

05-402-CD
H. Maines vs. Douglas S. Perkins

2005-402-CD
Heather Maines v. Douglas Perkins

Date: 5/29/2008

Clearfield County Court of Common Pleas

User: LMILLER

Time: 11:39 AM

ROA Report

Page 1 of 2

Case: 2005-00402-CD

Current Judge: Fredric Joseph Ammerman

Heather L. Maines vs. Douglas S. Perkins

Civil Other

Date	Judge
3/22/2005	New Case Filed.
	Filing: Praeclipe for Writ of Summons Paid by: Naddeo, James A. (attorney for Maines, Heather L.) Receipt number: 1897857 Dated: 03/22/2005 Amount: \$85.00 (Check) No cert. copies. 1 Writ issued to Sheriff.
4/19/2005	Sheriff Return, March 28, 2005 Served The Within Summons On Douglas S. Perkins. So Answers Chester A. Hawkins, Sheriff by s/Marilyn Hamm.
4/22/2005	Praeclipe For Entry of Appearance, filed on behalf of Defendant, enter O'Malley & Magley, L.L.P. as counsel of record. Filed by s/ Stephen J. Magley, Esquire. No CC
4/25/2005	Praeclipe For Rule To File Complaint, filed by s/ Stephen J. Magley, Esquire. No CC, 1 Rule to Atty Magley
5/31/2005	Complaint, filed by s/ James A. Naddeo, Esquire. 1CC Atty Naddeo
7/11/2005	Answer and New Matter filed by Stephen J. Magley Esquire. 1CC Atty. Naddeo
8/10/2005	Notice of Service of Interrogatories and Request for Production of Documents Directed to the Plaintiff were served upon counsel for Plaintiff, James A. Naddeo Esquire on August 8, 2005 filed by s/ Stephen J. Magley Esquire. No CC.
10/24/2005	Answer to New Matter, filed by s/ James A. Naddeo Esq. No CC.
	Certificate of Service, filed. That a certified copy of Answers to Interrogatories was served on Stephen J. Magley Esq. on October 24, 2005 filed by s/ James A. Naddeo Esq. 1CC Atty.
	Certificate of Service, filed. That a certified copy of Answers to Request for Production of Documents was served on Stephen J. Magley Esq. on October 24, 2005 filed by s/ James A. Naddeo Esq. 1CC Atty.
3/16/2006	Certificate of Service, filed. That a certified copy of Interrogatories Addressed to Defendant was served on Stephen J. Magley Esq. on the 16th day of March, 2006, filed by s/ James A. Naddeo. 1CC Atty Naddeo.
7/17/2006	Notice of Service, filed. That Answers to Interrogatories were served upon Counsel for Plaintiff, James A. Naddeo Esq., on the 14th day of July 2006, filed by s/ Stephen J. Magley Esq. No CC.
9/12/2007	Praeclipe For Status Conference, filed by s/ James A. Naddeo, Esquire. No CC
9/17/2007	Scheduling Order, this 14th day of Sept. 2007, it is Ordered that Status Conference is scheduled for the 26th of Oct., 2007, at 10:30 a.m. in Chambers. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Atty. Naddeo
9/19/2007	Certificate of Service, filed. That a certified copy of Praeclipe for Status Conference and Scheduling Order was served on Kevin R. O'Malley Esq on the 19th day of September 2007, filed by s/ James A. Naddeo Esq. No CC.
10/31/2007	Order, this 31st day of Oct., following status conference with counsel for the Plaintiff, the Court hereby issues the following case management Order: (see original). By The court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Atty. Naddeo; 1CC Atty: Magley, O'Malley, and Carone
12/3/2007	Notice of Service of Defendant's Supplemental Request for Production of Documents Directed to James A. Naddeo on this 29th day of November 2007, filed by s/ Stephen J. Magley Esq. No CC.

Date: 4/1/2008
Time: 01:23 PM
Page 1 of 2

Clearfield County Court of Common Pleas

ROA Report
Case: 2005-00402-CD

User: GLKNISLEY

Current Judge: Fredric Joseph Ammerman

Heather L. Maines vs. Douglas S. Perkins

Civil Other

Date	Judge
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10/31/2007	Order, this 31st day of Oct., following status conference with counsel for the Fredric Joseph Ammerman Plaintiff, the Court hereby issues the following case management Order: (see original). By The court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Atty. Naddeo; 1CC Atty: Magley, O'Malley, and Carone
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Date: 5/29/2008

Time: 11:39 AM

Page 2 of 2

Clearfield County Court of Common Pleas

User: LMILLER

ROA Report

Case: 2005-00402-CD

Current Judge: Fredric Joseph Ammerman

Heather L. Maines vs. Douglas S. Perkins

Civil Other

Date	Judge
12/19/2007	Certificate of Service, filed. That a copy of Plaintiff's Answers to Defendant's Supplemental Request for Production of Documents Dated to Plaintiffs were served on the 19th day of December 2007 by first class mail to Kevin R. O'Malley Esq., filed by s/ James A. Naddeo Esq. No CC. Fredric Joseph Ammerman

Date: 4/1/2008
Time: 01:23 PM
Page 2 of 2

Clearfield County Court of Common Pleas

ROA Report
Case: 2005-00402-CD

User: GLKNISLEY

Current Judge: Fredric Joseph Ammerman

Heather L. Maines vs. Douglas S. Perkins

Civil Other

Date	Judge
12/19/2007	Fredric Joseph Ammerman

Certificate of Service, filed. That a copy of Plaintiff's Answers to Defendant's Supplemental Request for Production of Documents Dated to Plaintiffs were served on the 19th day of December 2007 by first class mail to Kevin R. O'Malley Esq., filed by s/ James A. Naddeo Esq. No CC.

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Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
PLATE # TTY OH 43064	
Postage	\$ 0.37
Certified Fee	\$ 2.30
Return Receipt Fee (Endorsement Required)	\$ 0.30
Restricted Delivery Fee (Endorsement Required)	\$ 3.50
Total Postage & Fees	\$ 7.92
	03/24/2005
<i>Sent To</i>	
DOUGLAS S. PERKINS	
Street, Apt. No., or PO Box No. / OCLC, 6565 Frantz Road	
City, State, ZIP+4 Dublin, OH 43064	
PS Form 3800, June 2002	
See Reverse for Instructions	

*ADDRESSEE
ONLY*

Certified Mail Provides:

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**IMPORTANT: Save this receipt and present it when making an inquiry.
Internet access to delivery information is not available on mail
addressed to APOs and FPOs.**

928001

SEE

R: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DOUGLAS S. PERKINS
c/o OCLC,
6565 Frantz Road
Dublin, OH 43064

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

Aaron Smith

C. Date of Delivery

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail

Registered

Return Receipt for Merchandise

Insured Mail

C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. Article Number

(Transfer from service label)

7003 3110 0001 9380 0572

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

CHESTER A. HAWKINS
SHERIFF OF CLEARFIELD COUNTY
1 N. 2nd St. Suite 116
CLEARFIELD, PA. 16830

100326

02

|||||

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,
Defendant.

*

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No. 05 - 402 - CD

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* Type of Pleading:

*

* PRAECIPE FOR WRIT
* OF SUMMONS

*

* Filed on behalf of:
* Plaintiff

*

* Counsel of Record for
* this party:

*

*

* James A. Naddeo, Esq.
* Pa I.D. 06820

*

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED No CC
01/10/2005 Attypd 8500
MAR 22 2005
William A. Shaw
Prothonotary/Clerk of Courts
1 Writ issued
to ~~Shaw~~ Shif

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

COPY

SUMMONS

Heather L. Maines

Vs.

NO.: 2005-00402-CD

Douglas S. Perkins

TO: **DOUGLAS S. PERKINS**

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: 03/22/2005

William A. Shaw
Prothonotary

Issuing Attorney:

James A. Naddeo
P.O. Box 552
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100326
NO: 05-402-CD
SERVICE # 1 OF 1
SUMMONS

PLAINTIFF: HEATHER L. MAINES
vs.
DEFENDANT: DOUGLAS S. PERKINS

SHERIFF RETURN

NOW, March 28, 2005 SERVED THE WITHIN SUMMONS ON DOUGLAS S. PERKINS DEFENDANT AT "Addressee Only" to c/o OCLC, 6565 FRANTZ ROAD, DUBLIN, OH, 43064 BY CERTIFIED MAIL # 7003 3110 0001 9380 0572. THE RETURN RECEIPT IS HERETO ATTACHED ENDORSED BY AARON SMITH.

u/s **FILED**
03/07/05
APR 19 2005

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NADDEO	17082	10.00
SHERIFF HAWKINS	NADDEO	17082	26.29

Sworn to Before Me This

____ Day of _____ 2005

So Answers,

Chester A. Hawkins
by Marilyn Hahn
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

HEATHER MAINES

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

CIVIL DIVISION

NO. 2005-00402-CD

PRAECIPE FOR APPEARANCE

Filed on behalf of Defendant,
DOUGLAS S. PERKINS.

COUNSEL OF RECORD FOR THIS
PARTY:

Kevin R. O'Malley, Esq.
Pa I.D. #65976

Stephen J. Magley, Esq.
Pa I.D. #59990

Annabelle L. Carone, Esq.
Pa I.D. #83178

O'Malley & Magley, L.L.P.
5280 Steubenville Pike
Pittsburgh, PA 15205

(412) 788-1200

FILED ^{6K}
m/a:40.84
APR 22 2005
NO CC

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within documents were served this 20th day of April, 2005, by United States first class mail, postage prepaid upon the following:

James A. Naddeo, Esquire
P.O. Box 552
Clearfield, PA 16830

O'MALLEY & MAGLEY, L.L.P.

S.J. Magley
Stephen J. Magley, Esq.
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

PRAECIPE FOR RULE TO
FILE COMPLAINT

DOUGLAS S. PERKINS,

Defendant.

Filed on behalf of Defendant,
DOUGLAS S. PERKINS.

COUNSEL OF RECORD FOR
THIS
PARTY:

Kevin R. O'Malley, Esq.
Pa I.D. #65976

Stephen J. Magley, Esq.
Pa I.D. #59990

Annabelle L. Carone, Esq.
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O'Malley & Magley, L.L.P.
5280 Steubenville Pike
Pittsburgh, PA 15205

(412) 788-1200

FILED ¹⁶
APR 22 2005 1 Rule to
William A. Shaw
Prothonotary/Clerk of Courts

Any Magley

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

PRAECIPE FOR RULE TO FILE COMPLAINT

TO: Prothonotary

Kindly issue a Rule upon Plaintiff to file a Complaint in this action or suffer a
Judgment of Non Pros.

Respectfully submitted,

O'Malley and Magley, L.L.P.

By: SG Magley
Stephen J. Magley, Esq.
Attorney for Defendant.

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

Heather L. Maines

Vs.
Douglas S. Perkins

Case No. 2005-00402-CD

RULE TO FILE COMPLAINT

TO: Heather Maines

YOU ARE HEREBY RULED to file a Complaint in the above-captioned matter within twenty (20) days from service hereof, or a judgment of non pros may be entered against you.

William A. Shaw, Prothonotary

Dated: April 22, 2005

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

* No. 05 - 402 - CD

* Type of Pleading:

* COMPLAINT

* Filed on behalf of:

* Plaintiff

* Counsel of Record for
this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED @
03-27-05 AMY
MAY 31 2005 Naddeo

William A. Shaw
Prothonotary/Clerk of Courts

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

Defendants.

*

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*

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No. 05 - 402 - CD

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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 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
Market and Second Streets
Clearfield, PA 16830

(814) 765-2641, ext. 5982

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

HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

COMPLAINT

NOW COMES the Plaintiff, Heather L. Maines, and by her attorney, James A. Naddeo, Esquire, sets forth the following:

1. That the Plaintiff is Heather L. Maines, an adult individual, who resides at 18 Bills Road, Clearfield, Pennsylvania 16830.

2. That the Defendant is Douglas S. Perkins, an adult individual, who resides at c/o OCLO, 6565 Frantz Road, Dublin, Ohio 43064.

3. That on or about August 10, 2003 and at or about 5:30 p.m., the Plaintiff, Heather Maines, was a passenger in the right first rear seat of a 1985 Ford Econoline Van bearing Pennsylvania Registration Plate No. DYZ1708 which vehicle was owned and operated by Darlene Maines.

4. That on or about the said day and at or about the said time, the Defendant, Douglas S. Perkins, was the operator of a 1994 Honda Civic bearing Ohio registration plates.

5. That Pennsylvania Route 879 is a two-lane macadam highway.

6. That Pennsylvania Route 870 intersects with Interstate 80 Off Ramp Exit No. 120 which is controlled by a stop sign at a point approximately one mile east of the Borough of Clearfield, Clearfield County, Pennsylvania.

7. That on or about the said day and at or about the said time, the weather was clear and the roadway was dry.

8. That on or about the said day and at or about the said time, the vehicle in which the Plaintiff was a passenger was proceeding East on Pennsylvania Route 879 where it had reached a point adjacent to Interstate 80 Off Ramp Exit 120.

9. That on or about the said day and at or about the said time, the vehicle in which the Plaintiff was a passenger slowed to permit a third automobile to exit Interstate 80 and enter upon Route 879.

10. That on or about the said day and at or about the said time, the Defendant, Douglas S. Perkins, was existing Interstate 80 when he suddenly and without warning struck the right mid-section of the vehicle in which the Plaintiff was a

passenger with the left front of the vehicle which he was operating.

11. That as a result of the collision described herein, the Plaintiff, Heather L. Maines, was thrown generally sideways and backwards within the vehicle in which she a passenger causing the numerous and serious injuries hereinafter set forth.

12. That the Defendant, Douglas S. Perkins, was guilty of the following negligence, recklessness and carelessness which was the proximate cause of the accident and the injuries to the Plaintiff, Heather L. Maines, as follows:

A. That the Defendant failed to have his vehicle under proper control;

B. That the Defendant failed to maintain a proper lookout;

C. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3714, 75 Pa. C.S.A. Section 3174 and supplements thereto in that he operated his vehicle upon State Route 879 with careless disregard for the safety of the Plaintiff, Heather L. Maines.

E. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3736, 75 Pa. C.S.A. Section 3736, and supplements thereto,

in that he operated his vehicle upon State route 879 in willful or wanton disregard for the safety of the person or property of the Plaintiff, Heather L. Maines.

F. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3323, 75 Pa. C.S.A. Section 3323, and supplements thereto, in that he failed to stop at an intersection controlled by a stop sign.

G. That the Defendant violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3321 (b) (1) 75 Pa. C.S.A. Section 3321 (b) (1), and supplements thereto, in that the Defendant failed to yield the right of way to the vehicle in which the Plaintiff was a passenger.

H. That the Defendant, Douglas S. Perkins, was negligent, careless and reckless in that he failed to use due care under all circumstances of the case.

13. That as a result of the collision described in Paragraph 10 hereof, the Plaintiff, Heather L. Maines, suffered the following injuries which may and probably will be permanent:

- A. Hyperextension/Hyperflexion injury;
- B. Sprain/Strain Cervical Spine;
- C. Cervical Muscle Spasm;

D. Cervical Myalgia and/or Myositis;

E. Sprain/Strain - Lumbar Spine;

F. Lumbar Myalgia and/or Myositis.

14. That as a result of the injuries referred to in Paragraph 13 hereof, the Plaintiff, Heather L. Maines, has been unable to engage in her regular hobbies since the time of the accident up to and including the filing of this complaint and will be unable to do so for an indefinite period of time in the future.

15. That as a result of the injuries referred to in Paragraph 13 hereof, the Plaintiff, Heather L. Maines, may incur medical expenses for the treatment of her injuries in excess of her available first party medical benefits.

16. That the Plaintiff, Heather L. Maines, claims a reasonable amount for the following:

A. Pain and suffering: past, present and future;

B. Privation and inconvenience: past, present and future;

C. Future medical expenses;

D. Lost wages;

E. Impairment of earning power;

F. All other damages allowable by law.

WHEREFORE, the Plaintiff, Heather L. Maines, claims damages from the Defendant, Douglas S. Perkins, in excess of Twenty Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.

James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

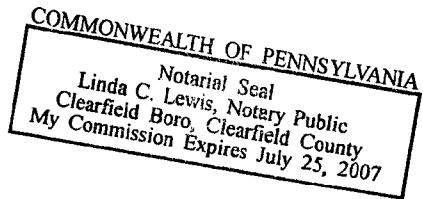
COMMONWEALTH OF PENNSYLVANIA)
 ss.
COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared HEATHER L. MAINES, being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.



Heather L. Maines

SWORN and SUBSCRIBED before me this 23rd day of May, 2005.



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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

*

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* No. 05 - 402 - CD

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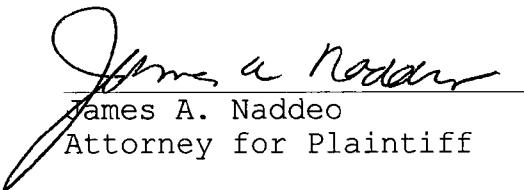
*

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Complaint was served on the following and in the following manner on the 31st day of May, 2005:

First-Class Mail, Postage Prepaid

Stephen J. Magley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205


James A. Naddeo
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

ANSWER AND NEW MATTER

Defendant.

Filed on behalf of Defendant,
DOUGLAS S. PERKINS.

COUNSEL OF RECORD FOR
THIS
PARTY:

Kevin R. O'Malley, Esq.
Pa I.D. #65976

Stephen J. Magley, Esq.
Pa I.D. #59990

Annabelle L. Carone, Esq.
Pa I.D. #83178

O'Malley & Magley, L.L.P.
5280 Steubenville Pike
Pittsburgh, PA 15205

(412) 788-1200

FILED
M 11 14 2005
NO. 2005-00402-CD
JUL 11 2005
S

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

ANSWER AND NEW MATTER

AND NOW, comes the Defendant, DOUGLAS S. PERKINS, by and through his attorneys, O'Malley and Magley, L.L.P. and files the following Answer and New Matter and in support thereof avers as follows:

1. The averments of Paragraphs one are denied according to Pa. R.C.P. 1029 (e).
2. The averments of Paragraph two are denied as stated. To the contrary, the proper address for Douglas S. Perkins is 489 Piedmont Road, Columbus, Ohio.
3. The averments of Paragraph three are denied according to Pa. R.C.P. 1029 (e).
4. The averments of paragraph four are admitted in part and denied in part. It is admitted that Defendant was driving a 1994 Honda vehicle with Ohio registration plates at the time mentioned, however, the vehicle was a Honda Accord not a Honda Civic as indicated in Plaintiff's Complaint.

5. After reasonable investigation, the Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraphs five and six of Plaintiff's Complaint.
6. The averments of Paragraphs seven through eleven are denied according to Pa. R.C.P. 1029 (e).
7. Defendant is advised and therefore avers that the averments of Paragraph twelve, including subparagraphs (a) through (h), contain conclusions of law to which no response is required. If a response were required, the averments of this paragraph are denied according to Pa. R.C.P. 1029 (e).
8. Defendant is advised and therefore avers that the averments of Paragraph thirteen, including subparagraphs (a) through (f), contain conclusions of law to which no response is required. If a response were required, the averments of this paragraph are denied according to Pa. R.C.P. 1029 (e).
9. The averments of paragraphs fourteen through sixteen are denied according to Pa. R.C.P. 1029 (e).

WHEREFORE, Defendant, DOUGLAS S. PERKINS, denies any and all liability to Plaintiff and demand judgment in his favor together with costs and fees as this Court deems just and proper.

NEW MATTER

10. If applicable based upon facts developed through discovery or at the time of trial, this Defendant hereby avers that the Causes of Action and injuries Plaintiff claims, occurred more than 2 years before this action was filed and are precluded by the

provisions of 42 Pa. R.C.P. Section 5524, et seq., as amended and other applicable Statutes of Limitation.

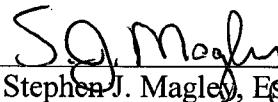
11. This Defendant is advised and therefore avers that Plaintiff selected or is bound by limited tort option of the applicable insurance policies and is precluded from maintaining any action according to the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law set forth at 75 Pa. C.S.A. Section 1701, et seq., as amended and the applicable insurance policies.

12. This Defendant hereby sets forth the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law set forth at 75 Pa. C.S.A., Section 1701, et seq., as amended as an affirmative defense to any and all claims of the Plaintiff in this action.

WHEREFORE, Defendant, DOUGLAS S. PERKINS, requests judgment in his favor together with costs and fees as this Court deems just and proper.

Respectfully submitted,

O'Malley & Magley, L.L.P.

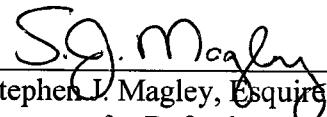
By: 
Stephen J. Magley, Esquire
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within documents were served this 7th day of July, 2005, by United States first class mail, postage prepaid upon the following:

James A. Naddeo, Esquire
P.O. Box 552
Clearfield, PA 16830

O'MALLEY & MAGLEY, L.L.P.


Stephen J. Magley, Esquire
Attorney for Defendant
5280 Steubenville Pike
Pittsburgh, PA 15205
412-788-1200

VERIFICATION

I, DOUGLAS S. PERKINS, have read the foregoing ANSWER AND NEW MATTER. The statements of fact contained therein are true and correct to the best of my personal knowledge, information and belief.

This statement and verification is made subject to the penalties of 18 PA. C.S. Section 4904 relating to unsworn falsification to authorities which provides that if I make knowingly false averments, I may be subject to criminal penalties.

Date: 2005-01-27



DOUGLAS S. PERKINS

DU
FILED NO CC
AUG 12 2005
AUG 10 2005 JN

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

NOTICE OF SERVICE OF
INTERROGATORIES AND
REQUEST FOR PRODUCTION
OF DOCUMENTS DIRECTED
TO THE PLAINTIFF

Filed on behalf of Defendant,
DOUGLAS S. PERKINS.

COUNSEL OF RECORD FOR
THIS
PARTY:

Kevin R. O'Malley, Esq.
Pa I.D. #65976

Stephen J. Magley, Esq.
Pa I.D. #59990

Annabelle L. Carone, Esq.
Pa I.D. #83178

O'Malley & Magley, L.L.P.
5280 Steubenville Pike
Pittsburgh, PA 15205

(412) 788-1200

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

NOTICE OF SERVICE OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE PLAINTIFF

TO: PROTHONOTARY

AND NOW, comes the Defendant, DOUGLAS S. PERKINS, by and through his attorneys, O'MALLEY and MAGLEY, LLP and certifies that Interrogatories and Requests for Production of Documents Directed to the Plaintiff were served upon counsel for Plaintiff, James A. Naddeo, Esquire, P.O. Box 552, Clearfield, PA 16830, by United States mail, postage pre-paid this 8th day of August, 2005.

O'MALLEY AND MAGLEY, L.L.P.

By: _____

S. J. Magley
Stephen J. Magley, Esq.
Attorney for Defendant

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

*

*

*

*

No. 05 - 402 - CD

*

*

*

*

*

Type of Pleading:

*

ANSWER TO NEW MATTER

*

*

Filed on behalf of:

*

Plaintiff

*

*

Counsel of Record for

*

this party:

*

*

James A. Naddeo, Esq.

*

Pa I.D. 06820

*

*

207 East Market Street

*

P.O. Box 552

*

Clearfield, PA 16830

*

(814) 765-1601

FILED
OCT 24 2005
10:39 AM
William A. Shaw
Prothonotary/Clerk of Courts

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

HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

ANSWER TO NEW MATTER

NOW COMES the Plaintiff, Heather L. Maines, and by her attorney, James A. Naddeo, Esquire, sets forth the following:

10. No answer required. To the extent that an answer may be required, it is specifically denied that Plaintiff's cause of action occurred more than two years prior to the filing of suit.

11. States a conclusion of law to which no answer may be required. To the extent that an answer may be required, it is specifically denied that Plaintiff is bound by a limited tort option but to the contrary had full tort at the time of the accident.

12. States a conclusion of law to which no answer is required.

WHEREFORE, Plaintiff claims damage as set forth in her

Complaint.



James A. Naddeo
Attorney for Plaintiff

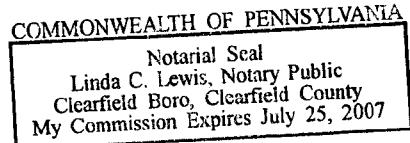
COMMONWEALTH OF PENNSYLVANIA)
ss.
COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared HEATHER MAINES, who being duly sworn according to law, depose and state that the facts set forth in the foregoing Answer to New Matter are true and correct to the best of her knowledge, information and belief.

Heather Maines
Heather Maines

SWORN and SUBSCRIBED before me this 11th day of October, 2005.

Linda C. Lewis



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

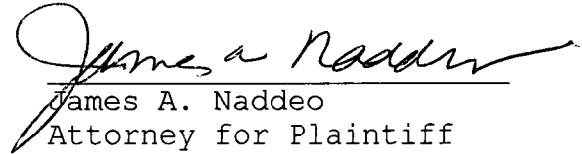
HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Answer to New Matter was served on the following and in the following manner on the 24th day of October, 2005:

First-Class Mail, Postage Prepaid

Stephen J. Magley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205



James A. Naddeo
Attorney for Plaintiff

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

* No. 05 - 402 - CD

* Type of Pleading:

* CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED 1cc
010-3931-44y
12/24/2005

John A. Shaw
Commonwealth/Clerk of Courts

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

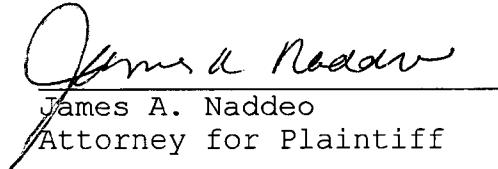
HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Answers to Interrogatories was served on the following and in the following manner on the 24th day of October, 2005:

First-Class Mail, Postage Prepaid

Stephen J. Magley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205



James A. Naddeo
Attorney for Plaintiff

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

* No. 05 - 402 - CD

* Type of Pleading:

* CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED
10:39 AM
OCT 24 2005
Atty
cc

William A. Shaw
Prothonotary/Clerk of Courts

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

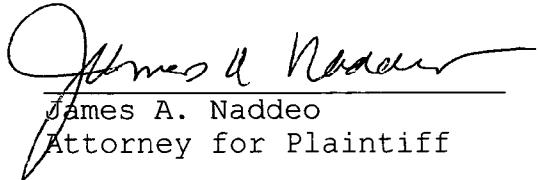
HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Answers to Request for Production of Documents was served on the following and in the following manner on the 24th day of October, 2005:

First-Class Mail, Postage Prepaid

Stephen J. Magley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205



James A. Naddeo
Attorney for Plaintiff

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,
Defendant.

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* Type of Pleading:

*

* CERTIFICATE OF SERVICE

*

*

* Filed on behalf of:

* Plaintiff

*

* Counsel of Record for
* this party:

*

*

* James A. Naddeo, Esq.
* Pa I.D. 06820

*

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED ^{ICC}
03/35/06
MAR 16 2006
Atty Naddeo
WAS

William A. Shaw
Prothonotary/Clerk of Courts

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

HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Interrogatories Addressed to Defendant was served on the following and in the following manner on the 16th day of March, 2006:

First-Class Mail, Postage Prepaid

Stephen J. Magley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205

James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

FILED NO cc
M113761
JUL 17 2006
X

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES

TO: PROTHONOTARY

AND NOW, comes the Defendant, DOUGLAS S. PERKINS, by and through his attorneys, O'MALLEY and MAGLEY, LLP and certifies that Answers to Interrogatories were served upon counsel for Plaintiff, James A. Naddeo, Esquire, P.O. Box 552, Clearfield, PA 16830, by United States mail, postage pre-paid this 14th day of July, 2006.

O'MALLEY AND MAGLEY, L.L.P.

By: Stephen J. Magley

Stephen J. Magley, Esquire
Attorney for Defendant

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,
Defendant.

* No. 05 - 402 - CD

* Type of Pleading:

* PRAECIPE FOR STATUS
CONFERENCE

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

O 10:51 a.m. 6K
SEP 12 2007

cc to Atty.

William A. Shaw
Prothonotary/Clerk of Courts

(6K)

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

*
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*
*

No. 05 - 402 - CD

PRAECIPE FOR STATUS CONFERENCE

Please schedule a status conference in the above-captioned case.

James A. Naddeo

James A. Naddeo
Attorney for Plaintiffs

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

*

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No. 05 - 402 - CD

*

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*

* Type of Pleading:

*

* SCHEDULING ORDER

*

*

* Filed on behalf of:

* Plaintiff

*

* Counsel of Record for
* this party:

*

*

* James A. Naddeo, Esq.

* Pa I.D. 06820

*

* 207 East Market Street

* P.O. Box 552

* Clearfield, PA 16830

* (814) 765-1601

FILED
OCT 10 2007
SEP 17 2007
Atty Naddeo
JK

William A. Shaw
Prothonotary/Clerk of Courts

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

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*
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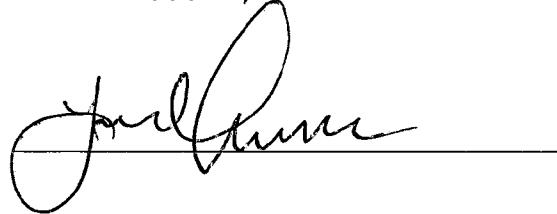
No. 05 - 402 - CD

O R D E R

AND NOW, this 14 day of Sept, 2007, it is the
ORDER of this Court that a Status Conference is scheduled for
the 26th day of October, 2007, at 10:30 A.M. in Chambers

, Clearfield County Courthouse, Clearfield,
Pennsylvania.

BY THE COURT,



FILED

SEP 17 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 9/17/07

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

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

HEATHER L. MAINES, an
individual,

Plaintiff,

vs.

DOUGLAS S. PERKINS,

Defendant.

*

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* No. 05 - 402 - CD

*

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*

*

*

* Type of Pleading:

*

* CERTIFICATE OF

• SERVICE

•

* Filed on behalf of:

* Plaintiff

*

* Counsel of Record for

* this party:

*

*

* James A. Naddeo, Esq.

* Pa I.D. 06820

*

* 207 East Market Street

* P.O. Box 552

* Clearfield, PA 16830

* (814) 765-1601

FILED

SEP 19 2001

8/11/01 (JM)

William A. Shaw

Prothonotary/Clerk of Courts

W.C.C.

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

HEATHER L. MAINES, an *
individual, *
Plaintiff, *
*
vs. * No. 05 - 402 - CD
*
DOUGLAS S. PERKINS, *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Praecipe for Status Conference and Scheduling Order was served on the following and in the following manner on the 19th day of September, 2007:

First-Class Mail, Postage Prepaid

Kevin R. O'Malley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205



James A. Naddeo
Attorney for Plaintiff

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

HEATHER L. MAINES, an individual, Plaintiff	*	*
vs.	*	NO. 05-402-CD
DOUGLAS S. PERKINS, Defendant	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife, and Parents and Natural Guardians of JONATHAN MAINES, a minor, Plaintiffs	*	*
vs.	*	NO. 05-403-CD
DOUGLAS S. PERKINS, Defendant	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife, and Parents and Natural Guardians of HARLEY MAINES, a minor, Plaintiffs	*	*
vs.	*	NO. 05-404-CD
DOUGLAS S. PERKINS, Defendant	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife, and Parents and Natural Plaintiffs	*	*
vs.	*	NO. 05-405-CD
DOUGLAS S. PERKINS, Defendant	*	

FILED
OCT 31 2007

ORDER

6K
NOW, this 31st day of October, 2007, following status conference with counsel for the Plaintiff, the Court hereby issues the following case management ORDER:

1. The Defendant, Douglas S. Perkins, shall make himself available for a deposition within no more than sixty (60) days from this date. The date, time and place of the deposition shall be determined by counsel for the Plaintiff;

2. The Defense shall advise the Plaintiffs within no more than thirty (30) days from this date if the Defense wishes to conduct an independent medical examination on the Plaintiff. Failure to properly advise, in writing, within the said thirty (30)

William A. Shaw
Prothonotary/Clerk of Courts

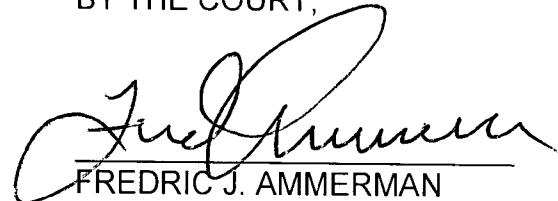
cc Atty Nadeo

1cc Atty Magley,
O'Malley, and
Carone

days shall result in the Defendant waiving any right to an independent medical examination;

3. All other discovery shall be completed by no later than March 1, 2008;
4. This case shall be listed for Jury Trial for the Spring Term of Civil Court, 2008;
5. Jury selection shall be on April 3, 2008 at 9:00 a.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania;
6. The above-captioned cases filed against the Defendant are hereby consolidated.
7. The Court notes that counsel for the Defendant failed to appear for the status conference.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED

OCT 31 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 10/31/07

 You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

 Plaintiff(s) Plaintiff(s) Attorney Other

 Defendant(s) Defendant(s) Attorney Other

 Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

NOTICE OF SERVICE OF
SUPPLEMENTAL REQUEST
FOR PRODUCTION OF
DOCUMENTS DIRECTED TO
PLAINTIFF

Filed on behalf of Defendant,
DOUGLAS S. PERKINS.

COUNSEL OF RECORD FOR
THIS
PARTY:

Kevin R. O'Malley, Esq.
Pa I.D. #65976

Stephen J. Magley, Esq.
Pa I.D. #59990

Annabelle L. Carone, Esq.
Pa I.D. #83178

O'Malley & Magley, L.L.P.
5280 Steubenville Pike
Pittsburgh, PA 15205

(412) 788-1200

FILED NO CC
M 10:56 AM
DEC 03 2007
JUN

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HEATHER MAINES

CIVIL DIVISION

Plaintiff,

NO. 2005-00402-CD

vs.

DOUGLAS S. PERKINS,

Defendant.

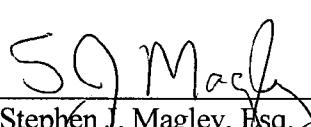
NOTICE OF SERVICE OF DEFENDANT'S SUPPLEMENTAL REQUEST
FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE PLAINTIFF

TO: PROTHONOTARY

AND NOW, comes the Defendant, DOUGLAS S. PERKINS, by and through his attorneys, O'MALLEY and MAGLEY, LLP and certifies that Defendant's Supplemental Requests for Production of Documents Directed to the Plaintiff were served upon counsel for Plaintiff, James A. Naddeo, Esquire, P.O. Box 552, Clearfield, PA 16830, by United States mail, postage pre-paid this 29th day of November, 2007.

O'MALLEY AND MAGLEY, L.L.P.

By: _____


Stephen J. Magley, Esq.
Attorney for Defendant

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

HEATHER L. MAINES, an individual, Plaintiff,	*	
vs.	*	
DOUGLAS S. PERKINS, Defendant	*	No. 05 - 402 - CD
	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife, and Parents and Natural Guardians of JONATHAN MAINES, a minor,	*	
Plaintiffs	*	
vs.	*	
DOUGLAS S. PERKINS, Defendant	*	No. 05 - 403 - CD
	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife, and Parents and Natural Guardians of HARLEY MAINES, a minor,	*	
Plaintiffs	*	
vs.	*	
DOUGLAS S. PERKINS, Defendant	*	No. 05 - 404 - CD
	*	<i>Consolidated with</i>
<hr/>		
WADE A. MAINES and DARLENE A. MAINES, Husband and Wife,	*	
Plaintiffs	*	
vs.	*	
DOUGLAS S. PERKINS, Defendant	*	No. 05 - 405 - CD
	*	

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Plaintiff's Answers to Defendant's Supplemental Request for Production of Documents Directed to Plaintiffs were served on the following and in the following manner on the 19th day of December, 2007:

FILED NO CC
0134161
DEC 19 2007
WM

William A. Shaw
Prothonotary/Clerk of Courts

First-Class Mail, Postage Prepaid

Kevin R. O'Malley, Esquire
O'Malley and Magley, LLP
5280 Steubenville Pike
Pittsburgh, PA 15205

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

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

HEATHER L. MAINES, an individual, *
Plaintiff, *
vs. * No. 05 - 402 - CD

DOUGLAS S. PERKINS, *
Defendant * Consolidated with

WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, and Parents and *
Natural Guardians of JONATHAN MAINES, *
a minor, *

Plaintiffs *
vs. * No. 05 - 403 - CD
DOUGLAS S. PERKINS, *
Defendant * Consolidated with

WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, and Parents and *
Natural Guardians of HARLEY MAINES, *
a minor, *

Plaintiffs *
vs. * No. 05 - 404 - CD
DOUGLAS S. PERKINS, *
Defendant * Consolidated with

WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, *

Plaintiffs *
vs. * No. 05 - 405 - CD
DOUGLAS S. PERKINS, *
Defendant *

**PRAECIPE TO SETTLE AND
DISCONTINUE**

* Filed on behalf of:

* Plaintiffs *

* Counsel of Record for
this party:

* James A. Naddeo, Esq.
Pa I.D. 06820 *

* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601 *

FILED 100-2 Cert.
07/10/2008 of Disc. to
JUN 02 2008 Atty Naddeo
William A. Shaw
Prothonotary/Clerk of Courts

Dated: June 2, 2008

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

HEATHER L. MAINES, an individual, *
Plaintiff, *
vs. * No. 05 - 402 - CD
DOUGLAS S. PERKINS, *
Defendant * Consolidated with

WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, and Parents and *
Natural Guardians of JONATHAN MAINES, *
a minor, *
Plaintiffs *
vs. * No. 05 - 403 - CD
DOUGLAS S. PERKINS, *
Defendant * Consolidated with

WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, and Parents and *
Natural Guardians of HARLEY MAINES, *
a minor, *
Plaintiffs *
vs. * No. 05 - 404 - CD
DOUGLAS S. PERKINS, *
Defendant * Consolidated with

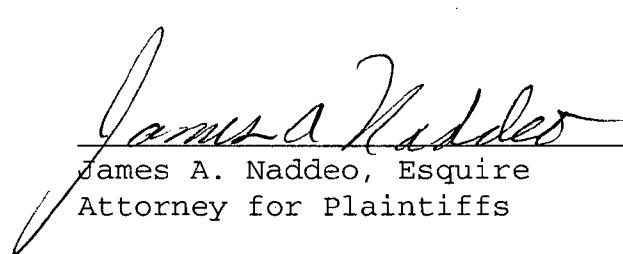
WADE A. MAINES and DARLENE A. MAINES, *
Husband and Wife, *
Plaintiffs *
vs. * No. 05 - 405 - CD
DOUGLAS S. PERKINS, *
Defendant *

PRAECIPE TO SETTLE AND DISCONTINUE

TO THE PROTHONOTARY:

Dear Sir:

Please mark the above-captioned cases settled and
discontinued.


James A. Naddeo, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Heather L. Maines

Vs.
Douglas S. Perkins

No. 2005-00402-CD

CERTIFICATE OF DISCONTINUATION

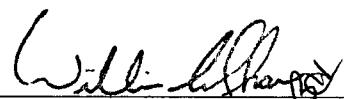
Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on June 2, 2008, marked:

Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by James A. Naddeo, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 2nd day of June A.D. 2008.



William A. Shaw, Prothonotary