

Glenn Falls vs Michael Lawson

2004-1747-CD

Glenn Falls vs Michael Lawson

File #07-04-566

LAW OFFICES OF STEWART C. CRAWFORD & ASSOCIATES
BY: Stewart C. Crawford, Esquire
ATTORNEY I.D. # 09827
223 North Monroe Street
P.O. Box E
Media, PA 19063
Telephone: (610) 565-7050

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

CIVIL ACTION – LAW

Glenn Falls Insurance Company	:	IN CIVIL ACTION
P.O. Box 29500	:	
Roanoke, VA 24018	:	
	:	
vs.	:	NO: 2004-1747-COP
	:	
Michael Lawson	:	
160 Weber Road	:	
Luthersburg, PA 15848	:	

FILED *(Handwritten)*

NOV 03 2004

W/3-001
William A. Shaw

Prothonotary/Clerk of Courts

*I CANT TO SURE
I CANT TO WIT*

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CANNOT PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
814-765-2641 Ext. 5982

07-04-566

LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES

BY: Stewart C. Crawford, Esquire

ATTORNEY I.D. # 09827

223 North Monroe Street

Attorney for Plaintiff

Media, PA 19063

Telephone: (610) 565-7050

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL ACTION – LAW

Glenn Falls Insurance Company	:	IN CIVIL ACTION
P.O. Box 29500	:	
Roanoke, VA 24018	:	
	:	
Vs.	:	
	:	
Michael Lawson	:	
160 Weber Road	:	
Luthersburg, PA 15848	:	NO.

COMPLAINT
4030 Motor Vehicle Property Damage

1. Plaintiff is an insurance company licensed and authorized to do business in the Commonwealth of Pennsylvania with one of its principle places of business at the above captioned address.
2. Defendant is an adult individual and at all times pertinent hereto resided at the above captioned address.
3. On December 13, 2001, Plaintiff's insured, Avonelle Snyder, was involved in an accident with Defendant.
4. Thereafter, Plaintiff did accept liability for this loss.
5. On or about February 13, 2002, Plaintiff did issue payment to Defendant Lawson for the amount of \$2, 213.81 for the damages to his motor vehicle.
6. Thereafter, Plaintiff realized it owed Defendant Lawson's lien holder, DuBois Financial, so Plaintiff advised Defendant Lawson and Defendant Lawson agreed to pay to DuBois Financial the \$2, 213.81 check which it should have received.

7. Thereafter, DuBois Financial advised Plaintiff that Defendant Lawson had not paid DuBois Financial.
8. Plaintiff then on or about May 8, 2002 paid Dubois Financial \$2, 213.81.
9. Plaintiff has made demand upon Defendant Lawson to reimburse Plaintiff in the amount of \$2, 213.81.
10. Defendant Lawson has refused to reimburse Plaintiff.

WHEREFORE, Plaintiff demands judgment for \$2, 782.42 plus interest and costs of suit.



Stewart C. Crawford, Esquire
Attorney for Plaintiff

VERIFICATION

The undersigned verifies that the statements contained in the foregoing Complaint are true and correct. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.



STEWART C. CRAWFORD, ESQUIRE
Attorney for Plaintiff

In The Court of Common Pleas of Clearfield County, Pennsylvania

GLENN FALLS INSURANCE COMPANY

VS.

LAWSON, MICHAEL

COMPLAINT

Sheriff Docket # 16567

04-1747-CD

SHERIFF RETURNS

NOW NOVEMBER 12, 2004 AT 2:45 PM SERVED THE WITHIN COMPLAINT ON MICHAEL LAWSON, DEFENDANT AT RESIDENCE, 160 WEBER ROAD, LUTHERSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO DOROTHY LAWSON, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

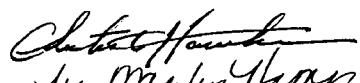
Cost	Description
30.75	SHERIFF HAWKINS PAID BY: ATTY Ck# 6795
10.00	SURCHARGE PAID BY: ATTY CK# 6796

Sworn to Before Me This

30th Day Of Nov. 2004


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

So Answers,


by Marilyn Harris
Chester A. Hawkins
Sheriff

FILED *egk*
09-30-04
NOV 30 2004

William A. Shaw
Prothonotary/Clerk of Courts

07-04-566

LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES
BY: Stewart C. Crawford, Esquire
ATTORNEY I.D. #09827
223 North Monroe Street
P.O. Box E
Media, Pennsylvania 19063
Telephone: (610) 565-7050

Attorney for Plaintiff

FILED
M 1:40 AM 2005
Searched, Indexed, Seriated
Plaintiff's Exhibit
Attala County, MS

JAN 24 2005

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL ACTION – LAW

GLENN FALLS INSURANCE COMPANY : NO. 2004-1747-CD

vs. :

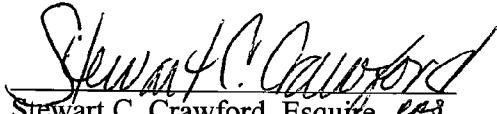
MICHAEL LAWSON : IN CIVIL ACTION

PRAECIPE FOR DEFAULT JUDGMENT
AND ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

Kindly enter a Default Judgment in favor of the Plaintiff and against the Defendant(s) MICHAEL LAWSON in the amount of \$2,213.81 for failure to Answer the Complaint in Civil Action within twenty (20) days from the date of service.

I hereby certify that pursuant to Local Rule of Court, I sent Notice to Defendant of intent to take Default. See attached.



Stewart C. Crawford, Esquire *LSAS*
Attorney for Plaintiff
I.D. #09827

ENTRY OF DEFAULT JUDGMENT

AND NOW, to wit, this day of , 2005 a Default Judgment is entered as above, namely in favor of the Plaintiff and against the Defendant.

DEPUTY PROTHONOTARY

07-04-566

LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES

BY: Stewart C. Crawford, Esquire

ATTORNEY I.D. #09827

223 North Monroe Street

Attorney for Plaintiff

P.O. Box E

Media, Pennsylvania 19063

Telephone: (610) 565-7050

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

GLENN FALLS INSURANCE COMPANY : NO. 2004-1747-CD

vs. :

MICHAEL LAWSON : IN CIVIL ACTION

NOTICE

Pursuant to Rule of Civil Procedure No. 236, Notice is given that a Default Judgment and Assessment of Damages in the above-captioned matter has been entered against you on _____,

PRO PROTHONOTARY

07-04-566

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

GLENN FALLS INSURANCE COMPANY : NO. 2004-1747-CD

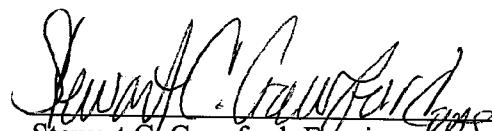
VS. :

MICHAEL LAWSON : IN CIVIL ACTION

AFFIDAVIT UNDER SOLDIERS' AND SAILORS'
CIVIL RELIEF ACT OF 1940 AS AMENDED

STATE OF PENNSYLVANIA :
SS
COUNTY OF CLEARFIELD :

Stewart C. Crawford, Esquire, being duly sworn according to the law that MICHAEL LAWSON is/are not in the military service of the United States of America as defined by the Soldiers' and Sailors' Civil Relief Act of 1940 as amended; that said Defendant(s) is/are over 18 years of age and is/are employed.



Stewart C. Crawford, Esquire
Attorney for Plaintiff #09827

Sworn to and subscribed
Before me this 21st day
Of JANUARY 2005.



NOTARY

Notarial Seal
Laureen Dufrayne, Notary Public
Upper Darby Twp., Delaware County
My Commission Expires Aug. 6, 2006

07-04-566

LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES

BY: Stewart C. Crawford, Esquire
ATTORNEY I.D. # 09827
223 North Monroe Street
Media, PA 19063
Telephone: (610) 565-7050

ATTORNEY FOR PLAINTIFF

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

CIVIL ACTION - LAW

GLENN FALLS INSURANCE COMPANY : IN CIVIL ACTION

VS. :
MICHAEL LAWSON : NO: 2004-1747-CD

TO: MICHAEL LAWSON
160 WEBER ROAD
LUTHERSBURG, PA 15848

DATE OF NOTICE: DECEMBER 14, 2004

IMPORTANT NOTICE

You are in default because you have failed to take action required of you in this case. Unless you act within Ten (10) Days from the date of this notice, a Judgment will be entered against you without a hearing and you may lose property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or can not afford one, go to or telephone the following office to find out where you can get legal help:

David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
814-765-2641 Ext. 5982

STEWART C. CRAWFORD, ESQ.
Attorney for Plaintiff(s)

V1-U9-266

In The Court of Common Pleas of Clearfield County, Pennsylvania

GLENN FALLS INSURANCE COMPANY

VS.

LAWSON, MICHAEL

COMPLAINT

Sheriff Docket # 16567

04-1747-CD

OP

SHERIFF RETURNS

NOW NOVEMBER 12, 2004 AT 2:45 PM SERVED THE WITHIN COMPLAINT ON MICHAEL LAWSON, DEFENDANT AT RESIDENCE, 160 WEBER ROAD, LUTHERSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO DOROTHY LAWSON, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

Cost	Description
30.75	SHERIFF HAWKINS PAID BY: ATTY Ck# 6795
10.00	SURCHARGE PAID BY: ATTY CK# 6796

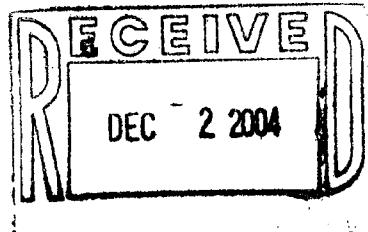
Sworn to Before Me This

So Answers,

____ Day Of _____ 2004

Chester A. Hawkins

Chester A. Hawkins
Sheriff



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

Glenn Falls Insurance Company
Plaintiff(s)

No.: 2004-01747-CD

Real Debt: \$2,213.81

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Michael Lawson
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: January 24, 2005

Expires: Januar 24, 2010

Certified from the record this 24th day of January, 2005

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

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

Plaintiff/Attorney

DL-201 (10-97)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

TO THE SECRETARY OF TRANSPORTATION

Glen Falls vs. Lawson
07-04-566

This is to certify that on 1/24/05 a judgment
for \$2,213.81 plus \$ was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME			SEX	DATE OF BIRTH		
FIRST	MIDDLE	LAST		MONTH	DAY	YEAR
<i>Michael Robert Lawson</i>			<i>M</i>	<i>06</i>	<i>03</i>	<i>69</i>
ADDRESS						
<i>160 Weber Road</i>						
CITY		STATE	ZIP CODE	SOCIAL SECURITY NUMBER		
<i>Luthersburg</i>		<i>PA</i>	<i>15848</i>			
DRIVER NUMBER		STATE	DATE OF ACCIDENT	CLAIM NUMBER		
<i>21851 117</i>		<i>PA</i>	<i>1/16/03</i>	<i>R1301623</i>		

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Glen Falls Ins. Co.
(NAME)
P.O. Box 29500
(STREET ADDRESS)
Roanoke VA 24018
(CITY & STATE)
(ZIP)
(TELEPHONE NUMBER)

REPRESENTATIVE FOR THE JUDGMENT

CREDITOR (If applicable)

Stewart C. Crawford, Esquire

(NAME)

223 N. Monroe Street

(STREET ADDRESS)

Media, PA 19063

(CITY & STATE)

610-565-7050

(TELEPHONE NUMBER)

FILED

AUG 11 2005

WILLIAM A. SHAW

Prothonotary/Clerk of Courts

*CERT TO ATTY
PA. READER*

THE ABOVE MENTIONED JUDGMENT AROSE FROM A MOTOR VEHICLE ACCIDENT. SIXTY DAYS HAVE ELAPSED SINCE THE ENTRY OF SAID JUDGMENT, AND THE SAME HAS NOT BEEN SATISFIED OF RECORD AND NO APPEAL HAS BEEN TAKEN THEREFROM.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of Aug. 11, 2005 1905

SEAL

WILLIAM A. SHAW
(SIGNATURE OF CLERK OR JUDGE OF THE
COURT IN WHICH THE JUDGMENT WAS ENTERED)

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

(TYPE) *Clearfield County, Clearfield, PA*

RETURN COMPLETED Bureau of Driver Licensing, P.O. Box 60037,
FORM TO: Harrisburg, Pennsylvania 17106-0037

SUBROGATION COLLECTION COMPANY
of the
LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES



P.O. BOX E ♦ MEDIA, PA 19063
PHONE (610) 565-7050 ♦ Fax (610) 565-5348

MAUREEN V. GIBSON
COLLECTION MANAGER
EXT. 11

KELLEY BRIGHT
ASSISTANT
EXT. 12

DONNA HOCHBERG
COLLECTION CLERK
EXT. 19

STEWART C. CRAWFORD, ESQ.
COUNSEL

August 3, 2005

Clearfield County
Office of Prothonotary
P.O. Box 549
Clearfield, PA 16830

Re: Glen Falls vs. Lawson
Our File # 07-04-566
Docket # 2004-1747-CD

Dear Sir or Madam:

Enclosed, please find a Certification of Motor Vehicle Judgment with regard to the above captioned matter to lift the defendant's driver's license, along with our check for \$3.00.

Please return the Certification in the envelope enclosed so that we may certify non-compliance to the Pennsylvania Department of Transportation.

Thank you for your assistance in this matter.

Very truly yours,

Kelley Bright
Kelley Bright

/kb
Enclosure(s)

Cc: Allstate Insurance Co.
Mr. Monty Hall
Cl# R1301623

07-04-566/mvg
LAW OFFICE OF STEWART C. CRAWFORD
BY: Stewart C. Crawford, Esquire
ATTORNEY I.D. #09827
223 North Monroe Street
P.O. Box E
Media, Pennsylvania 19063
Telephone: (610) 565-7050

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

GLEN FALLS INSURANCE CO. : 2004-1747-CD

VS. : :

MICHAEL ROBERT LAWSON : : IN CIVIL ACTION

STIPULATION TO RE-INSTATE DRIVING PRIVILEGES
TO THE PROTHONOTARY:

It is hereby STIPULATED by the parties through the
undersigned that the driving privileges of **MICHAEL ROBERT LAWSON**
be reinstated and remain so as long as Defendant abides by the
terms of the attached Conditional Release. If the Defendant fails
to keep payments up to date, **his** driving privileges will then be
suspended.

Stewart C. Crawford
STEWART C. CRAWFORD, ESQUIRE
Attorney for Plaintiff

X Michael Robert Lawson
MICHAEL ROBERT LAWSON

FILED 2cc
m 19:15/01 Atty
SEP 23 2005 Crawford
William A. Shaw
Prothonotary/Clerk of Courts

THIS AN ATTEMPT TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE

RE: GLEN FALLS VS. LAWSON
OUR FILE# 07-04-566 CT# 2004-1747-CD

CONDITIONAL RELEASE

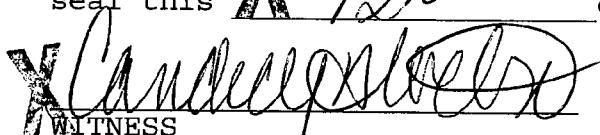
WHEREAS MICHAEL ROBERT LAWSON (hereinafter referred to as Defendant(s)) 160 WEBER ROAD, LUTHERSBURG, PA 15848 is indebted to ALLSTATE INSURANCE COMPANY (hereinafter referred to as Plaintiff(s)) in the sum of \$2,213.81 (full indebtedness sum) because of damages negligently caused to the Plaintiff and/or Plaintiff's insured(s) on or about JANUARY 16, 2003 at or near UNAVAILABLE.

WHEREAS the Safety Responsibility Division of the Department of Transportation of the Commonwealth of Pennsylvania has revoked the operating privileges of the said Defendant(s) and WHEREAS Plaintiff is willing to accept payments of the said indebtedness in monthly installments.

NOW, THEREFORE, it is agreed by and between Plaintiff and Defendant (s) that for and in consideration of the sum of \$2,213.81 receipt whereof is hereby acknowledged, and in consideration of the payment of \$50.00 between the first and last day of each month after the date hereof until the sum of \$2,213.81 shall have been paid, Plaintiff has released Defendant(s) from any and all responsibility arising out of a collision of a motor vehicle owned and/or operated by Defendant(s) and damages sustained by Plaintiff.

In the event that Defendant should fail in making payments as set forth above, the entire unpaid balance of the Settlement Sum shall immediately become due and owing at the option of the Plaintiff, who explicitly reserves the right to continue prosecution of its claim/enforcement of its Judgment for the aforementioned full indebtedness sum in lieu of enforcement of the Settlement Agreement recited in the preceding paragraph.

IN WITNESS  hereof the parties hereunto have set their hand and seal this 12th day of September, 2005.


WITNESS

MICHAEL ROBERT LAWSON

 814-583-7957
TELEPHONE NUMBER

***IF YOU DEFAULT ON THIS AGREEMENT, YOU WILL BE RESPONSIBLE FOR THE FULL BALANCE PLUS 6% INTEREST CALCULATED FROM DATE OF ENTRY OF JUDGMENT. IF YOUR PAYMENT IS NOT RECEIVED BY THE END OF EACH MONTH THERE IS A \$5.00 LATE CHARGE, \$10.00 MISSED PAYMENT CHARGE AND \$25.00 CHARGE FOR EACH BOUNCED CHECK. THIS WILL BE CALCULATED EACH AND EVERY MONTH AND ALL CHARGES MUST BE PAID IN FULL BEFORE CASE CAN BE CONCLUDED.

File #07-04-566/dj
LAW OFFICES OF STEWART C. CRAWFORD
BY: Stewart C. Crawford, Esquire
ATTORNEY I.D. #09827
223 North Monroe Street
P.O. BOX E
Media, PA 19063
Telephone: (610) 565-7050

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

GLEN FALLS INSURANCE COMPANY : 2004-1747-CD

VS.

MICHAEL ROBERT LAWSON : IN CIVIL ACTION

ORDER TO SATISFY

TO THE PROTHONOTARY:

Kindly mark the judgment SATISFIED, upon payment of your cost only.

Stewart Crawford
STEWART C. CRAWFORD, ESQ
Attorney for Plaintiff

FILED 218700 Atty
10/2/05 in 200-1 Cert of
AUG 24 2006 Sct issued to
UN Atty Crawford
William A. Shaw
Prothonotary/Clerk of Courts

SUBROGATION COLLECTION COMPANY
of the
LAW OFFICE OF STEWART C. CRAWFORD & ASSOCIATES



P.O. BOX E ♦ MEDIA, PA 19063
PHONE (610) 565-7050 ♦ Fax (610) 565-5348

MAUREEN V. GIBSON
COLLECTION MANAGER
EXT. 11

KELLEY BRIGHT
ASSISTANT
EXT. 12

DONNA HOCHBERG
COLLECTION CLERK
EXT. 19

STEWART C. CRAWFORD, ESQ.
COUNSEL

August 22, 2006

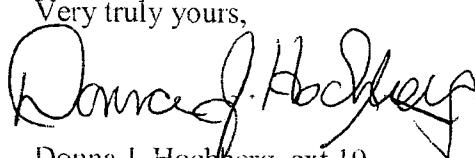
Prothonotary
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830

Re: Glen Falls vs. Lawson
Court# 2004-1747-CD
Our file: 07-04-566

Dear Sir or Madam:

Enclosed please find an original and copies of an Order to Satisfy. Please time stamp and return the copies in the envelope provided. I have also enclosed a check to cover cost.

If you have any questions please feel free to contact me.

Very truly yours,

Donna J. Hochberg, ext 19

DJH
Enclosures

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2004-01747-CD

Glenn Falls Insurance Company

Debt: \$

Vs.

Atty's Comm.:

Michael Lawson

Interest From:

Cost: \$7.00

NOW, Thursday, August 24, 2006 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 24th day of August, A.D. 2006.

William H. Sharpen

Prothonotary