

05-270-CD
Encompass et al vs. M. Inlow et al

MICHAEL PAUL INLOW, Fta1.

Encompass Ins. Et al v. Michael Inlow et al
2005-270-CD

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

ENCOMPASS INSURANCE COMPANY,
SUBROGEE OF REED & TYSON JOHNSON

vs.

MICHAEL PAUL INLOW and MICHAEL
INLOW and MAUREEN INLOW, PARENTS
OF MICHAEL PAUL INLOW

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS
ONLY

CASE NO.

05-270-CD

TYPE OF PLEADING:

Civil Action Complaint

CODE AND CLASSIFICATION:

FILED ON BEHALF OF :

Plaintiff(s)

NAME, ADDRESS AND TELEPHONE OF:

Counsel of Record

Robert E. Cherwony, Esquire
KRAFT & KRAFT, P.C.
1311 Spruce Street
Philadelphia, PA 19107
215-546-5100
Attorney No. 17623

FILED acc^{to} Shff
M 14/0061 FEB 28 2005 44y ad 85.00
William A. Shaw
Prothonotary/Clerk of Courts

KRAFT & KRAFT, P.C.
BY: Robert E. Cherwony, Esquire
Identification No. 17623
1311 Spruce Street
Philadelphia, PA 19107
(215) 546-5100

Attorney for Plaintiff(s)

ENCOMPASS INSURANCE COMPANY,
SUBROGEE OF REED & TYSON JOHNSON
3800 Electric Road
Roanoke, VA 24018

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PA

vs.

CIVIL ACTION AT LAW

MICHAEL PAUL INLOW and MICHAEL
INLOW and MAUREEN INLOW, PARENTS
OF MICHAEL PAUL INLOW
663 Coalhill Road
Clearfield, PA 16830

NO.

CIVIL ACTION COMPLAINT

"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 a written appearance personally or by 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 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN 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.

"AVISO"

"Le han demandado a usted en la corte. Si usted quiere defenderse de este demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demands y la notification. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notification. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

"LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL."

David Meholick
Court Administrator
1 N. 2nd Street
Clearfield, PA 16830

KRAFT & KRAFT, P.C.
BY: Robert E. Cherwony, Esquire
Attorney No. 17623
1311 Spruce Street
Philadelphia PA 19107
(215) 546-5100

Attorney for Plaintiff(s)

ENCOMPASS INSURANCE COMPANY,
SUBROGEE OF REED & TYSON JOHNSON
3800 Electric Road
Roanoke, VA 24018

COMMON PLEAS COURT OF
CLEARFIELD COUNTY, PA

v.

CIVIL ACTION AT LAW

MICHAEL PAUL INLOW and MICHAEL
INLOW and MAUREEN INLOW, PARENTS
OF MICHAEL PAUL INLOW
663 Coalhill Road
Clearfield, PA 16830

No.

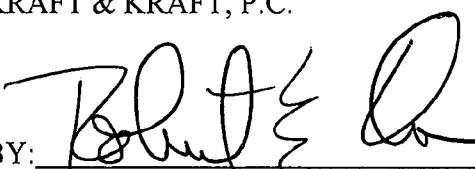
CIVIL ACTION

1. Plaintiff is a corporation with an address as set forth above.
2. Defendants are individuals who resides at the address set forth above.
3. On or about July 19, 2003 due to defendants' negligence and carelessness, plaintiff's insured sustained damages in the sum of \$5,616.94. Attached hereto, made a part hereof and marked Exhibit "A" is a true and correct copy of plaintiff's proof of liability.
4. Although demand has been made, defendants have failed and refused to compensate plaintiff.

WHEREFORE, plaintiff claims of the defendants the sum of \$5,616.94 plus interest in the amount of \$533.61, for a total of \$6,150.55 plus court costs, all of which are justly due and owing from the defendants to the plaintiff.

KRAFT & KRAFT, P.C.

BY:


Robert E. Cherwony, Esquire
Attorney for Plaintiff

8170-FM-FR0061 Rev. 8/2000
ATV law requires report
to be submitted within
seven days. Complete
all applicable sections or
form will be returned.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
BUREAU OF FORESTRY



SNOWMOBILE/ATV ACCIDENT REPORT

814 765-1188

1. TIME AND PLACE OF ACCIDENT

Date of Accident 7-19-03	Time <input checked="" type="checkbox"/> AM 6:00 <input type="checkbox"/> PM	State Pa	Township Lawrence	County Clfd
Accident Location (Name and address of property owner, Name of trail or area) S. Reed Johnson RD2 Box 64 Clearfield, PA 16830		Type of Terrain <input type="checkbox"/> Lake <input type="checkbox"/> Railroad <input type="checkbox"/> Trail-State Owned Land <input checked="" type="checkbox"/> Trail-Private Owned Land <input type="checkbox"/> Woods <input type="checkbox"/> Field <input type="checkbox"/> Roadway		

2. VEHICLE DATA

DRIVER 1 Michael Paul Inlow	DRIVER 2
Address 1663 Coal Hill Rd Clearfield PA	Address
Birthdate Mo. Dy. Yr. 9-1-86	Birthdate Mo. Dy. Yr.
License No. N/A	License No.
State PA	State
Sex Male	Sex
Reg. No. OHV-1	Reg. No. OHV-1
Expiration Date	Expiration Date
Owner Name Reed & Tyson Johnson	Owner Name
Address RD#2 Box 64 Clearfield, PA	Address
Vehicle Make	Vehicle Make
Type: ATV-3 Wheel ATV-4 Wheel <input checked="" type="checkbox"/>	Type: ATV-3 Wheel ATV-4 Wheel <input type="checkbox"/>
Other <input type="checkbox"/>	Snowmobile <input type="checkbox"/>
Serial No.	Serial No.
Model Arctic Cat 300 2001	Model
Yr. Of Mfg.	Yr. Of Mfg.
Horsepower	Horsepower
Color Red	Color
Describe Damage to Your Vehicle Twisted Frame Carns Equipment Co totaled ATV Was able to drive from accident scene & Able to drive Following DAY my car \$5,741.00	
Describe Damage to Your Vehicle	
Approximate Cost to Repair to replace with 2003	
Approximate Cost to Repair	
Operator Experience: (years) Less than 1 <input checked="" type="checkbox"/> 1-5 <input type="checkbox"/> More than 6 <input type="checkbox"/>	
Operator Experience: (years) Less than 1 <input type="checkbox"/> 1-5 <input type="checkbox"/> More than 6 <input type="checkbox"/>	

3. WEATHER CONDITIONS

A. Weather <input checked="" type="checkbox"/> Clear <input type="checkbox"/> Foggy	<input type="checkbox"/> Raining <input type="checkbox"/> Snowing	<input type="checkbox"/> Other	B. Visibility <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor	C. Surface <input type="checkbox"/> Gravel <input checked="" type="checkbox"/> Dirt <input type="checkbox"/> Pavement	D. Wearing Face Shield or Goggles? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E. Lights <input type="checkbox"/> On <input checked="" type="checkbox"/> Off
---	--	--------------------------------	--	--	--	---

4. OPERATION AT TIME OF ACCIDENT

A. <input checked="" type="checkbox"/> Moving <input type="checkbox"/> Not moving	B. Number of persons on Vehicle 1 Vehicle 2 <input checked="" type="checkbox"/>	C. Wearing Helmet <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D. Wearing Face Shield or Goggles? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E. Lights <input type="checkbox"/> On <input checked="" type="checkbox"/> Off
--	--	---	--	---

5. TYPE, NATURE OR CLASSIFICATION OF ACCIDENT

A. Fell or thrown off <input checked="" type="checkbox"/>	L. Number of deaths <input type="checkbox"/>
B. Skidding and overturned <input checked="" type="checkbox"/>	M. Number of personal injuries <input type="checkbox"/>
C. Collision with person <input type="checkbox"/>	N. Property damage:
D. Collision with motor vehicle <input type="checkbox"/>	1. Snowmobiles/ATV or motor vehicles Your Vehicle \$Total \$
E. Collision with another snowmobile/ATV <input type="checkbox"/>	2. Damage to Other Property \$ (Describe on reverse)
F. Collision with a fixed object <input type="checkbox"/>	
G. Clothing or extremity caught <input type="checkbox"/>	
H. Ice breakthrough <input type="checkbox"/>	
I. Struck hidden object in snow <input type="checkbox"/>	
J. Drop Off: <input type="checkbox"/> cliff <input type="checkbox"/> ditch <input checked="" type="checkbox"/> embankment	
K. Other:	

6. Give a brief, but clear description of the accident. Use additional sheets if necessary. (Draw a sketch of the accident.)

Driving up a trail and at the end of the tracks we came across a blind ravine and the 4-wheeler flipped over me and landed on it's wheels. Kyle Shirey was riding on the back.

(Attatched Sheet)

7. LIVES LOST

A. List Name and Addresses

None

8. PERSONS INJURED

A. List Names: Nature and extent of injury, include part of body

None

Bumps + bruises + abrasions

9. PROPERTY DAMAGE

A. Describe property damage, include name and address of owner:

S. Reed Johnson

RD#2

Clearfield, PA 16830

Arctic Cat 300 4x4 ATV

10. WITNESS

List names and addresses of all known witnesses

Name

Address

Kyle Shirey

1303 Crescent Dr. Clearfield, PA 16830

11. PERSONS ON SNOWMOBILE/ATV (other than operator)

Name

Address

Age

Kyle Shirey

1303 Crescent Dr. Clearfield, PA

17

12. ASSISTANCE FURNISHED

List known Police, Fire Dept., Rescue Squads, etc.

Address

NONE

13. If accident occurred on a State Township Road, was the road designated and posted "Open to snowmobiles" and/or ATV's

Not on a Township Road

Yes No

14. Did driver(s) complete a Pennsylvania Safety Training Program?

Yes No

To the best of my knowledge and belief, the description and statements made herein are true and correct.

Operator's Signature

Date

Telephone Number

Michael P. Shirey

7-22-03

(814) 765-1188

Please complete all Applicable Sections

Mail report to:

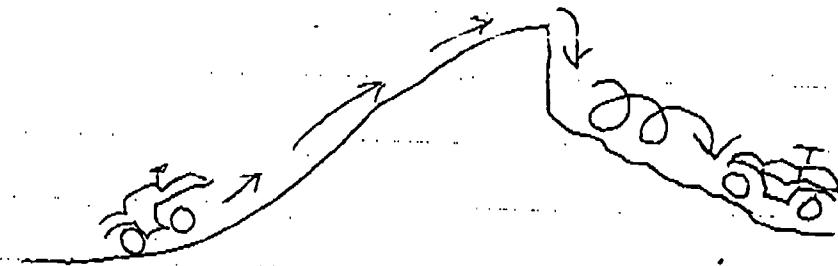
DCNR, Bureau of Forestry
Division of Operations and Recreation
Recreation Section
P.O. Box 8552
Harrisburg, PA 17105-8552

(717) 783-7941

Accident Report

⑥ , and jumped or was thrown off. Before we Rode the 4-wheeler we got permission from tyson Johnson (Reed's Son). I have road their 4-wheeler several times on their property in the past.

Mr. Johnson was unaware of our riding the machine.



M.P.D. 7-22-0

VERIFICATION

I, the undersigned, in my capacity as FPE
of allstate, Plaintiff herein, certify that the
facts set forth in the foregoing Complaint are true and correct to
the best of my knowledge or information and belief. I make this
Verification subject to the penalties of 18 Pa. C.S. Section 4904
relating to unsworn falsification to authorities, which provides
that if I knowingly make false statements, I may be subject to
criminal penalties.

Doyle Poff
Signature

Doyle Poff
Print or Type Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION LAW

ENCOMPASS INSURANCE COMPANY, *
SUBROGEE OF REED and TYSON JOHNSON, * No. 05-270-CD
*
Plaintiffs *
*
vs. * TYPE OF CASE:
* Civil Action - Law
*
MICHAEL PAUL INLOW and MICHAEL, *
INLOW and MAUREEN INLOW, PARENTS *
OF MICHAEL PAUL INLOW, *
*
Defendants * TYPE OF PLEADING:
* Certificate of Service
*
*
* FILED ON BEHALF OF:
* Defendants
*
*
* COUNSEL OF RECORD FOR
* THIS PARTY:
* David R. Thompson, Esquire
* Supreme Court I.D. No. 73053
* Attorney at Law
* P.O. Box 587
* 308 Walton Street, Suite 4
* Philipsburg PA 16866
* (814) 342-4100
*

ESW
FILED *cc*
0114081 *Atty*
APR 04 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.

CIVIL DIVISION - LAW

ENCOMPASS INSURANCE COMPANY,	*
SUBROGEE OF REED AND TYSON	*
JOHNSON,	*
Plaintiffs	NO. 05-270-CD
	*
	*
vs.	*
	*
MICHAEL PAUL INLOW and MICHAEL INLOW	*
and MAUREEN INLOW, PARENTS OF	*
MICHAEL PAUL INLOW,	*
	*
DefendantS	*

CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I, DAVID R. THOMPSON, ESQUIRE, do hereby certify that I served a true and correct copy of **PRAECIPE FOR ENTRY OF APPEARANCE**, in the above captioned matter on the following by Prepaid, First Class, United States Mail:

Robert E. Cherwony, Esquire
KRAFT & KRAFT, P.C.
1311 Spruce Street
Philadelphia, PA 19107

DATE: April 1, 2005

BY: 
David R. Thompson, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION LAW

ENCOMPASS INSURANCE COMPANY, *
SUBROGEE OF REED and TYSON JOHNSON, * No. 05-270-CD
*
Plaintiffs *
*
vs. * TYPE OF CASE:
* Civil Action - Law
*
MICHAEL PAUL INLOW and MICHAEL, *
INLOW and MAUREEN INLOW, PARENTS *
OF MICHAEL PAUL INLOW, *
*
Defendants * TYPE OF PLEADING:
* Praecipe for Entry of
* Appearance
*
* FILED ON BEHALF OF:
* Defendants
*
*
* COUNSEL OF RECORD FOR
* THIS PARTY:
* David R. Thompson, Esquire
* Supreme Court I.D. No. 73053
* Attorney at Law
* P.O. Box 587
* 308 Walton Street, Suite 4
* Philipsburg PA 16866
* (814) 342-4100
*

FILED 1cc
04/04/05 Atty
APR 04 2005
6K

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

ENCOMPASS INSURANCE COMPANY,	*
SUBROGEE OF REED AND TYSON	*
JOHNSON,	*
Plaintiffs	*
	*
VS.	*
	*
MICHAEL PAUL INLOW and	*
MICHAEL INLOW and MAUREEN	*
INLOW, PARENTS OF MICHAEL	*
PAUL INLOW,	*
DefendantS	*
	*

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance in the above-captioned matter on behalf of the
Defendants **MICHAEL PAUL INLOW and MAUREEN INLOW, PARENT OF MICHAEL
PAUL INLOW.**

Respectfully submitted,



David R. Thompson, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION LAW

ENCOMPASS INSURANCE COMPANY, *
SUBROGEE OF REED and TYSON JOHNSON, * No. 05-270-CD
*
* Plaintiffs *
*
* vs. * TYPE OF CASE:
* Civil Action - Law
*
* MICHAEL PAUL INLOW and MICHAEL, *
INLOW and MAUREEN INLOW, PARENTS *
OF MICHAEL PAUL INLOW, *
*
* Defendants * TYPE OF PLEADING:
* Answer Containing New
* Matter
*
* FILED ON BEHALF OF:
* Defendants
*
*
*
* COUNSEL OF RECORD FOR
* THIS PARTY:
* David R. Thompson, Esquire
* Supreme Court I.D. No. 73053
* Attorney at Law
* P.O. Box 587
* 308 Walton Street, Suite 4
* Philipsburg PA 16866
* (814) 342-4100
*

FILED ^{cc}
04/04/2005 ^{Atty}
APR 04 2005

W.A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

FILED
01/10:55 AM
APR 05 2005
William A. Shaw
Honorary/Clerk of Courts
2 CCA Atty Thompson

RULE RETURNABLE

RULE RETURNABLE

NOW, this 5th day of APRIL, 2005, upon consideration of the **ANSWER
CONTAINING NEW MATTER**, a Rule is hereby issued upon the Plaintiff to file a written response to the Answer Containing New Matter. Rule Returnable for written response on the 25 day of April, 2005.

NOTICE

A PETITION OR MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING MOTION FOR FINAL JUDGMENT BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PETITIONER OR MOVANT. YOU MAY LOSE 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.

COURT ADMINISTRATOR
Clearfield County Courthouse
Clearfield PA 16830
(814) 765-2641

BY THE COURT:

BY THE COURT:
Frederick Kummerow
J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

ENCOMPASS INSURANCE COMPANY,	*
SUBROGEE OF REED AND TYSON	*
JOHNSON,	*
Plaintiffs	NO. 05-270-CD
	*
	*
VS.	*
	*
MICHAEL PAUL INLOW and	*
MICHAEL INLOW and MAUREEN	*
INLOW, PARENTS OF MICHAEL	*
PAUL INLOW,	*
Defendants	*
	*

ANSWER CONTAINING NEW MATTER

AND NOW, comes the Defendants, Michael Paul Inlow and Maureen Inlow, Parent of Michael Paul Inlow, by and through their attorney David R. Thompson, Esquire, and files the following Answer Containing New Matter to Plaintiffs Complaint:

1. After reasonable investigation, Defendants are without information sufficient to form a belief as to the truth or falsity of the averment. The same is denied and strict proof is demanded at the time of trial.
2. Admitted in part and Denied in part. It is admitted that Michael Paul Inlow and Maureen Inlow, Parent of Michael Paul Inlow reside at 663 Coalhill Road, Clearfield, Pennsylvania, 16830. All other aspects of the averment are strictly denied.
3. Paragraph 3 is a conclusion of law to which no response is necessary. To the extent a response is deemed necessary, the same is strictly denied, and strict proof is demanded at the time of trial.

4. Admitted, as more fully stated in New Matter herein.

WHEREFORE, Defendants respectfully request this Honorable Court to enter judgment in their favor dismissing Plaintiffs Complaint with prejudice.

NEW MATTER

Paragraphs 1 through 4 of Defendants Answer are incorporated herein by reference as though the same were set forth at length herein.

5. Plaintiff did not keep proper care, control and possession of his all-terrain vehicle.

6. Plaintiff, through his agents, allowed the all-terrain vehicle to be operated by numerous individuals including the Defendant, Michael Paul Inlow.

7. Any damages sustained by the Plaintiffs were the result of the negligence and carelessness of Plaintiffs, and Defendants are not liable for any damages allegedly sustained.

8. Defendants plead the Doctrine of Assumption of Risk.

9. Defendants plead the Doctrine of Comparative Negligence.

10. Defendants plead the Doctrine of Contributory Negligence.

11. Defendants plead the Doctrine of Unclean Hands.

12. Plaintiffs Complaint is in violation of the applicable Statute of Limitation.

WHEREFORE, Defendants respectfully requests this Honorable Court to enter judgment in their favor and against Plaintiffs, dismissing Plaintiffs Complaint with prejudice.

Respectfully submitted,



David R. Thompson, Esquire
Attorney for Defendants

VERIFICATION

I certify that the facts set forth in the foregoing **ANSWER CONTAINING NEW MATTER** are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C. S. § 4904, relating to unsworn falsification to authorities.

Dated: 4-1-05

Maureen Inlow
Maureen Inlow

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100262
NO: 05-270-CD
SERVICE # 1 OF 3
COMPLAINT

PLAINTIFF: ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED & TYSON JOHNSON
vs.
DEFENDANT: MICHAEL PAUL INLOW and MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW

SHERIFF RETURN

NOW, March 07, 2005 AT 7:42 AM SERVED THE WITHIN COMPLAINT ON MICHAEL PAUL INLOW DEFENDANT AT 663 COALHILL ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MAURENE INLOW, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

(ESW)
FILED
0/9:30 1su
APR 11 2005

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100262
NO: 05-270-CD
SERVICE # 2 OF 3
COMPLAINT

PLAINTIFF: ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED & TYSON JOHNSON
vs.
DEFENDANT: MICHAEL PAUL INLOW and MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW

SHERIFF RETURN

NOW, March 07, 2005 AT 7:42 AM SERVED THE WITHIN COMPLAINT ON MICHAEL INLOW parent of MICHAEL PAUL INLOW DEFENDANT AT 663 COALHILL ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MAURENE INLOW, WIFE OF CHARLES INLOW A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100262
NO: 05-270-CD
SERVICE # 3 OF 3
COMPLAINT

PLAINTIFF: ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED & TYSON JOHNSON
VS.
DEFENDANT: MICHAEL PAUL INLOW and MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW

SHERIFF RETURN

NOW, March 07, 2005 AT 7:42 AM SERVED THE WITHIN COMPLAINT ON MAUREEN INLOW parent of MICHAEL PAUL INLOW DEFENDANT AT 663 COALHILL ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MAURENE INLOW, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100262
NO: 05-270-CD
SERVICES 3
COMPLAINT

PLAINTIFF: ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED & TYSON JOHNSON
vs.

DEFENDANT: MICHAEL PAUL INLOW and MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW

SHERIFF RETURN

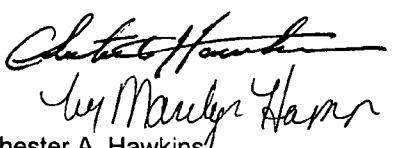
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	KRAFT	4975	30.00
SHERIFF HAWKINS	KRAFT	4975	35.50

Sworn to Before Me This

____ Day of _____ 2005

So Answers,


Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

FILED ^{1cc}
019:57.61
APR 12 2005
Amy Thompson

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED AND TRSON JONSHON	*	No. 05-270-CD
Plaintiffs	*	
	*	
VS.	*	
	*	
MICHAEL PAUL INLOW AND MICHAEL INLOW, and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW,	*	
Defendants	*	

CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I, **DAVID R. THOMPSON, ESQUIRE**, do hereby certify that I served a true and correct copy of the **ANSWER CONTAINING NEW MATTER** in the above captioned matter by depositing the same in the U.S. First Class Mail, postage prepaid, addressed as follows:

Robert E. Cherwony, Esquire
KRAFT & KRAFT, P.C.
1311 Spruce Street
Philadelphia, PA 19107

DATE: April 11, 2005

BY:



David R. Thompson, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL ACTION - LAW

ENCOMPASS INSURANCE COMPANY,
SUBROGEE OF REED AND TYSON
JOHNSON,

Plaintiffs

*

*

*

*

No. 05-270-CD

*

*

*

*

*

*

MICHAEL PAUL INLOW and,
MICHAEL INLOW and MAUREEN INLOW,
PARENTS OF MICHAEL PAUL INLOW

Defendants

*

*

*

TYPE OF PLEADING:
Praecipe to Append

*

*

FILED ON BEHALF OF:
Defendants

*

*

COUNSEL OF RECORD

FOR THIS PARTY:

David R. Thompson, Esquire

Attorney at Law

Supreme Court I.D. 73053

308 Walton Street, Suite 4

P.O. Box 587

Philipsburg PA 16866

(814) 342-4100

FILED acc
04/09/2005 Amy Thompson
APR 12 2005 (66)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL ACTION - LAW

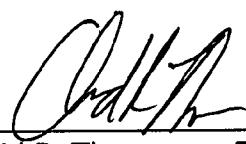
ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED AND TYSON JOHNSON,	*
	*
	*
Plaintiffs	*
	No. 05-270-CD
	*
vs.	*
	*
MICHAEL PAUL INLOW and, MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW	*
	*
	*
Defendants	*
	*

PRAECIPE TO APPEND NOTICE TO PLEAD

TO THE PROTHONOTARY:

Kindly append the attached **NOTICE TO PLEAD** to the **ANSWER CONTAINING
NEW MATTER** filed on April 4, 2005 in the above-named matter.

DATE: April 11, 2005



David R. Thompson, Esquire
Attorney for Defendants

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED AND TYSON JOHNSON,	*
	*
	*
Plaintiffs	*
	No. 05-270-CD
	*
vs.	*
	*
MICHAEL PAUL INLOW and, MICHAEL INLOW and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW	*
	*
	*
Defendants	*
	*
	*

NOTICE TO PLEAD

TO Encompass Insurance Company, Subrogee of
Reed and Tyson Johnson
c/o Robert E. Cherwony, Esquire
KRAFT & KRAFT, P.C.
1311 Spruce Street
Philadelphia, PA 19107

You are hereby notified to file a written response to the enclosed **ANSWER**
CONTAINING NEW MATTER within twenty (20) days from service hereof.

By: 

David R. Thompson, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

FILED
01/05/2005
APR 12 2005
William A. Shaw
cc
Amy Thompson
(6K)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

ENCOMPASS INSURANCE COMPANY, SUBROGEE OF REED AND TRSON JONSHON	*	No. 05-270-CD
Plaintiffs	*	
	*	
vs.	*	
	*	
MICHAEL PAUL INLOW AND MICHAEL INLOW, and MAUREEN INLOW, PARENTS OF MICHAEL PAUL INLOW,	*	
Defendants	*	
	*	

CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I, **DAVID R. THOMPSON, ESQUIRE**, do hereby certify that I served a true and correct copy of the **PRAECIPE TO APPEND NOTICE TO PLEAD to the ANSWER CONTAINING NEW MATTER** filed on April 4, 2005, in the above captioned matter by depositing the same in the U.S. First Class Mail, postage prepaid, addressed as follows:

Robert E. Cherwony, Esquire
KRAFT & KRAFT, P.C.
1311 Spruce Street
Philadelphia, PA 19107

DATE: April 11, 2005

BY: 

David R. Thompson, Esquire

Notice of Proposed Termination of Court Case

January 22, 2010

RE: 2005-270-CD

Encompass Insurance Company et al
Vs.
Michael Paul Inlow et al

Dear Robert E. Cherwony, Esq.

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **March 23, 2010**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



Daniel J. Nelson
Court Administrator

5
0185504
BCH

Notice of Proposed Termination of Court Case

January 22, 2010

RE: 2005-270-CD

Encompass Insurance Company et al
Vs.
Michael Paul Inlow et al

Dear David R. Thompson, Esq.

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **March 23, 2010**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



Daniel J. Nelson
Court Administrator

Notice of Proposed Termination of Court Case

February 1, 2012

RE: 2005-00270-CD

Encompass Insurance Company
Reed Johnson
Tyson Johnson

Vs.

Michael Paul Inlow
Michael Inlow
Maureen Inlow

FILED
FEB 01 2012
William A. Shaw
Prothonotary/Clerk of Courts

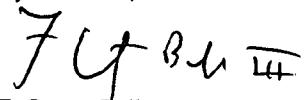
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830. The Statement of Intention to Proceed must be filed on or before April 2, 2012.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



F. Cortez Bell, III, Esq.
Court Administrator

Court of Common Pleas of Clearfield County, Pennsylvania
Civil Division

Encompass Insurance Company
Reed Johnson
Tyson Johnson

Vs.

2005-00270-CD

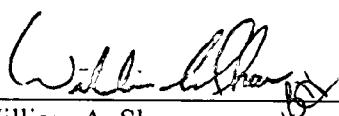
Michael Paul Inlow
Michael Inlow
Maureen Inlow

FILED

JUL 27 2012 61K
BRY William A. Shaw
Prothonotary/Clerk Court

Termination of Inactive Case

This case is hereby terminated with prejudice this July
27, 2012, as per Rule 230.2



William A. Shaw
Prothonotary