



04-617CD

Plff  
vs

Carl R. Schiffman

Triangle Suspension  
Systems, Inc.  
425 Maloney Road  
Slubors, 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. 04-1-17-03

**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*  
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**

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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. 04-1e17-CO

**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.

TRIANGLE SUSPENSION SYSTEMS, INC.

Sheriff Docket # 15519

04-617-CD

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

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**Return Costs**

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

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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*  
Chester A. Hawkins  
Sheriff

**FILED**  
*04-617-CD*  
MAY 18 2004  
*WAS*

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  
018:56 am  
S MAR 20 2013 66  
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, )  
Plaintiffs, ) NO.:04-617-CD  
vs. )  
TRIANGLE SUSPENSION )  
SYSTEMS, INC., )  
Defendant. )

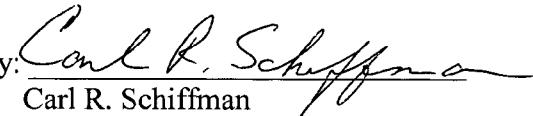
**PRAECIPE TO DISCONTINUE**

TO: WILLIAM A. SHAW, PROTHONOTARY

Kindly discontinue the above-captioned case.

RESPECTFULLY SUBMITTED:

SCHIFFMAN & WOJDOWSKI

By:   
Carl R. Schiffman  
Attorney for Plaintiffs