

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

CIVIL DIVISION

**EDWARD R GREENUP, ESQ.,
Plaintiff,**

CIVIL DIVISION

vs.

**JAN KAZIMIERZ CIEPIELA,
Defendant.**

No.: 04-889-①

**PRAECIPE TO ENTER
FOREIGN JUDGMENT**

Code: 010 - Contract

**Filed on Behalf of:
EDWARD R GREENUP, ESQ.,
Plaintiff**

**Counsel of Record for this
Party:**

**George A. Miller, Esquire
PA I.D. #22525**

**BROMBERG & MILLER
Firm I.D. No. 937
1106 Fifth Avenue
Pittsburgh, PA 15219
(412) 232-0440**

File 56928

FILED

JUN 17 2004

**William J. Shaw
Prothonotary**

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

CIVIL DIVISION

EDWARD R GREENUP, ESQ.,

Plaintiff,

CIVIL DIVISION

vs.

JAN KAZIMIERZ CIEPIELA,

Defendant.

No.:

PRAECIPE TO ENTER FOREIGN JUDGMENT

TO: PROTHONOTARY:

Please enter the attached Foreign Judgment and mail notice of the filing thereof to the judgment debtor/s. Judgment was entered in the amount of ONE THOUSAND TWO HUNDRED THIRTY AND 77/100 DOLLARS (\$1230.77), together with interest at the legal rate from date on entry hereof, plus the costs of this action.




George A. Miller, Esq.
Attorney for Plaintiff
1106 Fifth Avenue
Pittsburgh, PA 15219
(412) 232-0440

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF ALLEGHENY)

Before me, the undersigned authority, a Notary Public in and for the above County and State, personally appeared George A. Miller, Esquire, who, being duly sworn according to the law, deposes and says that he is the attorney for the Plaintiff, EDWARD R GREENUP, ESQ., and that the Defendant, JAN KAZIMIERZ CIEPIELA, has a last known address of 1683 Treasure Lake, Dubois, PA 15801. The Foreign Judgment from the State of Michigan, 37th Judicial District, Docket No. 03 4264 GC, is fully valid, enforceable, and unsatisfied.

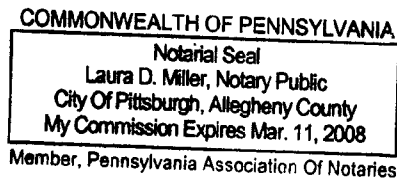
Dated this 14th, day of June, 2004.


George A. Miller, Esq.
Attorney for Plaintiff
EDWARD R GREENUP, ESQ.

Sworn to and subscribed before me
this 14th day of June, 2004.

Laura L. Miller

Notary Public



pproved, SCAO

Original - Court
1st copy - Plaintiff
2nd copy - Defendant

STATE OF MICHIGAN
37TH JUDICIAL DISTRICT
JUDICIAL CIRCUIT

JUDGMENT
Civil

CASE NO.
03 4264 GC

Court address 8300 Common Road
Warren, Michigan 48093

Court telephone no.
(586) 574-4969

Plaintiff(s)
EDWARD R. GREENUP, ESQ.

Defendant(s)
JAN KAZIMIERZ CIEPIELA

v

EDWARD R. GREENUP, ESQ.

EDWARD R. GREENUP, P 23337
25400 Little Mack Avenue
St. Clair Shores, Michigan 48081
(586) 774-2222

Plaintiff/Attorney

JAN KAZIMIERZ CIEPIELA
28863 Panama Street
Warren, Michigan 48092

Defendant/Attorney

☒ JUDGMENT

For: Plaintiff

Against: Defendant

☐ Trial ☐ Consent
☐ Summary Disposition ☒ Default

☐ DISMISSAL

☐ Without prejudice ☐ With prejudice

ORDER OF JUDGMENT

Damages \$ 1,031.27
Interest \$ 5.80
Costs \$ 103.15
Other (specify) \$ 75.00
Judgment \$ 1,215.22

Other conditions, if any:
statutory attorney fees

This judgment will earn interest at current statutory rates.

☐ A note or other written evidence of indebtedness has been filed with the clerk for cancellation.

☐ Approved as to form, notice of entry waived.

IT IS ORDERED that this judgment is granted.

1-8-04
Judgment date

as
Judge/Court clerk

Bar no.

Plaintiff/Attorney EDWARD R. GREENUP

Defendant/Attorney

Judgment has been entered and will be final unless within 21 days of judgment date a motion for new trial or an appeal is filed.

CERTIFICATE OF MAILING

I certify that a copy of this judgment was served upon the other party(ies) or their attorney(s) by ordinary mail at the above address(es).

1-8-04
Date

as
Signature

A Approved, SCAO

STATE OF MICHIGAN
37TH JUDICIAL DISTRICT
JUDICIAL CIRCUIT

DEFAULT
APPLICATION, ENTRY, AFFIDAVIT

CASE NO.

03 4264 GC

Court address 8300 Common Road
Warren, Michigan 48093

Court telephone no.
(586) 574-4969

Plaintiff name(s), address(es), and telephone no(s).
EDWARD R. GREENUP, ESQ.
25400 Little Mack Avenue
St. Clair Shores, Michigan 48081

v

Defendant name(s), address(es), and telephone no(s).
JAN KAZIMIERZ CIEPIELA
28863 Panama Street
Warren, Michigan 48092

Plaintiff attorney, bar no., address, and telephone no.
EDWARD R. GREENUP, P 23337
25400 Little Mack Avenue
St. Clair Shores, Michigan 48081
(586) 774-2222

Defendant attorney, bar no., address, and telephone no.

Party in default: **JAN KAZIMIERZ CIEPIELA**

APPLICATION

In accordance with court rule, I request the clerk to enter the default of the party named above for failure to plead or otherwise defend as provided by law.

Applicant/Attorney Signature

EDWARD R. GREENUP

P23337
Bar no.

DEFAULT ENTRY

The default of the party named above for failure to plead or otherwise defend is entered.

Date

1-8-04

By

Deputy Court Clerk

Court clerk

The affidavit must be completed by the applicant before filing the application with the court.

AFFIDAVIT

- ☒ 1. The claim against the defaulted party is for a sum certain or for a sum which by computation can be made certain, and the plaintiff requests judgment of the amount due from the above party.

The amount due and costs are:

| Damages | Interest | Costs | Other* | Total |
|------------|----------|----------|----------|-------------|
| \$1,031.27 | \$5.80 | \$103.15 | \$ 75.00 | \$ 1,215.22 |

*Attach bill of costs

2. The defaulted party is not an infant or incompetent person.

3. The defaulted party ☒ is not in the military service. ☐ is in the military service but there has been notice of the pendency of the action and adequate time and opportunity to appear and defend.

4. The claim ☐ is ☐ is not based on a note or other written evidence. If so, the evidence is attached for filing and for cancellation by the court clerk.

Applicant/Attorney signature

EDWARD R. GREENUP

Subscribed and sworn to before me on

December 26, 2003

Date

Macomb

County, Michigan.

My commission expires: **July 16, 2004**

Date

Signature:

YVONNE PUFFPAFF
Deputy court clerk/Notary public

YVONNE PUFFPAFF

1000 1000 1000
N 1:30134 *Robert D. Dwyer*
JUN 17 2004 *Robert D. Dwyer*

William A. Shaw
Prothonotary

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

Edward R. Greenup

Vs.

No. 2004-00889-CD

Jan Kazimierz Ciepiela

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$1,230.77 on the June 17, 2004.

William A. Shaw
Prothonotary

William A. Shaw

Date: 04/15/2004

Clearfield County Court of Common Pleas

User: BANDERSON

Time: 09:52 AM

ROA Report

Page 5 of 5

Case: 2002-00098-CD

Current Judge: Paul E. Cherry

Bradley T. Gray vs .Tamara Marie Gray, William M. Gray, Joan Gray

Divorce with Custody

| Date | | Judge |
|------------|--|------------------|
| 03/15/2004 | RULE, AND NOW, this 15th day of March, 2004, issued and directed to Christopher E. Mohney, Esquire, Attorney for William M. Gray and Joan Gray. RULE RETURNABLE, before the Court on the 19th day of April, 2004, at 2:30 p.m., in Courtroom No. 2. by the Court, s/PEC, J. 4 cc to Atty | Paul E. Cherry ✓ |
| 04/07/2004 | Motion for Protective Order, filed by s/Christopher E. Mohney, Esq. Three CC Attorney Mohney | Paul E. Cherry ✓ |
| 04/13/2004 | ORDER, AND NOW, this 13th day of April, 2004, re: Hearing scheduled for the 19th day of April, 2004 at 2:00 p.m. on Additional Defendant's Motion for Protective Order in Courtroom #2. by the Court, s/PEC, J. 3 cc Atty Mohney | Paul E. Cherry ✓ |

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

Edward R. Greenup
Plaintiff(s)

No.: 2004-00889-CD

Real Debt: \$1,230.77

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Jan Kazimierz Ciepiela
Defendant(s)

Entry: \$20.00

Instrument: Foreign Judgment

Date of Entry: June 17, 2004

Expires: June 17, 2009

Certified from the record this 17th day of June, 2004

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

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

Plaintiff/Attorney

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

FRANK J. LAIRD, Trustee under Trust :
Agreement of February 24, 1988, and : No. 98 - 51 - CD
VERNON C. KEESEY, JR., Individually and :
on behalf of a Class of the Minority :
Shareholders of THE CLEARFIELD & :
MAHONING RAILROAD COMPANY, :
a Pennsylvania Corporation and, Derivatively :
on behalf of THE CLEARFIELD & :
MAHONING RAILROAD COMPANY, :
Plaintiffs, :
vs. :

THE CLEARFIELD & MAHONING :
RAILROAD COMPANY, a Pennsylvania :
Corporation, BUFFALO, ROCHESTER & :
PITTSBURGH RAILWAY COMPANY, :
a Pennsylvania Corporation, :
CSX TRANSPORTATION, INC., :
a Pennsylvania Corporation, :
R.J. CORMAN RAILWAY COMPANY/ :
PENNSYLVANIA LINES, INC., :
a Pennsylvania Corporation, and :
RICHARD J. CORMAN, :
Defendants, :
and :
CONSOLIDATED RAIL CORPORATION, :
and :
DAVID R. IRVIN, :
Additional Defendants. :

DEFENDANTS R.J. CORMAN RAILWAY COMPANY/PENNSYLVANIA LINES, INC.,
and RICHARD J. CORMAN'S ANSWER and NEW MATTER TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE A THIRD AMENDED COMPLAINT and TO
CONDUCT LIMITED DISCOVERY

AND NOW, come Defendants R.J. Corman Railway Company/Pennsylvania Lines, Inc.
and Richard J. Corman by and through their counsel, McQuaide, Blasko, Schwartz, Fleming &
Faulkner, Inc., and file the following Answer to Plaintiffs' Motion to Amend/Motion to Conduct