

04-617CD

Carl R. Schiffman

Plff
vs

Trangle Suspension
Systems, Inc.
425 Maloney Road
Hubers, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHRISTOPHER DOWNER and
STACY DOWNER, his wife,

Plaintiffs,

v.

TRIANGLE SUSPENSION
SYSTEMS, INC.,

Defendant.

CIVIL DIVISION

No. 04-1617-C2

**PRAECIPE FOR WRIT OF
SUMMONS**

Filed on Behalf of Plaintiffs

Counsel of Record for this Party:

Carl R. Schiffman, Esquire
PA I.D. #23626

Schiffman & Wojdowski
Firm I.D. #466
1300 Fifth Avenue
Pittsburgh, PA 15219

(412) 288-9444

FILED

MAY 03 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHRISTOPHER DOWNER and
STACY DOWNER, his wife,

CIVIL DIVISION

No.

Plaintiffs,

v.

TRIANGLE SUSPENSION
SYSTEMS, INC.,

Defendant.

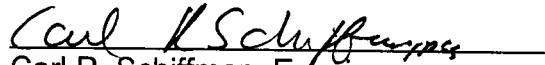
PRAECIPE FOR WRIT OF SUMMONS

TO: PROTHONOTARY

Kindly issue a Writ of Summons in the above-captioned matter.

Respectfully submitted,

Schiffman & Wojdowski



Carl R. Schiffman, Esquire
Attorney for Plaintiffs

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



SUMMONS

**Christopher Downer and
Stacy Downer, his wife**

Vs.

NO.: 2004-00617-CD

Triangle Suspension Systems, Inc.

TO: TRIANGLE SUSPENSION SYSTEMS, INC.

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

Date: 05/03/2004

William A. Shaw
Prothonotary

Issuing Attorney:

Carl R. Schiffman
1300 Fifth Avenue
Pittsburgh, PA 15219
(412) 288-9444

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHRISTOPHER DOWNER and
STACY DOWNER, his wife,

Plaintiffs,

v.

TRIANGLE SUSPENSION
SYSTEMS, INC.,

Defendant.

CIVIL DIVISION

No. 04-617-CD

**REQUEST UPON A PARTY FOR
PRODUCTION OF DOCUMENTS
AND THINGS**

Filed on Behalf of Plaintiffs

Counsel of Record for this Party:

Carl R. Schiffman, Esquire
PA I.D. #23626

Schiffman & Wojdowski
Firm I.D. #466
1300 Fifth Avenue
Pittsburgh, PA 15219

(412) 288-9444

FILED

MAY 03 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHRISTOPHER DOWNER and
STACY DOWNER, his wife,

CIVIL DIVISION

No.

Plaintiffs,

v.

TRIANGLE SUSPENSION
SYSTEMS, INC.,

Defendant.

**REQUEST UPON A PARTY FOR PRODUCTION
OF DOCUMENTS AND THINGS**

AND NOW, come the Plaintiffs, Christopher Downer and Stacy Downer, his wife, by and through their attorneys, Schiffman & Wojdowski and Carl R. Schiffman, Esquire, and pursuant to Pa.R.C.P. 4009.11 et seq. request you to produce the following documents within thirty (30) days by mailing the same to Carl R. Schiffman, Esquire, Schiffman & Wojdowski, 1300 Fifth Avenue, Pittsburgh, PA 15219.

1. All documents including but not limited to correspondence, receipts, invoices, manuals, shop manuals, photographs, diagrams, charts, blueprints and schematics regarding the company or entity that installed or added or modified or repaired the light curtains or other guards added to the Hendley and Whittemore 2 ½ ton "Alligator" shear machine upon which Christopher Downer was injured.

ANSWER:

2. All documents including but not limited to correspondence, receipts, invoices, manuals, shop manuals, photographs, diagrams, charts, blueprints and schematics regarding repairs or maintenance of the Hendley and Whittemore 2 ½ ton “Alligator” shear machine upon which Christopher Downer was injured.

ANSWER:

3. All documents including but not limited to correspondence, receipts, invoices, regarding the sale and purchase of the Hendley and Whittemore 2 ½ ton “Alligator” shear machine upon which Christopher Downer was injured.

ANSWER:

4. All documents including but not limited to correspondence, receipts, invoices, manuals, shop manuals, photographs, diagrams, charts, blueprints and schematics regarding the design, operation, manufacture or use of the Hendley and Whittemore 2 ½ ton "Alligator" shear machine upon which Christopher Downer was injured.

ANSWER:

Respectfully submitted:
SCHIFFMAN & WOJDOWSKI

By Carl R. Schiffman
Carl R. Schiffman, Esquire
Attorney for Plaintiffs

In The Court of Common Pleas of Clearfield County, Pennsylvania

DOWNER, CHRISTOPHER & STACY

VS.

Sheriff Docket # 15519

04-617-CD

TRIANGE SUSPENSION SYSTEMS, INC.

PRAECIPE; SUMMONS; REQUEST UPON A PARTY FOR PRODUCTI

SHERIFF RETURNS

NOW MAY 6, 2004 AT 10:35 AM SERVED THE WITHIN PRAECIPE, SUMMONS, REQUEST UPON A PARTY FOR PRODUCTION OF DOCUMENTS AND THINGS ON TRIANGLE SUSPENSION SYSTEMS INC., DEFENDANT AT EMPLOYMENT, 425 MALONEY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO NANCY PLOWS, HUMAN RESOURCE MGR. A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE, SUMMONS, etc. AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: MCCLEARY/COUDRIET

Return Costs


Cost	Description
32.25	SHERIFF HAWKINS PAID BY: ATTY CK# 14132
10.00	SURCHARGE PAID BY: ATTY CK# 14131

Sworn to Before Me This

18 Day Of May 2004


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

So Answers,


Chester A. Hawkins
Sheriff

FILED

01251871
MAY 18 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHRISTOPHER DOWNER and
STACY DOWNER, his wife,

Plaintiffs,

vs.

TRIANGLE SUSPENSION
SYSTEMS, INC.,

Defendant.

CIVIL DIVISION

CASE NUMBER: 04-617-CD

TYPE OF PLEADING:
PRAECIPE TO DISCONTINUE

FILED ON BEHALF OF:
Christopher Downer and Stacy
Downer, his wife, Plaintiffs

COUNSEL OF RECORD:
Carl R. Schiffman, Esquire
Pa. I.D. #23626

SCHIFFMAN & WOJDOWSKI
1300 Fifth Avenue
Pittsburgh, PA 15219
412/288-9444

FIRM I.D. #466

FILED No CC
018:564m
MAR 20 2013
William A. Shaw
Prothonotary/Clerk of Courts

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

CHRISTOPHER DOWNER and)	
STACY DOWNER, his wife,)	
)	NO.:04-617-CD
Plaintiffs,)	
)	
vs.)	
)	
TRIANGLE SUSPENSION)	
SYSTEMS, INC.,)	
)	
Defendant.)	

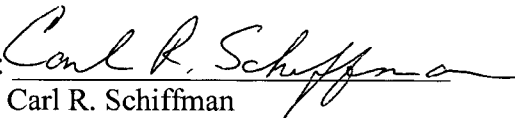
PRAECIPE TO DISCONTINUE

TO: WILLIAM A. SHAW, PROTHONOTARY

Kindly discontinue the above-captioned case.

RESPECTFULLY SUBMITTED:

SCHIFFMAN & WOJDOWSKI

By: 
Carl R. Schiffman
Attorney for Plaintiffs