

05-581-CD

05-581-CD

Marie Gladfelter et al v Leonard Guiher  
2005-581-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

**PRAECIPE TO ISSUE WRIT OF  
SUMMONS**

Filed on behalf of: PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

FILED No CC  
APR 22 2005  
William A. Shaw  
Prothonotary/Clerk of Courts  
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I went to  
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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CIVIL DIVISION LAW

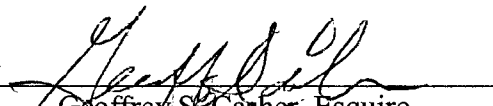
**PRAECIPE FOR WRIT OF SUMMONS**  
**IN A CIVIL ACTION**

TO: Clearfield County Prothonotary

Kindly issue a Writ of Summons in a Civil Action in the within matter directed against the Defendant, Leonard Guiher, Jr., whose last known address is 1665 Harper Mine Road, Curwensville, Clearfield County, Pennsylvania.

EDGAR SNYDER & ASSOCIATES, LLC

By

  
Geoffrey S. Casher, Esquire  
Attorney for Plaintiffs

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

**SUMMONS**

**Laurie L. Gladfelter  
Thomas D. Gladfelter**

**Vs.**

**NO.: 2005-00581-CD**

**Leonard Guiher Jr.**

TO: LEONARD GUIHER JR.

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: 04/22/2005

---

William A. Shaw  
Prothonotary

Issuing Attorney:

Geoffrey S. Casher Esq  
100 W. High Street  
Ebensburg, PA 15931

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100421  
NO: 05-581-CD  
SERVICE # 1 OF 1  
SUMMONS

PLAINTIFF: LAURIE L. GLADFELTER and THOMAS D. GLADFELTER  
vs.  
DEFENDANT: LEONARD GUIHER JR.

SHERIFF RETURN

NOW, April 26, 2005 AT 10:53 AM SERVED THE WITHIN SUMMONS ON LEONARD GUIHER JR. DEFENDANT AT 1665 HARPER MINE ROAD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RACHAEL GUIHER, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED

APR 27 2005  
6/3:05/4  
William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	SNYDER	194322	10.00
SHERIFF HAWKINS	SNYDER	194322	22.86

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2005

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So Answers,

  
Chester A. Hawkins  
Sheriff

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,  
Plaintiffs,

vs.

LEONARD GUIHER, JR.,  
Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper  
Supreme Court Number: 74753

John C. Dennison, II  
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED<sup>®</sup>  
MAY 10 2005  
1:45 PM  
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William A. Shaw  
Prothonotary/Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,  
Plaintiffs,

vs.

LEONARD GUIHER, JR.,  
Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
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\* Civil Action - Law  
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\* Number 2005 - 581 C.D.

**APPEARANCE**

**TO THE PROTHONOTARY OF CLEARFIELD COUNTY:**

Please enter our Appearance on behalf of the Defendant, LEONARD GUIHER, JR., in  
regard to the above entitled matter.

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper  
Attorneys for the Defendant

Dated: may 9, 2005

### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Appearance was served on the  
9<sup>th</sup> day of May, 2005, by United States Mail, First Class,  
Postage Prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
Edgar Snyder & Associates  
100 W. High Street  
Ebensburg, Pennsylvania 15931

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper

Attorneys for the Defendant



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

**COMPLAINT IN CIVIL ACTION**

Filed on behalf of: PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

**FILED**  
JUL 01 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
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Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

**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 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 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]. 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.**

LAWYER REFERRAL SERVICE -

Court Administrator's Office  
1 North Second Street  
Clearfield, PA 16830

Telephone (814) 765-2641, Ext: 50

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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CIVIL DIVISION LAW

**COMPLAINT IN CIVIL ACTION**

AND NOW, comes the Plaintiffs, LAURIE L. GLADFELTER and THOMAS D. GLADFELTER, by and through their attorneys, EDGAR SNYDER & ASSOCIATES, LLC and GEOFFREY S. CASHER, ESQUIRE and sets forth the following Complaint in Civil Action.

1. The Plaintiffs, LAURIE L. GLADFELTER and THOMAS D. GLADFELTER, are husband and wife, adult individuals who reside at P.O. Box 210, 1716 Lawrence Avenue, Hyde, Clearfield County, Pennsylvania 15843.

2. The Defendant, LEONARD GUIHER, JR., is an adult individual who currently resides at 1665 Harper Mine Road, Curwensville, Clearfield County, Pennsylvania.

3. The events herein complained of occurred on or about August 15, 2003 in or about the Township of Lawrence, Clearfield County, Pennsylvania along State Route 1001 at or near the intersection of Riverview Road, Township Road 247. State Route 1001, commonly referred to as Washington Avenue, generally runs in an East/West direction and is a two lane highway.

4. The Plaintiff, Laurie L. Gladfelter, was driving her 2000 Chevy Impala in a generally easterly direction along State Route 1001 when the Defendant pulled out from

Riverview Road T-247, which is controlled by a stop sign, and pulled into the path of the Plaintiff's vehicle causing a collision between the respective motor vehicles.

**COUNT I**  
**LAURIE L. GLADFELTER vs. LEONARD GUIHER, JR.**

5. The Plaintiff incorporates herein by reference paragraphs 1 through 5, inclusive as if the same were fully set forth at length herein.

6. The aforesaid accident was a direct and proximate result of the negligence, the carelessness, the recklessness of the Defendant, Leonard Guiher, Jr. as follows:

- a. in failing to keep a safe and careful and adequate lookout for vehicles on the roadway;
- b. in failing to operated his vehicle at a rate of speed that he was unable to bring his vehicle to a stop before striking the vehicle that the Plaintiff was driving;
- c. in failing to stop at a stop sign and yield the right-of-way to the traffic along State Route 1001;
- d. in failing to keep control and maintain his vehicle;
- e. in failing to yield the right-of-way to the Plaintiff;
- f. in failing to warn the Plaintiff of the impending collision;
- g. in failing to take all reasonable measures to avoid said collision and to keep his vehicle under control;
- h. in failing to be attentive at the wheel and

- i. in violating the ordinance of Lawrence Township and/or the laws of the Statutes of the Commonwealth of Pennsylvania, including but not limited to, Section 3223 (b) Stop Sign and Yield Signs.

7. As a direct and proximate result of the aforesaid accident, the Plaintiff, Laurie L. Gladfelter, suffered the following injuries, some of all which are permanent in nature:

- a. pain and numbness, left arm, wrist, elbow and left knee;
- b. left arm abrasions and contusions;
- c. back pain;
- d. pain radiating down left leg;
- e. ulnar nerve swelling and ulnar nerve entrapment, traumatic ulnar nerve neuritis;
- f. lumbar pain and spasms;
- g. left knee;
- h. tear of the posterior medial aspect of medial meniscus;
- i. surgery to left knee with debridement of the ACL and excision of medial plica;
- j. surgical intervention for tardy ulnar nerve palsy left upper extremity and
- k. permanent scarring and disfigurement to left knee/leg and right elbow and arm.

8. The Plaintiff, Laurie L. Gladfelter, is entitled to non-economic damages under Pennsylvania Law in that she is entitled to the full tort option under the Pennsylvania Motor Vehicle Code.

9. As a direct and proximate result of the aforesaid accident, the Plaintiff, Laurie L. Gladfelter, will be required to and obliged to receive and undergo medical attention and care, and to expend various sums of money for surgical and medical attention, surgical supplies, medical supplies, hospital and medical expenses, nurse's and doctor's care and services which expenses have or may exceed the sums recoverable under the limits of the Pennsylvania Motor Vehicle Code and the Pennsylvania Financial Responsibility Act and may be obliged to expend such sums or incur such expenditures for an indefinite time into the future.

10. As a further result of the accident, the Plaintiff, Laurie L. Gladfelter, has suffered severe physical pain, mental anguish, inconvenience, humiliation, embarrassment, loss of enjoyment of life, loss of vitality, vigor, health, and/or strength, disfigurement and scarring and may continue to suffer the same for an indefinite time into the future.

11. As a further direct and proximate result of the aforesaid accident, the Plaintiff has suffered a loss of earnings or earning capacity and power.

WHEREFORE, the Plaintiff, Laurie L. Gladfelter, demands judgment in her favor against the Defendant, Leonard Guiher, Jr., in an amount in excess of the statutory limits.

A jury trial is demanded.

**COUNT II**  
**THOMAS D. GLADFELTER vs. LEONARD GUIHER, JR.**

12. The Plaintiff incorporates herein by reference paragraphs 1 through 12, inclusive as if the same were fully set forth at length herein.

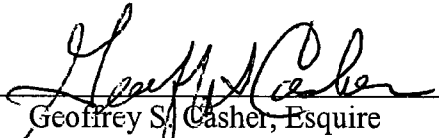
13. At all times relevant hereto, the Plaintiffs, Laurie L. Gladfelter and Thomas D. Gladfelter, were and continue to be husband and wife.

14. As a direct and proximate result of the aforesaid injuries sustained by the wife, Laurie L. Gladfelter, the husband Plaintiff has been damaged in that he has lost and will lose comfort, society, companionship, and services of his wife.

WHEREFORE, the Plaintiff, Thomas D. Gladfelter, respectfully requests that this Honorable Court enter judgment in his favor against the Defendant, Leonard Guiher, Jr. in an amount in excess of the statutory arbitration limits, together with interest and associated costs.

Respectfully submitted,

EDGAR SNYDER & ASSOCIATES, LLC

By   
Geoffrey S. Casher, Esquire  
Attorney for Plaintiffs

**VERIFICATION**

I, LAURIE L. GLADFELTER, Plaintiff herein, hereby verify that the averments of fact contained in the foregoing COMPLAINT IN CIVIL ACTION are true and correct and based upon my personal knowledge, information or belief. I understand that these averments of fact are made subject to the penalties of 18 Purdons Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
LAURIE L. GLADFELTER

Date: 06-16-05



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

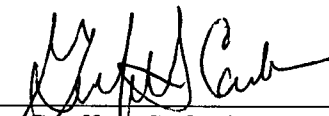
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within **Complaint in Civil Action** was served on all **Counsel** listed below, by First Class Mail, postage prepaid, on this 30th day of, June, 2005:

**Troy J. Harper, Esquire  
DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, PA 15825**

EDGAR SNYDER & ASSOCIATES, LLC

By: \_\_\_\_\_

  
Geoffrey S. Casher  
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

**NOTICE OF SERVICE**

Filed on behalf of: PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

**FILED** *no cc*  
*mtj:cc*  
JUL 11 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
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LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

**NOTICE OF SERVICE OF INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT**

I hereby certify that on this 8th day of July, 2005, the original INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE DEFENDANT, and one (1) copy of NOTICE OF SERVICE were mailed by First Class Mail, postage prepaid, to counsel for Defendant at the following address:

**Troy J. Harper, Esquire  
DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, PA 15825-1291**

EDGAR SNYDER & ASSOCIATES, LLC

By



Geoffrey S. Casher  
Attorney for Plaintiffs

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper  
Supreme Court Number: 74753

John C. Dennison, II  
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

*cc* **FILED** *cc*  
*m* 11-3361  
JUL 18 2005  
William A. Shaw  
Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant .

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law

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\* Number 2005 - 581 C.D.

### **CERTIFICATE OF SERVICE**

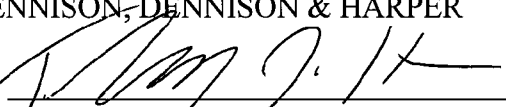
I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiffs and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiffs were served on the 14<sup>th</sup> day of

July, 2005, by United States Mail, First Class, postage prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, Pennsylvania 15931

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper

Attorneys for the Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

**NOTICE OF DEPOSITION**

Filed on behalf of: PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

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*m/22281 @*  
JUL 19 2005  
Shaw  
for Secretary, Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

**NOTICE OF DEPOSITION**

To: Troy J. Harper, Esquire  
Dennison, Dennison & Harper  
293 Main Street  
Brookville, PA 15825

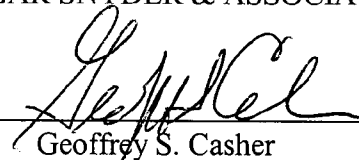
**RE: Our Client: Laurie L. Gladfelter**  
**Our File No.: 356746**

PLEASE TAKE NOTICE that the Plaintiff LAURIE L. GLADFELTER, by her Attorneys, EDGAR SNYDER & ASSOCIATES, LLC, will take the deposition of LEONARD GUIHER, JR., pursuant to the Federal Rules of Civil Procedure, as amended, before a court reporter duly authorized to administer oaths, on Tuesday, November 8, 2005 at 10:00 a.m., at the offices of Sargent's Court Reporting located at 106 North 2<sup>nd</sup> Street, 1<sup>st</sup> Floor, Clearfield, PA., at which time and place you are invited to appear and take such part as shall be fitting and proper.

The deposition shall be taken before a Notary Public employed by Sargent's Court Reporting.

EDGAR SNYDER & ASSOCIATES, LLC

By



Geoffrey S. Casher  
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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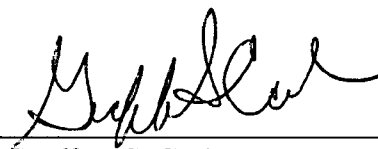
NO. 05-581-CD

CIVIL DIVISION LAW

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above Notice of Deposition was served on all Counsel by First Class Mail, postage prepaid, on this 18th day of July, 2005.

**Troy J. Harper, Esquire  
Dennison, Dennison & Harper  
293 Main Street  
Brookville, PA 15825**

By   
Geoffrey S. Casher  
Attorney for Plaintiffs



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C.D.

Type of Case: Civil Division

Type of Pleading: Answer and New Matter

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper  
Supreme Court Number: 74753

John C. Dennison, II  
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED<sup>CR</sup>  
m/j: 34611  
JUL 25 2005

William A. Shaw  
Prothonotary/Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

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\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania

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\* Civil Action - Law

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\* Number 2005 - 581 C.D.

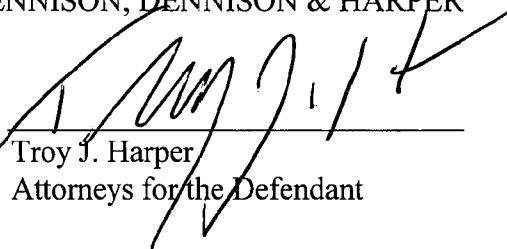
### **NOTICE TO PLEAD**

**TO: THE PLAINTIFFS:**

You are hereby notified to plead to the within New Matter within twenty (20) days from service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By



Troy J. Harper  
Attorneys for the Defendant

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
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\* Civil Action - Law  
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\* Number 2005 - 581 C.D.

### **ANSWER AND NEW MATTER**

AND NOW, comes the Defendant, LEONARD GUIHER, JR., by and through his attorneys, Dennison, Dennison & Harper, who file the following Answer and New Matter in response to the Plaintiffs' Complaint:

1. After reasonable investigation, the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 1 of the Plaintiffs' Complaint, and said averments are therefore denied.

2. Admitted.

3. The averments of Paragraph 3 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

4. The averments of Paragraph 4 of the Plaintiffs' Complaint are admitted only insofar as the Defendant, Leonard Guiher, Jr., was operating the vehicle and the Plaintiff was operating a vehicle. The remaining averments of Paragraph 4 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

## **COUNT I**

### **LAURIE L. GLADFELTER vs. LEONARD GUIHER, JR.**

5. Paragraph 5 of the Plaintiffs' Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 4 of this Answer are incorporated herein by reference thereto.

6. The averments of Paragraph 6 of the Plaintiffs' Complaint and subparagraphs a. through i. thereof are admitted only insofar as the Defendant, Leonard Guiher, Jr., was operating the vehicle. The remaining averments of Paragraph 6 of the Plaintiffs' Complaint and subparagraphs a. through i. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

7. After reasonable investigation, the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 7 of the Plaintiffs' Complaint and Subparagraphs a. through k. thereof, and said averments are therefore denied.

8. The averments of Paragraph 8 of the Plaintiffs' Complaint constitute conclusions of law and are therefore denied.

9. After reasonable investigation the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 9 of the Plaintiffs' Complaint, and said averments are therefore denied.

10. After reasonable investigation the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 10 of the Plaintiffs' Complaint, and said averments are therefore denied.

11. After reasonable investigation the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 11 of the Plaintiffs' Complaint, and said averments are therefore denied.

**WHEREFORE**, the Defendant, Leonard Guiher, Jr., demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

## **COUNT II**

### **THOMAS D. GLADFELTER vs. LEONARD GUIHER, JR.**

12. Paragraph 12 of the Plaintiffs' Complaint fails to contain any specific averments of fact is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 11 of this Answer are incorporated herein by reference thereto.

13. After reasonable investigation the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 13 of the Plaintiffs' Complaint, and said averments are therefore denied.

14. After reasonable investigation the Defendant, Leonard Guiher, Jr., is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 14 of the Plaintiffs' Complaint, and said averments are therefore denied.

**WHEREFORE**, the Defendant, Leonard Guiher, Jr., demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

**NEW MATTER**

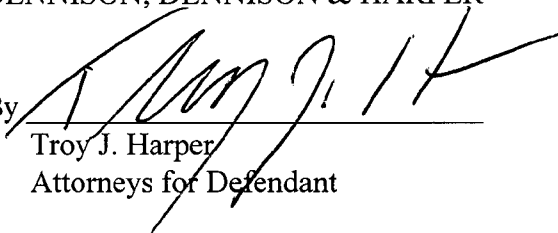
15. The terms and conditions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., are hereby incorporated herein by reference thereto as fully as the same bar and/or diminish any claim or cause of action of the Plaintiffs.

16. The Plaintiffs have failed to state a cause of action upon which relief may be granted.

**WHEREFORE**, the Defendant, Leonard Guiher, Jr., demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

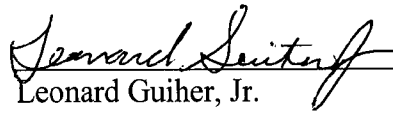
DENNISON, DENNISON & HARPER

By

  
Troy J. Harper  
Attorneys for Defendant

## VERIFICATION

I verify that the averments made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

  
Leonard Guiher, Jr.

### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer and New Matter was served on the 21<sup>st</sup> day of July, 2005, by United States Mail, First Class, Postage Prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper

Attorneys for the Defendant



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

No. 05-581-CD

Plaintiffs,

**PLAINTIFFS' REPLY TO NEW MATTER  
CERTIFICATE OF SERVICE**

vs.

Filed on behalf of: PLAINTIFFS

LEONARD GUIHER, JR.

Defendant.

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

m11:21BAK  
AUG 10 2005  
NO CC  
CW

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and	:	NO. 05-581-CD
THOMAS D. GLADFELTER	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	CIVIL DIVISION LAW
	:	
LEONARD GUIHER, JR.	:	
	:	
Defendant	:	

**REPLY TO NEW MATTER**

AND NOW comes the Plaintiffs, LAURIE L. GLADFELTER and THOMAS D. GLADFELTER, by and through their attorneys EDGAR SNYDER & ASSOCIATES, LLC and GEOFFREY S. CASHER, ESQUIRE and files the following Reply to New Matter and sets forth as follows:

15. Denied. This is a conclusion of law to which no response is required. To the extent an answer is required, all factual allegations are denied.


16. Denied. Plaintiff incorporates its Complaint as if said Complaint is set forth in whole herein. It is further denied that the Plaintiff has failed to state a cause of action upon which relief can be granted and states that the Plaintiffs' Complaint states a cause of action and the Plaintiffs are entitled to relief as requested.

WHEREFORE, the Plaintiffs, Laurie L. Gladfelter and Thomas D. Gladfelter, demand judgment in their favor against the Defendants, together with costs of prosecution herein plus interest.

A jury trial is demanded.

Respectfully submitted,

EDGAR SNYDER & ASSOCIATES, LLC

By   
Geoffrey S. Casher  
Attorney for Plaintiffs

**VERIFICATION**

I, LAURIE L. GLADFELTER, Plaintiff herein, hereby verify that the averments of fact contained in the foregoing PLAINTIFFS' REPLY TO NEW MATTER are true and correct and based upon my personal knowledge, information or belief. I understand that these averments of fact are made subject to the penalties of 18 Purdons Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.

  
LAURIE L. GLADFELTER

Date: 8/5/05

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

: NO. 05-581-CD  
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CIVIL DIVISION LAW

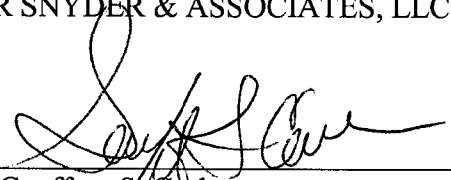
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within **Plaintiffs' Reply to New Matter** was served on all Counsel listed below, by First Class Mail, postage prepaid, on this 9<sup>th</sup> day of August, 2005:

**Troy J. Harper, Esquire  
DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, PA 15825-1291**

EDGAR SNYDER & ASSOCIATES, LLC

By: \_\_\_\_\_

  
Geoffrey S. Casher  
Attorney for Plaintiffs

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of  
Deposition of Laurie L. Gladfelter

Filed on behalf of: Defendant

Counsel of Record for this Party:  
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED <sup>no cc</sup>  
m/12:51/81  
OCT 18 2005  
(LN)

William A. Shaw  
Prothonotary Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\*

\* Civil Action - Law  
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\* Number 2005 - 581 C.D.

### NOTICE OF DEPOSITION

TO: Laurie L. Gladfelter  
c/o Geoffrey S. Casher  
Edgar Snyder & Associates, LLC  
100 West High Street  
Ebensburg, PA 15931

Take notice that the deposition of **LAURIE L. GLADFELTER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Tuesday, November 8, 2005, at 11:00 a.m., at the offices of Sargent's Court Reporting, 100 North 2<sup>nd</sup> Street, 1<sup>st</sup> Floor, Clearfield, Pennsylvania 16830. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: October 17, 2005

By: 

Troy J. Harper  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 17 day of October, 2005, a true and correct copy of the foregoing Notice of Deposition for Laurie L. Gladfelter was mailed by United States mail, first class, postage prepaid, addressed to the following:

Geoffrey S. Casher, Esquire  
Edgar Snyder & Associates, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

Sargent's Court Reporting Service, Inc.  
210 Main Street  
Johnstown, PA 15901

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper  
Attorneys for Defendant



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C. D.

Type of Case: Civil Division

Type of Pleading: Notice of  
Deposition of Thomas D. Gladfelter

Filed on behalf of: Defendant

Counsel of Record for this Party:  
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED *no cc*  
*mjb:5/1/04*  
OCT 18 2005 *UN*  
William A. Shaw  
Prothonotary Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
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\* Civil Action - Law  
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\* Number 2005 - 581 C.D.

### NOTICE OF DEPOSITION

TO: Thomas D. Gladfelter  
c/o Geoffrey S. Casher  
Edgar Snyder & Associates, LLC  
100 West High Street  
Ebensburg, PA 15931

Take notice that the deposition of **THOMAS D. GLADFELTER** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Tuesday, November 8, 2005, at 12:00 p.m., at the offices of Sargent's Court Reporting, 100 North 2<sup>nd</sup> Street, 1<sup>st</sup> Floor, Clearfield, Pennsylvania 16830. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

Date: October 17, 2005

By: 

Troy J. Harper  
Attorneys for Defendant

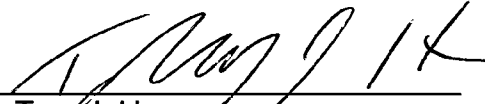
CERTIFICATE OF SERVICE

I hereby certify that on the 17 day of October, 2005, a true and correct copy of the foregoing Notice of Deposition for Thomas D. Gladfelter was mailed by United States mail, first class, postage prepaid, addressed to the following:

Geoffrey S. Casher, Esquire  
Edgar Snyder & Associates, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

Sargent's Court Reporting Service, Inc.  
210 Main Street  
Johnstown, PA 15901

DENNISON, DENNISON & HARPER

By:   
Troy J. Harper  
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper

Supreme Court Number: 74753

John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED <sup>NO CC</sup>  
mliawh  
OCT 26 2005 <sup>UN</sup>

William A. Shaw  
Prothonotary/Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant .

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law

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\* Number 2005 - 581 C.D.

### CERTIFICATE OF SERVICE

I certify that an original and one certified copy of the Defendant's Answers and  
Objections to Plaintiffs' Interrogatories Directed to Defendant and an original and one certified  
copy of the Defendant's Responses and Objections to Plaintiff's Request for Production of  
Documents Directed to Defendant were served on the 24<sup>th</sup> day of OCTOBER,  
2005, by United States Mail, First Class, postage prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, Pennsylvania 15931

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper

Attorneys for the Defendant

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

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

**PRAECIPE FOR TRIAL**

**CERTIFICATE OF SERVICE**

Filed on behalf of: PLAINTIFFS

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

JURY TRIAL DEMANDED

**FILED** *no cc*  
*mld.0061*  
**FEB 13 2006** *@*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

**PRAECIPE FOR TRIAL**

To the Prothonotary:

Please list the above-captioned case for trial.

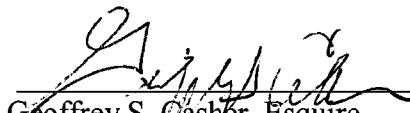
As listing counsel, pursuant to Local Rule 212.2, I hereby certify:

1. There are no outstanding motions.
2. All discovery is completed and the pleadings are closed.
3. A jury trial is demanded.
4. All counsel of record and unrepresented parties have been served with this

Praecipe by United States Mail, first class, postage prepaid.

Respectfully submitted,

**EDGAR SNYDER & ASSOCIATES, LLC**

  
\_\_\_\_\_  
Geoffrey S. Casher, Esquire  
Attorney for Plaintiffs

Dated: February 9, 2006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER

Plaintiffs,

vs.

LEONARD GUIHER, JR.

Defendant

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NO. 05-581-CD

CIVIL DIVISION LAW

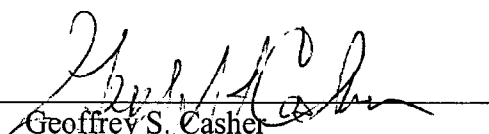
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within **PRAECIPE FOR TRIAL** was served on all Counsel listed below, by First Class Mail, postage prepaid, on this 20<sup>th</sup> day of February, 2006:

**Troy J. Harper, Esquire  
DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, PA 15825-1291**

EDGAR SNYDER & ASSOCIATES, LLC

By: \_\_\_\_\_

  
Geoffrey S. Casher  
Attorney for Plaintiffs



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C.D.

Type of Case: Civil Division

Type of Pleading: Motion to Strike Case  
From Trial List Pursuant to  
46 J.D.R.C.P. 212.2(b)

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper  
Supreme Court Number: 74753

John C. Dennison, II  
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED *rec*  
mjb:5261 *Atty Harper*  
FEB 15 2006

William A. Shaw  
Prothonotary/Clerk of Courts

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
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\* Civil Action - Law  
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\* Number 2005 - 581 C.D.

**MOTION TO STRIKE CASE FROM TRIAL LIST PURSUANT  
TO 46 J.D.R.C.P. 212.2(b)**

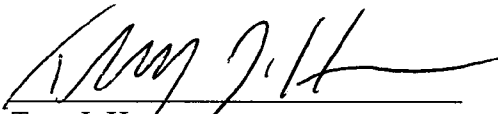
AND NOW, comes the Defendant, LEONARD GUIHER, JR., by and through his attorneys, Dennison, Dennison & Harper, who file the following Motion to Strike Case from Trial List Pursuant to 46 J.D.R.C.P. 212.2(b):

1. A Complaint in the above-captioned matter was filed on or about July 1, 2005. The Complaint seeks damages for alleged personal injuries as a result of a two-vehicle accident on August 15, 2003.
2. On or about February 10, 2006, the Plaintiffs filed a Praecipe for Trial pursuant to 46 J.D.R.C.P. 212(a).
3. This matter has not been previously listed for trial.
4. This matter should be stricken from the Trial List as discovery has not been completed. In particular, some of the Plaintiff's medical records from her treating physicians have not been secured or produced and, based on the production of those records, the Defendant may request an independent medical examination.

**WHEREFORE**, the Defendant, Leonard Guiher, requests this Honorable Court to enter an Order striking this case from the Spring Trial List and to direct the Court Administrator to place the matter on the Summer Trial List.

RESPECTFULLY SUBMITTED,

DENNISON, DENNISON & HARPER

By   
Troy J. Harper  
Attorneys for Defendant

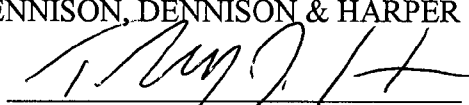
### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion to Strike Case from Trial List was served on the 14<sup>th</sup> day of February, 2006, by United States Mail, First Class, Postage Prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for the Defendant

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania

\*

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\* Civil Action - Law

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\* Number 2005 - 581 C.D.

### **ORDER**

**AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2006,** upon  
consideration of the Defendant's Motion to Strike this case from the Trial List,

**IT IS HEREBY ORDERED** that said Motion is granted and the case is stricken from  
the Spring 2006 Trial List. The Court Administrator is directed to place the matter on the  
Summer 2006 Trial List.

BY THE COURT,

---

J.

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

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER  
Plaintiffs,  
vs.  
LEONARD GUIHER, JR.  
Defendant  
No. 05-581-CD

**RULE**

NOW, this 17<sup>th</sup> day of February, 2006, upon consideration of the attached Motion to Strike this case from the Spring 2006 Trial List, a Rule is hereby issued upon the parties to Show Cause why the Motion should not be granted. Rule Returnable the 17<sup>th</sup> day of March, 2006, for filing written response.

**NOTICE**

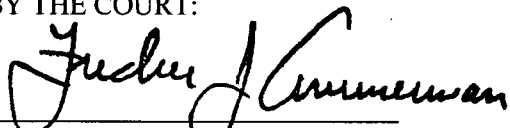
A MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING MOTION OR MOTION BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED 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.

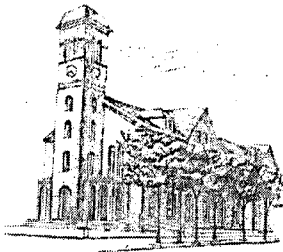
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR  
Clearfield County Courthouse  
230 East Market Street, Suite 228  
Clearfield, PA 16830  
(814) 765-2641, Ext. 1300 or 1301

FILED <sup>2cc</sup>  
013 1126  
FEB 21 2006  
Any: Casher  
Harper

William A. Shaw  
Prothonotary/Clerk of Courts

BY THE COURT:  
  
PRESIDENT JUDGE  
FREDRIC J. AMMERMAN



## Clearfield County Office of the Prothonotary and Clerk of Courts

**William A. Shaw**  
Prothonotary/Clerk of Courts

**David S. Ammerman**  
Solicitor

**Jacki Kendrick**  
Deputy Prothonotary

**Bonnie Hudson**  
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

It has come to my attention that there is some confusion on court orders over the issue of service. To attempt to clear up this question, from this date forward until further notice, this or a similar memo will be attached to each order, indicating responsibility for service on each order or rule. If you have any questions, please contact me at (814) 765-2641, ext. 1331. Thank you.

Sincerely,

William A. Shaw  
Prothonotary

DATE: 2/21/06

\_\_\_\_\_ You are responsible for serving all appropriate parties.

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

  X   Plaintiff(s)/Attorney(s)

  X   Defendant(s)/Attorney(s)

\_\_\_\_\_ Other

\_\_\_\_\_ Special Instructions:

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania

\*

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\* Civil Action - Law

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\* Number 2005 - 581 C.D.

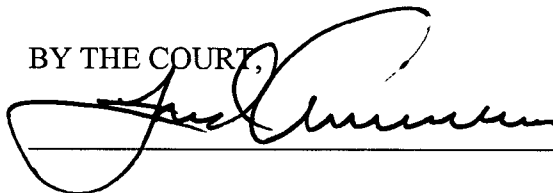
**ORDER**

AND NOW, this 28<sup>th</sup> day of March, 2006, upon

consideration of the Defendant's Motion to Strike this case from the Trial List,

**IT IS HEREBY ORDERED** that said Motion is granted and the case is stricken from the Spring 2006 Trial List. The Court Administrator is directed to place the matter on the next available Trial List.

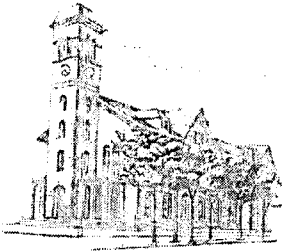
BY THE COURT,



J.

m/2:30/01  
MAR 23 2006  
ICC Atty's:  
Casher  
Harper  
William A. Shaw  
Prothonotary/Clerk of Courts  
(6K)





## Clearfield County Office of the Prothonotary and Clerk of Courts

**William A. Shaw**  
Prothonotary/Clerk of Courts

**David S. Ammerman**  
Solicitor

**Jacki Kendrick**  
Deputy Prothonotary

**Bonnie Hudson**  
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

It has come to my attention that there is some confusion on court orders over the issue of service. To attempt to clear up this question, from this date forward until further notice, this or a similar memo will be attached to each order, indicating responsibility for service on each order or rule. If you have any questions, please contact me at (814) 765-2641, ext. 1331. Thank you.

Sincerely,

William A. Shaw  
Prothonotary

DATE: 3/28/06

\_\_\_\_\_ You are responsible for serving all appropriate parties.

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

X Plaintiff(s)/Attorney(s)

X Defendant(s)/Attorney(s)

\_\_\_\_\_ Other

\_\_\_\_\_ Special Instructions:

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

CIVIL ACTION - LAW

Number 2005 - 581 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:


Troy J. Harper  
Supreme Court Number: 74753

John C. Dennison, II  
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

**FILED**

**MAR 29 2006**

*m/12:30/4*  
William A. Shaw   
Prothonotary/Clerk of Courts  
*Wu C/C*

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiffs,

vs.

LEONARD GUIHER, JR.,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania

\*

\*

\* Civil Action - Law

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\* Number 2005 - 581 C.D.

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the Rule entered by the Court on February 17, 2006, on the Motion to Strike was served directly by the Prothonotary of Clearfield on the following as reflected on the Docket in this matter on the 21<sup>st</sup> day of February 2006, by United States Mail, First Class, Postage Prepaid, addressed to the following:

Geoffrey S. Casher, Esq.  
EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931

DENNISON, DENNISON & HARPER

By

  
Troy J. Harper

Attorneys for the Defendant

LA

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

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,  
Plaintiffs

vs.

LEONARD GUIHER, JR.,  
Defendant

\*  
\*  
\*  
\* NO. 05-581-CD  
\*  
\*

**ORDER**

**FILED** cc Atty's:  
03:47 PM Cashier  
AUG 14 2006 Harper  
EK

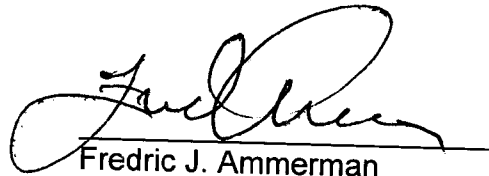
William A. Shaw  
Prothonotary/Clerk of Courts

NOW, this 11<sup>th</sup> day of August, 2006, following Pre-Trial Conference with counsel  
for the parties as set forth above, it is the ORDER of this Court as follows:

1. Jury Selection will be held on August 29, 2006 commencing at 9:00 a.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.
2. Jury Trial is hereby scheduled for December 18, 19 and 20, 2006 commencing at 9:00 a.m. each day in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.
3. Any party making objections relative the testimony to be provided by any witness in the form of a deposition at the time of Trial shall submit said objections to the Court, in writing, no later than thirty (30) days prior to the commencement of Trial. All objections shall reference specific page and line numbers within the deposition(s) in question along with that party's brief relative same. The opposing party shall submit its brief in opposition to said objections no later than fifteen (15) days prior to the commencement of Trial.

4. Any party filing any Motion or Petition regarding limitation or exclusion of evidence or testimony to be presented at time of trial, including but not limited to Motions in Limine, shall file the same no more than thirty (30) days prior to the trial date. The party's Petition or Motion shall be accompanied by an appropriate brief. The responding party thereto shall file its Answer and submit appropriate response brief no later than fifteen (15) days prior to trial.
5. The parties hereby agree to the authenticity of any and all medical records and bills which were previously provided through the discovery process. No party shall be required to produce a medical records witness for purposes of authentication.

BY THE COURT,

  
Fredric J. Ammerman  
PRESIDENT JUDGE

DATE: 8/14/06

       You are responsible for serving all appropriate parties.

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

       Plaintiff(s)   X   Plaintiff(s) Attorney        Other

       Defendant(s)   X   Defendant(s) Attorney

       Special instructions:

William A. Shaw  
Prothonotary/Clerk of Courts

AUG 14 2006

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

Plaintiff,

vs.

LEONARD GUIHER, JR.

Defendant.

No. 05-581-CD

PRAECIPE TO SETTLE AND  
DISCONTINUE

Filed on behalf of:  
Plaintiff

Counsel of record for this party:

GEOFFREY S. CASHER, ESQUIRE  
E-mail address: gcasher@edgarsnyder.com

PA I.D. No. 35309

EDGAR SNYDER & ASSOCIATES, LLC  
100 West High Street  
Ebensburg, PA 15931-1539

(814) 472-9000

**FILED**  
SEP 14 2006  
m/l: co/w  
William A. Shaw  
Prothonotary/Clerk of Courts  
No CEN.  
URGENT OF DISCONTINUE  
TO ATTY & C/A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURIE L. GLADFELTER and  
THOMAS D. GLADFELTER,

No.: 05-581-CD

Plaintiffs

-VS-

LEONARD GUIHER, JR.,

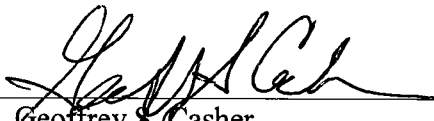
Defendant

**PRAECIPE TO SETTLE AND DISCONTINUE**

To: William Shaw, Sr., Prothonotary

Please satisfy, settle and discontinue the within matter.

EDGAR SNYDER & ASSOCIATES, LLC

By   
Geoffrey S. Casher  
Attorney for Plaintiff(s)



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

**CIVIL DIVISION**

**Laurie L. Gladfelter  
Thomas D. Gladfelter**

**Vs.  
Leonard Guiher Jr.**

**No. 2005-00581-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 September 14, 2006, marked:

Satisfy, settle and discontinue

Record costs in the sum of \$117.86 have been paid in full by Edgar Snyder & Assoc.,

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 14th day of September A.D. 2006.

\_\_\_\_\_  
William A. Shaw, Prothonotary