 2004
cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

VS.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

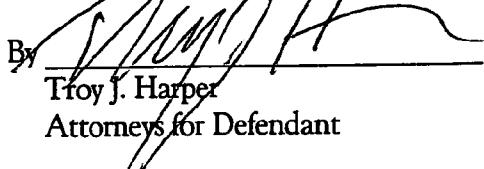
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
* Number 2003 - 01784 - CD

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Dela Torre Medical Clinic, 231 Highland Street, Sykesville,
PA 15865 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825 (Address)

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

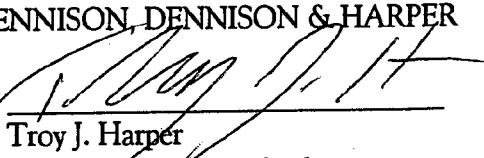
Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for the Defendant

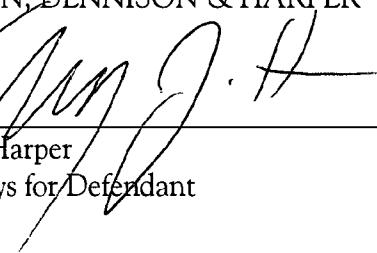
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *W*
NOV 10 2004
DEC 23 2004
cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

VS.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

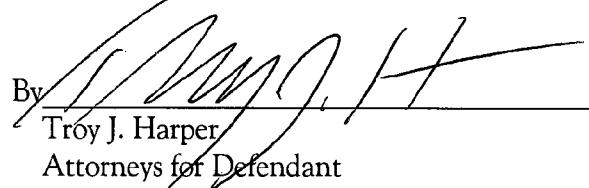
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Jessie I. Campbell, through her counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: December 22, 2004

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784- CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action - Law
*
*
* Number 2003 - 01784 - CD

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21

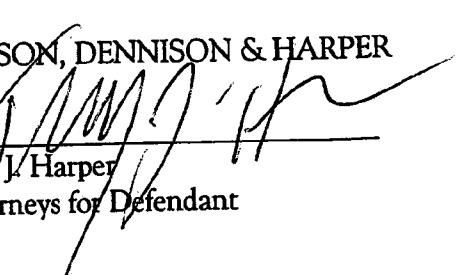
TO : KATHY L. BARRACLOUGH

Jessie I. Campbell, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: October 19, 2004

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barracough

James Barracough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 68941,
Indianapolis, IN 46268 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

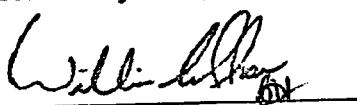
William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

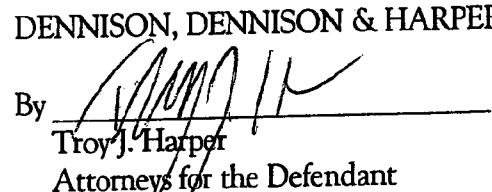


Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about December 17, 2001, involving your insured, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA000565140.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 20th day of October, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

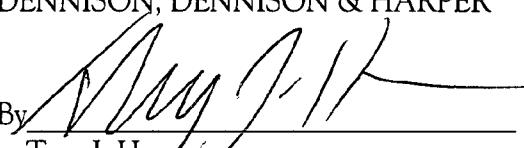
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *10:47 AM* NO
m/10/4/2004 CC
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Outpatient Physical Therapy
DuBois Regional Medical Center
145 Hospital Avenue
DuBois, PA 15801

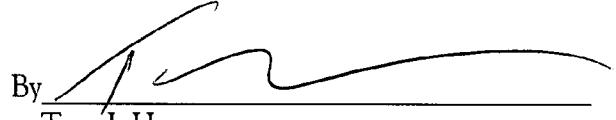
PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of Outpatient Physical Therapy, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Outpatient Physical Therapy, DuBois Regional Medical Center, 145 Hospital Avenue, DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

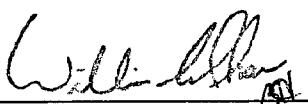
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Outpatient Physical Therapy
DuBois Regional Medical Center
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
NOV 10 2004
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Richard Snyder, D.C.
306 Main Street
Brookville, PA 15825

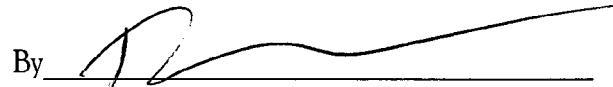
PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of Richard Snyder, D.C., twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING
IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT**

CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

*

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

TO: Richard Snyder, D.C., 306 Main Street, Brookville, PA 15825
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Kathy Barracough, DOB: 10/10/1953, SSN: 160-48-3650.

CERTIFICATE OF SERVICE

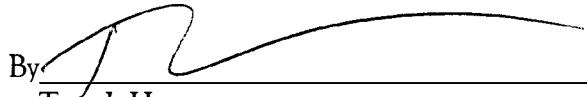
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Richard Snyder, D.C.
306 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

12
FILED 10
M 10:47 AM CC
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Alexander Krot
145 Hospital Avenue
Suite 300
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of Dr. Alexander Krot, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

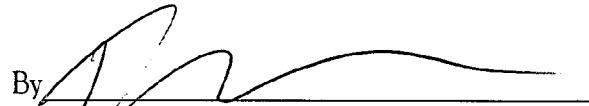
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Dr. Alexander Krot, 145 Hospital Avenue, Suite 300, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Alexander Krot
145 Hospital Avenue
Suite 300
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

rw
FILED
m104704
DEC 23 2004
atb cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

*

*

*

*

* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. P. Joseph Valigorsley, II
Pain Clinic
P. O. Box 447
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of Dr. P. Joseph Valigorsley, II, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Dr. P. Joseph Valigorsley, II, Pain Clinic, P. O. Box 447, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

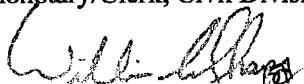
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



WILLIAM A. SHAW

Deputy

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

DATE: Wednesday, September 29, 2004
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Dr. P. Joseph Valigorsley, II
Pain Clinic
P. O. Box 447
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIAKATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

vs.

Type of Case: Civil Division

JESSIE I. CAMPBELL,
Defendant.Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-831615
FILED NO
M 10:47 AM
DEC 23 2004William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Hartford Financial Services
P. O. Box 68941
Indianapolis, IN 46268

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of Hartford Financial Services, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 68941,
Indianapolis, IN 46268 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004
Seal of the Court


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

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about December 17, 2001, involving your insured, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA000565140.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Hartford Financial Services
P. O. Box 68941
Indianapolis, IN 46268

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

②
FILED NO CC
M 10 4701
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

VS.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
Hartford Financial Services
P. O. Box 2910
Hartford, CT 06104

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of Hartford Financial Services, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, Hartford Financial Services, P. O. Box 2910, Hartford,
CT 06104 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)
Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

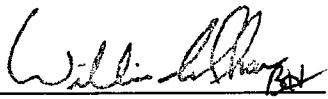
BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy


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

Complete copies of any and all documents contained in all claims files, first party benefits files, subrogation files, and/or investigative files, including but not limited to all records, reports, memos, index reports, claim activity logs, reports, medical records, color photographs, recorded statements, payment logs, investigative materials and all correspondences for an accident that occurred on or about October 3, 2003, involving your insured, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, believed to be assigned with Claim Number PA0001222291.

CERTIFICATE OF SERVICE

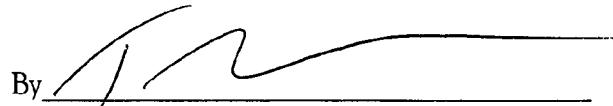
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Hartford Financial Services
P. O. Box 2910
Hartford, CT 06104

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(62)
FILED NO CC
M10:478N
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
School Claims Service, LLC
Workman's Compensation Division
P. O. Box 67073
Harrisburg, PA 17106

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of School Claims Service, LLC, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, School Claims Service, LLC, Workman's Compensation Division,
P. O. Box 67073, Harrisburg, PA 17106 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004
Seal of the Court

Deputy

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

Complete copies of any and all worker's compensation claim files for the claimant, Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, for a loss occurring on December 17, 2001, including but not limited to all documents, correspondences, payment logs, wag logs, wage verifications, medical records, independent medical examination reports, record reviews, photographs, recorded statements, claim forms, benefit requests, loss notices, status reports and claim logs, including all electronic entries.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
School Claims Service, LLC
Workman's Compensation Division
P. O. Box 67073
Harrisburg, PA 17106

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant

21

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(initials)

FILED *no cc*
M/10/4/04
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
University Orthopedics Center
101 Regent Court
State College, PA 16801

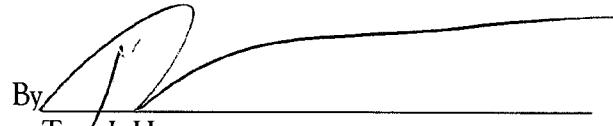
PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of University Orthopedics Center, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, University Orthopedics Center, 101 Regent Court,
State College, PA 16801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

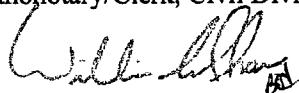
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

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

DATE: Wednesday, September 29, 2004
Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
University Orthopedics Center
101 Regent Court
State College, PA 16801

DENNISON, DENNISON & HARPER

By _____
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(2)
FILED NO
M 16 47201
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

VS.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Keystone Rehabilitation Systems
470 Jeffers Street
DuBois, PA 15801

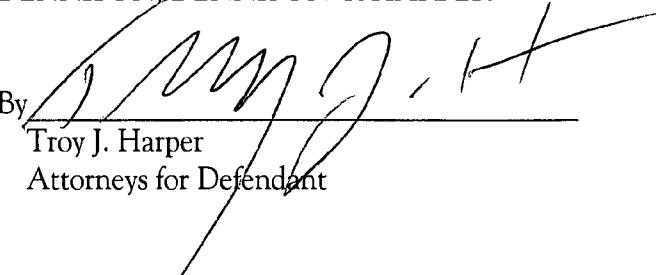
PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of Keystone Rehabilitation Systems, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, Keystone Rehabilitation Systems, 470 Jeffers Street,
DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

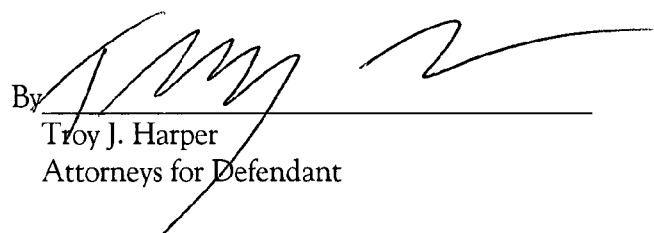
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Keystone Rehabilitation Systems
470 Jeffers Street
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(12)

FILED NO
M 10/4/2004 CC
DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

VS.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
P & G Physical Therapy
602-1 West DuBois Avenue
DuBois, PA 15801

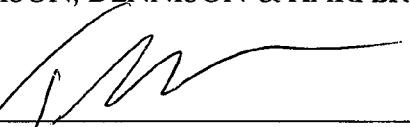
PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of P & G Physical Therapy, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

Defendant(s)

*

*

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

TO: Records Custodian, P & G Physical Therapy, 602-1 West DuBois Avenue, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

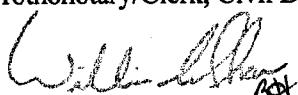
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

DATE: Wednesday, September 29, 2004

Seal of the Court

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

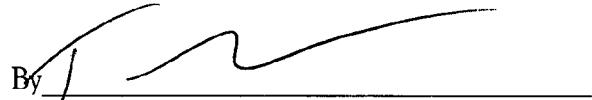
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
P & G Physical Therapy
602-1 West DuBois Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(r2)
FILED NO
M 10/4/2004
DEC 23 2004
William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
145 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of DuBois Regional Medical Center, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, DuBois Regional Medical Center, 145 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

Dennison, Dennison & Harper, 293 ^(Address) Main Street, Brookville, PA 15825

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

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

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

NAME: Troy J. Harper

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIAKATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
10:47 AM
DEC 23 2004
William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
West Penn Orthopaedics
211 Beaver Drive
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of West Penn Orthopaedics, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

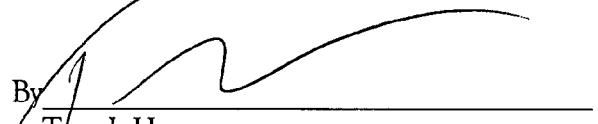
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Kathy L. Barraclough

*

James Barraclough

Plaintiff(s)

Vs.

*

No. 2003-01784-CD

Jessie I. Campbell

*

Defendant(s)

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

TO: Records Custodian, West Penn Orthopaedics, 211 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

(Address)

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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

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

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, September 29, 2004

Seal of the Court

Deputy

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

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

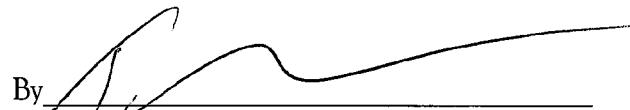
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
West Penn Orthopaedics
211 Beaver Drive
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 - C. D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

(2)
FILED *mcce*
11/10/4784
DEC 23 2004
William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2003 - 01784 C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Dela Torre Medical Clinic
231 Highland Street
Sykesville, PA 15865

PLEASE TAKE NOTE that the Defendant, Jessie I. Campbell, will take the deposition of the Records Custodian of Dela Torre Medical Clinic, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

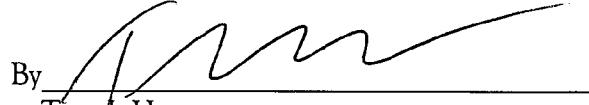
There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Any and all medical records in your possession for Kathy Barraclough, DOB: 10/10/1953, SSN: 160-48-3650, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

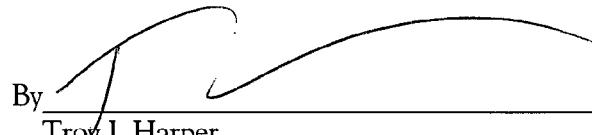
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22nd day of December, 2004, by United States Mail, First Class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer
Achille, Ellermeyer & French
379 Main Street
Brookville, PA 15825

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Dela Torre Medical Clinic
231 Highland Street
Sykesville, PA 15865

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of James Barraclough

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO cc
m 11-25-01
FEB 03 2005

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
*
*
*
*
* Number 2003 - 01784 C.D.

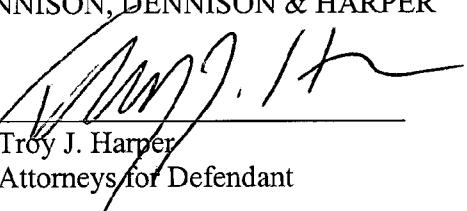
NOTICE OF DEPOSITION

TO: James Barraclough
c/o Joseph H. Ellermeyer, Esquire
ACHILLE, ELLERMEYER & FRENCH
379 Main Street
Brookville, PA 15825

Take notice that the deposition of **JAMES BARRACLOUGH** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, March 28, 2005, at 2:30 p.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

Date: February 2, 2005

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

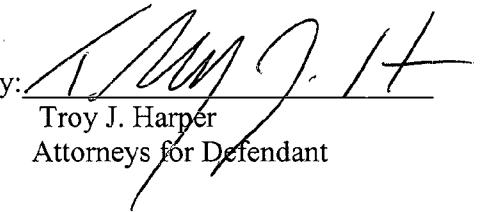
CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2005, a true and correct copy of the foregoing Notice of Deposition for James Barracough was mailed by United States mail, first class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esquire
ACHILLE, ELLERMAYER & FRENCH
379 Main Street
Brookville, PA 15825

Sargent's Court Reporting Service, Inc.
210 Main Street
Johnstown, PA 15901

DENNISON, DENNISON & HARPER

By: 
Troy J. Harper
Attorneys for Defendant

FILED

FEB 03 2005

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 01784 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Kathy L. Barraclough

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

6/12/01
FILED
FEB 03 2005
cc

William A. Shaw
Prothonotary/Clerk of Courts

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
*
*
*
*
* Number 2003 - 01784 C.D.

NOTICE OF DEPOSITION

TO: Kathleen L. Barraclough
c/o Joseph H. Ellermeyer, Esquire
ACHILLE, ELLERMEYER & FRENCH
379 Main Street
Brookville, PA 15825

Take notice that the deposition of **KATHLEEN L. BARRACLOUGH** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, March 28, 2005, at 1:30 p.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

Date: February 2, 2005

DENNISON, DENNISON & HARPER

By:


Troy J. Harper
Attorneys for Defendant

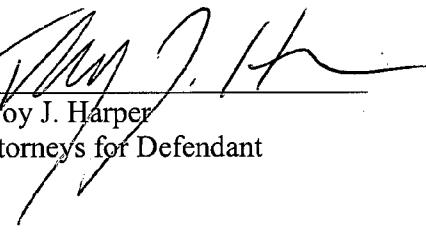
CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2005, a true and correct copy of the foregoing Notice of Deposition for Kathy L. Barraclough was mailed by United States mail, first class, postage prepaid, addressed to the following:

Joseph H. Ellermeyer, Esquire
ACHILLE, ELLERMEYER & FRENCH
379 Main Street
Brookville, PA 15825

Sargent's Court Reporting Service, Inc.
210 Main Street
Johnstown, PA 15901

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - Law

No.: 1784 C.D. 2003

Type of Pleading:
CERTIFICATE OF READINESS

Filed on behalf of: Plaintiffs

Counsel of Record for this
Party:

Joseph H. Ellermeyer, Esquire
Achille, Ellermeyer & Wallisch,
Attorneys at Law
379 Main Street
Brookville, PA 15825
814 849-6701
I.D. No. 43944

FILED NOCC
m 112:53 AM ⑥
DEC 08 2008

5
William A. Shaw
Prothonotary/Clerk of Courts

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
CIVIL TRIAL LISTING**

CERTIFICATE OF READINESS (To be executed by Trial Counsel Only)		TO THE PROTHONOTARY
DATE PRESENTED		
CASE NUMBER 1784 cd 2003 Date Complaint filed:	TYPE TRIAL REQUESTED () Jury <input checked="" type="checkbox"/> Non-jury () Arbitration	ESTIMATED TRIAL TIME / DAYS

PLAINTIFF(S)

Kathy L. Barraclough and James Barraclough, her husband, ()

DEFENDANT(S)

Jessie I. Campbell ()

Check Block
if a Minor
is a Party
to the Case

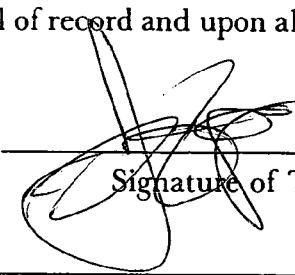
ADDITIONAL DEFENDANT(S)

()

JURY DEMAND FILED BY:	DATE JURY DEMAND FILED:
AMOUNT AT ISSUE \$	CONSOLIDATION () Yes () No
DATE CONSOLIDATION ORDERED	

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.

I certify that all discovery in the case has been completed; all necessary parties and witnesses are available; serious settlement negotiations have been conducted; the case is ready in all respects for trial, and a copy of this Certificate has been served upon all counsel of record and upon all parties of record who are not represented by counsel.



Signature of Trial Counsel

COUNSEL WHO WILL ACTUALLY TRY THE CASE

FOR THE PLAINTIFF Joseph H. Ellermeyer, Esquire	TELEPHONE NUMBER 814/849-6701
FOR THE DEFENDANT Troy Harper, Esquire	TELEPHONE NUMBER 814/849-8316
FOR ADDITIONAL DEFENDANT	TELEPHONE NUMBER

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

KATHY BARRACLOUGH and JAMES
BARRACLOUGH, her husband,
Plaintiffs

VS.
JESSIE I. CAMPBELL,
Defendant

* NO. 03-1784-CD

ORDER

AND NOW, this 15th day of December, 2008, it is the ORDER of the Court
that a Pre-Trial Conference in the above matter shall be held on the **21st day of**
January, 2009 in Chambers at 1:30 o'clock p.m.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED 2008
01/14/09
DEC 15 2008
Attns:
Ellesmeyer
Harper
S William A. Shaw
Prothonotary/Clerk of Courts
(610)

FILED

DEC 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 12/15/08

You are responsible for serving all appropriate parties.
 The Plaintiff(s) office has provided service to the following parties:
Plaintiff(s) Plaintiff(s) Attorney Other
Defendant(s) Defendant(s) Attorney Other
SPECIAL INSTRUCTIONS:

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

KATHY BARRACLOUGH and JAMES
BARRACLOUGH,

Plaintiffs,

vs.

JESSIE I. CAMPBELL,

Defendant.

CIVIL ACTION - LAW

Number 2003 - 1784 C.D.

Type of Case: Civil Division

Type of Pleading: Motion for Continuance

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *rec*
JAN 09 2009 *Atty Harper*
S *2010-2784*
William A. Shaw
Prothonotary/Clerk of Courts
(610)

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 1784 C.D.

MOTION FOR CONTINUANCE

AND NOW, comes the Defendant, JESSIE I. CAMPBELL, by and through her attorneys, Dennison, Dennison & Harper, who file the following Motion for Continuance:

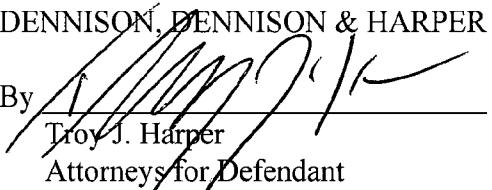
1. A Pretrial Conference has been scheduled by the Court for January 21, 2009, at 1:30 p.m. in the above-captioned matter.
2. Counsel for the Defendant is unavailable for the Pretrial Conference on that date as he was already previously scheduled to be in Philadelphia on that date for conference in regard to the finalization of a corporate acquisition.
3. In addition, counsel for the Plaintiffs and counsel for the Defendant agree that a continuance of this matter for at least forty-five (45) days will afford the parties an opportunity to make substantial progress toward a final settlement of the case and perhaps obviate the need for trial.
4. Counsel for the Plaintiffs consents to the grant of a continuance of this matter. A Consent executed by counsel for the Plaintiffs is attached hereto.

5. This matter has not appeared on any previous Trial List and has never been previously continued.

6. In light of the foregoing, the parties request this Honorable Court to continue the Pretrial Conference for at least forty-five (45) days.

WHEREFORE, the Defendant, Jessie I. Campbell, respectfully requests that the Pretrial Conference scheduled on January 21, 2009, be continued for at least forty-five (45) days.

RESPECTFULLY SUBMITTED,

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 1784 C.D.

CONSENT

Joseph H. Ellermeyer, Esq., as counsel for the Plaintiffs in the above-captioned matter
hereby joins in and consents to the foregoing Motion for Continuance.

ACHILLES ELLERMEYER & WALLISCH

By

Joseph H. Ellermeyer, Esq.
Counsel for the Plaintiffs.

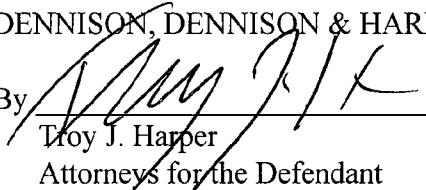
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion for Continuance was served on the 8th day of January, 2009, by United States Mail, First Class, Postage Prepaid, addressed to the following:

Joseph H. Ellermeyer, Esq.
Achille, Ellermeyer & Wallisch
379 Main Street
Brookville, Pennsylvania 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for the Defendant

KATHY L. BARRACLOUGH and JAMES
BARRACLOUGH,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
* Civil Action - Law
*
*
* Number 2003 - 1784 C.D.

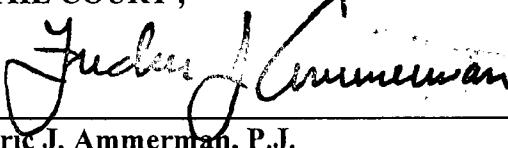
ORDER

AND NOW, this 9th day of JANUARY, 2009, upon consideration
of the Defendant's Motion for Continuance;

IT IS HEREBY ORDERED that said Motion is granted and the Pretrial Conference
scheduled for January 21, 2009, is continued and is rescheduled for

March 17, 2009, at 9:30 A.M. o'clock in Chambers.

BY THE COURT,



Fredric J. Ammerman, P.J.

FILED
01/10/09 2009
JAN 12 2009 Atty Harper
S William A. Shaw
Prothonotary/Clerk of Courts
610

FILED

JAN 12 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 1/12/09

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney Other

Special Instructions:

FILED *Fac*

MAR 13 2009

12:15 PM

William A. Shaw
Prothonotary/Clerk of Courts

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

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH, her husband,

Plaintiffs,

CIVIL ACTION - Law

vs.

No.: 1784 C.D. 2003

JESSIE I. CAMPBELL,

Type of Pleading:

**PRAECIPE FOR
DISCONTINUANCE**

Defendant.

Filed on behalf of: Plaintiffs

Counsel of Record for this
Party:

Joseph H. Ellermeyer, Esquire
Achille, Ellermeyer & French,
Attorneys at Law
379 Main Street
Brookville, PA 15825
814 849-6701
I.D. No. 43944

KATHY L. BARRACLOUGH and
JAMES BARRACLOUGH,
her husband,
Plaintiffs,

vs.

JESSIE I. CAMPBELL,
Defendant.

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

:
: CIVIL ACTION - Law

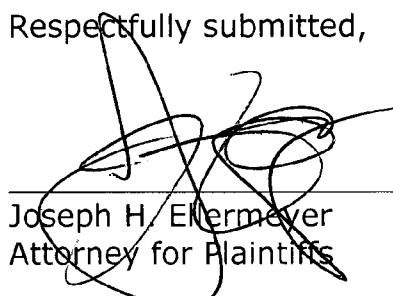
:
: No.: 1784 C.D. 2003

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Please mark the above-captioned action as discontinued.

Respectfully submitted,


Joseph H. Ellermeyer
Attorney for Plaintiffs