

05-847-CD  
S. Singh vs. A. Blanchard et al

Sarmukh Singh v. Anthony Blanchard et al  
2005-847-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

COMPLAINT

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

*Paul Colavecchi*

PAUL COLAVECCHI, ESQUIRE

FILED

3cc

01/05/05  
JUN 15 2005

Atty P. Colavecchi  
Atty pd. 8500

William A. Shaw  
Prothonotary/Clerk of Courts

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

SARMUKH SINGH,

Plaintiff : No. 05 -

- CD

Vs.

ANTHONY J. BLANCHARD and

JENKINS TRANSPORT, INC.,

Defendants:

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.

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
Second and Market Streets  
Clearfield, PA 16830  
Phone 814/765-2641 Ex. 5982

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

SARMUKH SINGH, :  
Plaintiff : No. 05 - - CD  
Vs. :  
: :  
ANTHONY J. BLANCHARD and, :  
JENKINS TRANSPORT, INC., :  
Defendants:

**COMPLAINT**

1. Plaintiff is Sarmukh Singh an individual residing at 6806 Trade Winds, Bakersfield, California 93307.

2. Defendants are:

a. Anthony J. Blanchard an individual residing at 178 Melissa Drive, Bainbridge, Georgia 31717; and,

b. Jenkins Transport, Inc., which is the employer of Defendant having its principal address at 97 Old Dixie Highway, Adairsville, Georgia 30103.

3. On or about August 3, 2003, Plaintiff was operating a 1987 Peterbuilt truck and was traveling eastbound on Interstate 80 in Clearfield, Pennsylvania.

4. On that same date and time, Defendant was operating a 1984 International truck traveling eastbound on Interstate 80 in Clearfield County, Pennsylvania.

5. Defendant was traveling directly behind Plaintiff in the left lane of traffic, traveling eastbound, in the same direction.

6. While traveling, Plaintiff was forced to stop for traffic because all traffic in the left bound lane had stopped.

7. Defendant was operating his vehicle directly behind Plaintiff's vehicle and failed to stop, thus striking the rear of Plaintiff's vehicle.

8. Following the accident, the Defendant was cited for following too closely, pursuant to 3310(a) of the Pennsylvania Motor Vehicle Code and the impact of the accident caused damage to Plaintiff vehicle's and injuries to Plaintiff.

**COUNT I**

**SARMUKH SINGH VS. ANTHONY J. BLANCHARD**

Paragraphs 1 through 8 are incorporated herein by reference thereto.

9. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant, Anthony J. Blanchard, in any or all of the following respects:

a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;

b. In failing to have the vehicle under proper control;

c. In continuing to operate the vehicle in a direction toward Plaintiff's vehicle when the Defendant saw or in the

exercise of reasonable diligence should have seen that further operation in that direction would result in a collision;

d. In that the driver was inattentive and failed to maintain a sharp lookout of the road and the surrounding traffic conditions;

e. In failing to operate the brakes in such a manner so that the vehicle could be stopped in time to avoid a collision;

f. In violating the various statutes and municipal ordinances pertaining to the operation of motor vehicles on public thoroughfares under the circumstances;

g. In failing to maintain a reasonable lookout for the presence of other motor vehicles on the road;

h. In failing to avoid hitting Plaintiff's vehicle when the driver saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant; and,

i. In operating his vehicle too close to that Plaintiff's vehicle.

10. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to his bones, muscles, tissues and ligaments, shock and injury to the nerves and nervous system and particularly injuries to his back and legs.

11. As a result of the injuries, Plaintiff has sustained the following damages:

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P.O. BOX 131  
CLEARFIELD, PA

a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for surgical and medical attention, medical supplies, medicines and attendant services;

c. Said Plaintiff's general health, strength and vitality have been impaired; and,

d. Said Plaintiff has been and will be deprived of earnings.

12. By further reason of said collision, Plaintiff has been damaged as follows:

a. Plaintiff lost business revenue for the time he was unable to work and until he could rent a trailer from August 3, 2003, to September 7, 2003, in the amount of Seven Thousand One Hundred Fifty-eight Dollars (\$7,158.00);

b. Plaintiff had to rent a trailer from September 8, 2003, to November 15, 2003, while his trailer was being repaired at the rate of One Thousand One Hundred Dollars (\$1,100.00) per month for a total of Three Thousand Three Hundred Dollars (\$3,300.00);

WHEREFORE, Plaintiff brings this action against Defendant to recover damages in excess of the Board of Arbitrators of this Court and in excess of Twenty-five Thousand Dollars (\$25,000.00).

**COUNT II**

***SARMUKH SINGH VS. JENKINS TRANSPORT, INC.***

Paragraphs 1 through 8 are incorporated herein by reference thereto.

13. At all times relevant hereto, the Defendant, Jenkins Transport, Inc., was acting by and through its servant, agents, and employees, who were then and there engaged upon the performance of their duties, within the scope of their employment and upon the business of the Defendant. Specifically Anthony J. Blanchard is an employee of Defendant and was acting within the scope of his employment.

14. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant, Anthony J. Blanchard, in any or all of the following respects:

a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;

b. In failing to have the vehicle under proper control;

c. In continuing to operate the vehicle in a direction toward Plaintiff's vehicle when the Defendant saw or in the exercise of reasonable diligence should have seen that further operation in that direction would result in a collision;

d. In that the driver was inattentive and failed to maintain a sharp lookout of the road and the surrounding traffic conditions;

e. In failing to operate the brakes in such a manner so that the vehicle could be stopped in time to avoid a collision;

f. In violating the various statutes and municipal ordinances pertaining to the operation of motor vehicles on public thoroughfares under the circumstances;

g. In failing to maintain a reasonable lookout for the presence of other motor vehicles on the road;

h. In failing to avoid hitting Plaintiff's vehicle when the driver saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant; and,

i. In operating his vehicle too close to that Plaintiff's vehicle.

15. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to his bones, muscles, tissues and ligaments, shock and injury to the nerves and nervous system and particularly injuries to his back and legs.

16. As a result of the injuries, Plaintiff has sustained the following damages:

a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for surgical and medical attention, medical supplies, medicines and attendant services;

c. Said Plaintiff's general health, strength and vitality have been impaired; and,

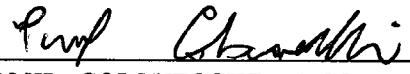
d. Said Plaintiff has been and will be deprived of earnings.

17. By further reason of said collision, Plaintiff has been damaged as follows:

a. Plaintiff lost business revenue for the time he was unable to work and until he could rent a trailer from August 3, 2003, to September 7, 2003, in the amount of Seven Thousand One Hundred Fifty-eight Dollars (\$7,158.00);

b. Plaintiff had to rent a trailer from September 8, 2003, to November 15, 2003, while his trailer was being repaired at the rate of One Thousand One Hundred Dollars (\$1,100.00) per month for a total of Three Thousand Three Hundred Dollars (\$3,300.00);

WHEREFORE, Plaintiff brings this action against Defendant to recover damages in excess of the Board of Arbitrators of this Court and in excess of Twenty-five Thousand Dollars (\$25,000.00).

  
PAUL COLAVECCHI, ESQUIRE

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COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

**VERIFICATION**

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
SARMUKH SINGH

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100558  
NO: 05-847-CD  
SERVICE # 1 OF 2  
COMPLAINT

PLAINTIFF: SARMUKH SINGH  
vs.  
DEFENDANT: ANTHONY J. BLANCHARD and JENKINS TRANSPORT, INC.

**SHERIFF RETURN**

NOW, June 20, 2005 SERVED THE WITHIN COMPLAINT ON ANTHONY J. BLANCHARD DEFENDANT AT 178 MELISSA DRIVE, BAINBRIDGE, GA, 31717 BY CERTIFIED MAIL # 7004 1350 0004 9672 6006. THE RETURN RECEIPT IS HERETO ATTACHED ENDORSED BY HENRY BLANCHARD.

cvFILED  
014:00 AM  
JUL 15 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100558  
NO: 05-847-CD  
SERVICE # 2 OF 2  
COMPLAINT

PLAINTIFF: SARMUKH SINGH  
vs.  
DEFENDANT: ANTHONY J. BLANCHARD and JENKINS TRANSPORT, INC.

**SHERIFF RETURN**

NOW, June 16, 2005 MAILED THE WITHIN COMPLAINT TO JENKINS TRANSPORT, INC. DEFENDANT AT 97 OLD DIXIE HIGHWAY, ADAIRSVILLE, GA, 30103 BY CERTIFIED MAIL # 7004 1350 0004 9672 6013. THE MAILING IS HERETO ATTACHED MARKED NOT DELIVERABLE AS ADDRESSED.

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	COLAVECCHI	8358	20.00
SHERIFF HAWKINS	COLAVECCHI	8358	32.67

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*  
*by Marilyn Hause*  
Chester A. Hawkins  
Sheriff

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

10255F

02

**SENDER: 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:**

ANTHONY J. BLANCHARD  
178 Melissa Drive  
Bainbridge, GA. 31717

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature <i>X Anthony Blanchard</i>	Agent <i>✓ Addressee</i>
B. Received by <i>Anthony Blanchard</i>	C. Date of Delivery <i>10/20/05</i>
D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

3. Service Type
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

2. Article Number (Transfer from service label)	7004 1350 0004 9672 6006
--	--------------------------

102595-02-M-1540

Domestic Return Receipt

PS Form 3811, February 2004

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

9006 2266 0000 1350 4000 7	BAINBRIDGE, GA 39817	\$4.65	
	Certified Fee		\$0.60
	Return Receipt Fee (Endorsement Required)		\$2.30
	Restricted Delivery Fee (Endorsement Required)		\$1.75
	Total Postage & Fees		\$0.00 5.65
			06/16/2005
<b>Sent To</b> ANTHONY J. BLANCHARD			
Street, Apt. No.; or PO Box No. 178 Melissa Drive			
City, State, ZIP+4 Bainbridge, GA 31717-39817			
PS Form 4800, June 2005		See Reverse for Instructions	

**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

**Important Reminders:**

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**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.

100558

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

ADAIRSVILLE GA 30103

Postage	\$ 0.60
Certified Fee	\$2.30
Return Receipt Fee (Endorsement Required)	\$1.75
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 4.65

0830  
07 Postmark  
Here

06/16/2005

*Sent To*

JENKINS TRANSPORT INC
Street, Apt. No., or PO Box No. 97 Old Dixie Highway
City, State, ZIP+4 Adairsville, GA. 30103

PS Form 3800, June 2000 [www.usps.com](http://www.usps.com) [For Previous Instructions](http://www.usps.com/certifiedmailinstructions)

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100558

CHESTER A. HAWKINS

SHERIFF

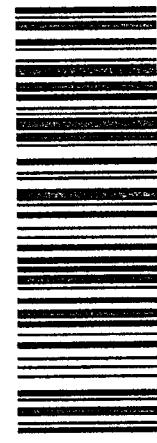
COURTHOUSE

1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLLOWING DOTTED LINE

**CERTIFIED MAIL™**



7004 1350 0004 9672 6013



JENKINS TRANSPORT, INC.  
97 OLD DIXIE HIGHWAY  
ADAIRSVILLE, GA 30103

WTF

NIXIE 300 1 24 06/24/05  
NOT RETURNABLE TO SENDER  
AS ADDRESSED  
UNABLE TO FORWARD  
BC: 16830243801 \*1991-01210-24-32  
168302438

**SENDER: COMPLETE THIS SECTION****COMPLETE THIS SECTION ON DELIVERY**

- 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:**

JENKINS TRANSPORT INC.  
97 Old Dixie Highway  
Adairsville, GA. 30103

A. Signature  Agent  
 Addressee

B. Received by (Printed Name)  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)**

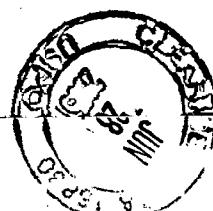
Yes

2. Article Number  
*(Transfer from service label)* **7004 1350 0004 9672 6013**

102555-02-M-1540

PS Form 3811, February 2004

Domestic Return Receipt



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

COMPLAINT

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

*Paul Colavecchi*

PAUL COLAVECCHI, ESQUIRE

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

JUN 15 2005

Attest.

*John L. Gray*  
Prothonotary/  
Clerk of Courts

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

SARMUKH SINGH,

Plaintiff : No. 05 - - CD

Vs.

ANTHONY J. BLANCHARD and  
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
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SARMUKH SINGH,

Plaintiff : No. 05 - - CD

Vs.

ANTHONY J. BLANCHARD and,  
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Defendants:

**COMPLAINT**

1. Plaintiff is Sarmukh Singh an individual residing at 6806 Trade Winds, Bakersfield, California 93307.

2. Defendants are:

a. Anthony J. Blanchard an individual residing at 178 Melissa Drive, Bainbridge, Georgia 31717; and,

b. Jenkins Transport, Inc., which is the employer of Defendant having its principal address at 97 Old Dixie Highway, Adairsville, Georgia 30103.

3. On or about August 3, 2003, Plaintiff was operating a 1987 Peterbuilt truck and was traveling eastbound on Interstate 80 in Clearfield, Pennsylvania.

4. On that same date and time, Defendant was operating a 1984 International truck traveling eastbound on Interstate 80 in Clearfield County, Pennsylvania.

5. Defendant was traveling directly behind Plaintiff in the left lane of traffic, traveling eastbound, in the same direction.

6. While traveling, Plaintiff was forced to stop for traffic because all traffic in the left bound lane had stopped.

7. Defendant was operating his vehicle directly behind Plaintiff's vehicle and failed to stop, thus striking the rear of Plaintiff's vehicle.

8. Following the accident, the Defendant was cited for following too closely, pursuant to 3310(a) of the Pennsylvania Motor Vehicle Code and the impact of the accident caused damage to Plaintiff vehicle's and injuries to Plaintiff.

**COUNT I**

***SARMUKH SINGH VS. ANTHONY J. BLANCHARD***

Paragraphs 1 through 8 are incorporated herein by reference thereto.

9. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant, Anthony J. Blanchard, in any or all of the following respects:

- a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;
- b. In failing to have the vehicle under proper control;
- c. In continuing to operate the vehicle in a direction toward Plaintiff's vehicle when the Defendant saw or in the

exercise of reasonable diligence should have seen that further operation in that direction would result in a collision;

      d. In that the driver was inattentive and failed to maintain a sharp lookout of the road and the surrounding traffic conditions;

      e. In failing to operate the brakes in such a manner so that the vehicle could be stopped in time to avoid a collision;

      f. In violating the various statutes and municipal ordinances pertaining to the operation of motor vehicles on public thoroughfares under the circumstances;

      g. In failing to maintain a reasonable lookout for the presence of other motor vehicles on the road;

      h. In failing to avoid hitting Plaintiff's vehicle when the driver saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant; and,

      i. In operating his vehicle too close to that Plaintiff's vehicle.

10. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to his bones, muscles, tissues and ligaments, shock and injury to the nerves and nervous system and particularly injuries to his back and legs.

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- b. Said Plaintiff has been and will be required to expend sums of money for surgical and medical attention, medical supplies, medicines and attendant services;
- c. Said Plaintiff's general health, strength and vitality have been impaired; and,
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12. By further reason of said collision, Plaintiff has been damaged as follows:

- a. Plaintiff lost business revenue for the time he was unable to work and until he could rent a trailer from August 3, 2003, to September 7, 2003, in the amount of Seven Thousand One Hundred Fifty-eight Dollars (\$7,158.00);

- b. Plaintiff had to rent a trailer from September 8, 2003, to November 15, 2003, while his trailer was being repaired at the rate of One Thousand One Hundred Dollars (\$1,100.00) per month for a total of Three Thousand Three Hundred Dollars (\$3,300.00);

WHEREFORE, Plaintiff brings this action against Defendant to recovery damages in excess of the Board of Arbitrators of this Court and in excess of Twenty-five Thousand Dollars (\$25,000.00).

**COUNT II**

***SARMUKH SINGH VS. JENKINS TRANSPORT, INC.***

Paragraphs 1 through 8 are incorporated herein by reference thereto.

13. At all times relevant hereto, the Defendant, Jenkins Transport, Inc., was acting by and through its servant, agents, and employees, who were then and there engaged upon the performance of their duties, within the scope of their employment and upon the business of the Defendant. Specifically Anthony J. Blanchard is an employee of Defendant and was acting within the scope of his employment.

14. The injuries and damages hereinafter set forth were caused solely by and were the direct and proximate result of the negligence of the Defendant, Anthony J. Blanchard, in any or all of the following respects:

- a. In operating the vehicle at a high, dangerous and reckless speed under the circumstances;
- b. In failing to have the vehicle under proper control;
- c. In continuing to operate the vehicle in a direction toward Plaintiff's vehicle when the Defendant saw or in the exercise of reasonable diligence should have seen that further operation in that direction would result in a collision;

d. In that the driver was inattentive and failed to maintain a sharp lookout of the road and the surrounding traffic conditions;

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f. In violating the various statutes and municipal ordinances pertaining to the operation of motor vehicles on public thoroughfares under the circumstances;

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h. In failing to avoid hitting Plaintiff's vehicle when the driver saw or should have seen that Plaintiff's vehicle was on the road in full view of the Defendant; and,

i. In operating his vehicle too close to that Plaintiff's vehicle.

15. Solely as a result of the negligence of the Defendant as aforesaid, Plaintiff sustained various injuries to his bones, muscles, tissues and ligaments, shock and injury to the nerves and nervous system and particularly injuries to his back and legs.

16. As a result of the injuries, Plaintiff has sustained the following damages:

a. Said Plaintiff has suffered and will suffer great pain, suffering, inconvenience, embarrassment and mental anguish;

b. Said Plaintiff has been and will be required to expend sums of money for surgical and medical attention, medical supplies, medicines and attendant services;

c. Said Plaintiff's general health, strength and vitality have been impaired; and,

d. Said Plaintiff has been and will be deprived of earnings.

17. By further reason of said collision, Plaintiff has been damaged as follows:

a. Plaintiff lost business revenue for the time he was unable to work and until he could rent a trailer from August 3, 2003, to September 7, 2003, in the amount of Seven Thousand One Hundred Fifty-eight Dollars (\$7,158.00);

b. Plaintiff had to rent a trailer from September 8, 2003, to November 15, 2003, while his trailer was being repaired at the rate of One Thousand One Hundred Dollars (\$1,100.00) per month for a total of Three Thousand Three Hundred Dollars (\$3,300.00);

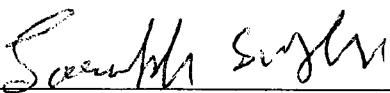
WHEREFORE, Plaintiff brings this action against Defendant to recovery damages in excess of the Board of Arbitrators of this Court and in excess of Twenty-five Thousand Dollars (\$25,000.00).

  
PAUL COLAVECCHI, ESQUIRE

AW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
11 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

**VERIFICATION**

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
SARMUKH SINGH

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

VS.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

**PRAECIPE TO ENTER DEFAULT  
JUDGMENT**

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

FILED Atty pd. 20.00  
01/31/05 Notice to Def.  
SEP 29 2005 Statement to  
William A. Shaw  
Prothonotary Clerk of Courts  
610

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

SARMUKH SINGH, :  
Plaintiff : No. 05 - 847 - CD  
:  
Vs. :  
:  
ANTHONY J. BLANCHARD and JENKINS :  
TRANSPORTATION, INC., :  
Defendants:

**PRAECIPE TO ENTER DEFAULT JUDGMENT**

TO: WILLIAM A. SHAW, PROTHONOTARY

1. More than twenty (20) days have elapsed since service on Anthony J. Blanchard, Defendant, and he has failed to file responsive pleadings.

2. Plaintiff's counsel sent the notice required by Pa. R.C.P. 237.1 to Anthony J. Blanchard more than ten (10) days ago, and the Defendant has not filed an Answer or responsive pleadings.

3. A true and correct copy of said Rule 237.1 notice is attached hereto and incorporated herein by reference.

4. Plaintiff, Sarmukh Singh, prays this Honorable Court to enter judgment in his favor and against the Defendant, Anthony J. Blanchard, as to the issue of liability.

5. The amount of the judgment will be determined by this Court in the original proceedings against the Defendant, Anthony J. Blanchard, brought by Plaintiff, Sarmukh Singh.

Respectfully submitted,

Paul Colavecchi

PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff

9/29/05

Date

AFFIDAVIT

PAUL COLAVECCHI, ESQUIRE, being duly sworn according to law, deposes and states as follows:

The last known address of judgment creditor is 6806 Trade Winds, Bakersfield, California 93307.

The last known address of judgment debtor is 178 Melissa Drive, Bainbridge, Georgia 31717.



---

PAUL COLAVECCHI, ESQUIRE

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

SARMUKH SINGH,

Plaintiff : No. 05 - 847 - CD

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendant :

TO: ANTHONY J. BLANCHARD  
178 Melissa Drive  
Bainbridge, GA 31717

DATE OF NOTICE: August 25, 2005

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

COURT ADMINISTRATOR'S OFFICE  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830  
814/765-2641, Ext. 5982

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

*Paul Colavecchi*  
PAUL COLAVECCHI, ESQUIRE  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830  
814/765-1566

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

 COPY

SARMUKH SINGH, \_\_\_\_\_  
\_\_\_\_\_  
VS. : NO. 05 - 847 - CD  
Plaintiffs  
\_\_\_\_\_  
ANTHONY J. BLANCHARD and \_\_\_\_\_  
JENKINS TRANSPORT, INC., \_\_\_\_\_  
\_\_\_\_\_  
Defendants

**NOTICE OF FILING JUDGMENT**

( X ) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$To Be Determined on September 29, 2005.

( ) A copy of all documents filed with the Prothonotary in support of the within Judgment is/are enclosed.

\_\_\_\_\_  
PROTHONOTARY

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

If you have any questions regarding this Notice, please contact the filing party:

Name: Paul Colavecchi, Esquire  
Address: 221 East Market Street  
Clearfield, PA 16830  
Telephone Number: 814/765-1566

(This Notice is given in accordance with PA R.C.P. 236)

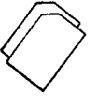
Notice sent to:

Name: Anthony J. Blanchard  
Address: 178 Melissa Drive  
Bainbridge, Georgia 31717

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

Sarmukh Singh  
Plaintiff(s)

No.: 2005-00847-CD

 COPY

Real Debt: TO BE DETERMINED

Atty's Comm: \$

Vs.

Costs: \$

Anthony J. Blanchard  
Jenkins Transport, Inc.  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment against Anthony  
J. Blanchard ONLY

Date of Entry: September 29, 2005

Expires: September 29, 2010

Certified from the record this 29th day of September, 2005.

---

William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

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

---

Plaintiff/Attorney

ZARWIN, BAUM, DEVITO, KAPLAN, SCHAER & TODDY, P.C.

By: Thomas J. McPherson, Esquire  
Identification Number: 63843  
1515 Market Street, Suite 1200  
Philadelphia, PA 19102  
(215) 569-2800  
[thmpherson@zarwin.com](mailto:thmpherson@zarwin.com)

Attorney for Defendants,  
Anthony J. Blanchard and  
Jenkins Transport, Inc.

---

SARMUKH SINGH,

Plaintiff

: COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
CIVIL DIVISION

v.

: NO. 05-847-CD

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.

Defendants

---

**ENTRY OF APPEARANCE**

**TO THE PROTHONOTARY:**

Kindly enter my appearance on behalf of Defendants, Anthony J. Blanchard and Jenkins Transport, Inc., in the above-referenced matter.

**ZARWIN, BAUM, DeVITO, KAPLAN,  
SCHAER & TODDY, P.C.**

BY: 

**THOMAS J. McPHERSON, ESQUIRE  
ATTORNEY FOR DEFENDANTS**

**FILED** *no cc*  
*7/12/2005*  
**AUG 24 2005** *JS*

William A. Shaw  
Prothonotary/Clerk of Courts

ZARWIN, BAUM, DEVITO, KAPLAN, SCHAER & TODDY, P.C. ,

By: Thomas J. McPherson, Esquire

Identification Number: 63843  
1515 Market Street, Suite 1200  
Philadelphia, PA 19102  
(215) 569-2800  
[thmpherson@zarwin.com](mailto:thmpherson@zarwin.com)

Attorney for Defendants,  
Anthony J. Blanchard and  
Jenkins Transport, Inc.

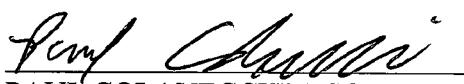
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SARMUKH SINGH, :  
Plaintiff :  
v. :  
: COURT OF COMMON PLEAS  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. : CLEARFIELD COUNTY  
Defendants : CIVIL DIVISION  
: NO. 05-847-CD

---

**STIPULATION TO OPEN DEFAULT JUDGMENT**

AND NOW, this 31st day of August, 2006, IT IS  
HEREBY AGREED AND STIPULATED by and between counsel for Plaintiff, Paul  
Colavecchi, Esquire and counsel for Defendants, Thomas J. McPherson, Esquire, that the  
Default Judgment in the above-captioned matter be OPENED.

  
PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff  
Sarmukh Singh

  
THOMAS J. MCPHERSON, ESQUIRE  
Attorney for Defendants,  
Anthony J. Blanchard and  
Jenkins Transport, Inc.

**FILED**  
d. 9/11/06 2CC  
SEP 11 2006 Atty McPherson  
eck

William A. Shaw  
Prothonotary/Clerk of Courts

TO PLAINTIFF: You are hereby notified to plead to the enclosed Answer and New Matter within twenty (20) days of service thereof or default judgment may be entered against you.

By: 

ZARWIN, BAUM, DEVITO, KAPLAN, SCHAER & TODDY, P.C.

By: Thomas J. McPherson, Esquire  
Identification Number: 63843  
1515 Market Street, Suite 1200  
Philadelphia, PA 19102  
(215) 569-2800  
[thmpherson@zarwin.com](mailto:thmpherson@zarwin.com)

Attorney for Defendants,  
Anthony J. Blanchard and  
Jenkins Transport, Inc.

SARMUKH SINGH,  
Plaintiff

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
CIVIL DIVISION

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.  
Defendants

NO. 05-847-CD

**ANSWER OF DEFENDANTS, ANTHONY J. BLANCHARD AND JENKINS TRANSPORT, INC., TO PLAINTIFF'S COMPLAINT WITH NEW MATTER**

Defendants, Anthony J. Blanchard and Jenkins Transport, Inc., by and through counsel, Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy, P.C., herein answer Plaintiff's Complaint and assert New Matter in accordance with the numbered paragraphs as follows:

1. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

2. (a.) and (b.) Admitted.

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S  
William A. Shaw  
Prothonotary/Clerk of Courts

3. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

4. Admitted.

5. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

6. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

7. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

8. Denied. After reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments in this paragraph of Plaintiff's Complaint, and therefore, deny same and demand strict proof thereof at trial.

**COUNT I**

9. (a.) through (h.) Denied. The allegations contained in this paragraph are conclusions of law to which the Pennsylvania Rules of Civil Procedure require no responsive pleadings and are therefore denied. By way of further answer, Answering Defendants deny that they were careless, reckless and/or negligent and further deny that they committed any of the acts or omissions as alleged by Plaintiff in the corresponding paragraph of his Complaint. Strict proof thereof is demanded at trial.

10. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

11. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

12. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

WHEREFORE, Answering Defendants deny that they are liable to the Plaintiff and demand judgment in their favor together with costs and attorney's fees.

**COUNT II**

13. Admitted.

14. (a.) through (i.) Denied. The allegations contained in this paragraph are conclusions of law to which the Pennsylvania Rules of Civil Procedure require no responsive pleadings and are therefore denied. By way of further answer, Answering Defendants deny that they were careless, reckless and/or negligent and further deny that they committed any of the acts or omissions as alleged by Plaintiff in the corresponding paragraph of his Complaint. Strict proof thereof is demanded at trial.

15. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

16. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

17. Denied. Answering Defendants have no knowledge or means of ascertaining the truth or falsity of the averments respecting the injuries, sufferings, and/or damages alleged to have been sustained by Plaintiff and the same are accordingly denied and strict proof thereof is demanded at the trial of this case.

WHEREFORE, Answering Defendants deny that they are liable to the Plaintiff and demand judgment in their favor together with costs and attorney's fees.

## **NEW MATTER**

By way of New Matter, Answering Defendants aver the following:

18. If an accident occurred in the manner alleged by the Plaintiff, then such accident occurred as a result of the negligence of the Plaintiff Sarmukh Singh, and under the terms of the Comparative Negligence Act of 1976, 42 Pa. C.S.A. 7102 et seq., the Plaintiff is not entitled to recover from Answering Defendants or the recovery is to be reduced in accordance with the terms of the aforesaid Act.

19. If it is judicially determined that the Plaintiff suffered any injuries and/or damages as a result of the accident as alleged in Plaintiff's Complaint, then such damages were proximately caused by the negligence of Plaintiff Sarmukh Singh.

20. If the Plaintiff suffered any injuries/damages as alleged, they were caused solely and primarily by Plaintiff's own carelessness, recklessness, negligence, or contributory negligence.

21. By the actions at the date, time and place stated in the Plaintiff's Civil Action-Complaint, the Plaintiff did knowingly assume the risk of any and all injuries or damages which he is alleged to have suffered.

22. It is averred that the appropriate Statute of Limitations has elapsed since the accrual of the causes of action and the institution of suit. The instant action is thus barred by the applicable Statute of Limitations.

23. It is further averred that if Plaintiff sustained injuries and damages as alleged in his Complaint, they were due solely to the fact that Plaintiff violated Federal statutes, State statutes and/or City ordinances.

24. Plaintiff's Complaint fails to state a cause of action upon which relief can be granted.

25. All allegations pertaining to jurisdiction are denied and strict proof thereof is demanded at the trial of this case.

26. At all times concerned with this litigation, Answering Defendants acted in a manner which was proper, reasonable, lawful and in the exercise of good faith.

27. Plaintiff's Complaint in Civil Action avers that Plaintiffs sustained personal injuries on August 3, 2003. Answering Defendants claim all of the immunities and defenses provided by the Motor Vehicle Financial Responsibility Law of February 12, 1984. Pursuant to the Motor Vehicle Financial Responsibility Law of February 12, 1984, as amended, 75 Pa. C.S.A. 1701, et seq., Plaintiff is precluded from pleading or introducing into evidence or recovering the amounts of the coverages set forth. Plaintiff's action is barred or limited by the limited tort option of the Motor Vehicle Financial Responsibility Law of February 12, 1984, as amended, 75 Pa. C.S.A. 1701, et seq., as Plaintiff has not sustained a serious injury.

28. If applicable, Plaintiff is precluded from recovering any first party benefits, workers compensation benefits or health care benefits under a program, group contract or other arrangement, paid or otherwise payable, in the context of this third party liability claim pursuant to 75 Pa. C.S.A. §1719.

29. On November 7, 1988 the Pennsylvania Supreme Court promulgated amended Pennsylvania Rule of Civil Procedure 238, hereinafter "Rule 238" with an immediate effective date.

30. Rule 238, on its face and as applied, violates the due process and equal protection clauses of the Fourteenth Amendment to the United States Constitution; 42 U.S.C.A. Section 1983 of the Civil Rights Acts; Article I, Sections 1, 6, 11, 26; and Article IV, Section 10(c) of the Pennsylvania Constitution.

31. If there is a judicial determination that Rule 238 is constitutional, then liability for any interest imposed by this rule should be suspended during the period of time that Plaintiff fails to convey to the Defendants a settlement demand figure, delays in responding to discovery, delays in producing requests made by the Defendants, and as a result of any delay, the Plaintiff should be estopped from obtaining interest because of any violation of the discovery rules.

32. Plaintiff has failed to mitigate his damages.

33. If Plaintiff sustained injuries as alleged in his Complaint, said injuries being expressly denied, then said injuries were not caused by any act or failure to act by Defendants.

34. Plaintiff's claims are barred by the terms and provisions of the Pennsylvania Worker's Compensation Act, as amended.

35. Plaintiff's claims are barred or limited by the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Act and/or the Statutes of the Commonwealth of Pennsylvania and Defendant incorporates all defenses available under said Act or Statutes as though the same were set forth more fully at length herein.

36. At all times material or relevant hereto, Defendants acted, with reference to the motor vehicle in question, in a reasonable and proper manner under the attending circumstances and in compliance with all provisions of Pennsylvania law.

37. Answering Defendants reserves the right to amend their Answer with New Matter to Plaintiff's Complaint to include any defenses which may become available during the course of discovery.

**ZARWIN, BAUM, DeVITO, KAPLAN,  
SCHAER & TODDY, P.C.**

BY:

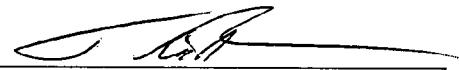
  
**THOMAS J. MCPHERSON, ESQUIRE**  
Attorney for Defendants

DATED 9/18/06

**VERIFICATION**

THOMAS J. MCPHERSON, ESQUIRE, hereby states that he is the attorney for the Defendants in this action and verifies that the statements made in the foregoing Answer to Plaintiff's Complaint are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements made therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

**ZARWIN, BAUM, DeVITO, KAPLAN,  
SCHAER & TODDY, P.C.**

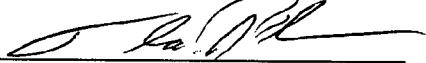
BY:   
**THOMAS J. MCPHERSON, ESQUIRE**

## **CERTIFICATE OF SERVICE**

I hereby certify that service of a true and correct copy of the foregoing Answer to Plaintiff's Complaint was made on this date by first-class mail, postage pre-paid to the following:

Paul Colavecchi, Esquire  
COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

**ZARWIN, BAUM, DeVITO, KAPLAN,  
SCHAER & TODDY, P.C.**

BY:   
**THOMAS J. MCPHERSON, ESQUIRE**

DATED: 9/18/06

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

**ANSWER TO NEW MATTER**

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

**FILED**

SEP 29 2006

0/12:55 AM @  
William A. Shaw

Prothonotary/Clerk of Courts

3 WENT TO ATT

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

SARMUKH SINGH, :  
Plaintiff : No. 05 - 847 - CD  
:  
Vs. :  
:  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC., :  
Defendants:

**ANSWER TO NEW MATTER**

NOW COMES, the Plaintiff, Sarmukh Singh, who, through his attorney, Paul Colavecchi, Esquire, and files his Answer to the New Matter of Defendants and respectfully avers as follows:

18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. This is a statement of law and does not require an answer.
26. Denied.
27. Admitted in part and denied in part. It is admitted that Plaintiff's Complaint in a civil action avers that Plaintiff sustained personal injuries on August 3, 2003. It is denied that

Plaintiff's claim is limited by the limited tort option of the Motor Vehicle Financial Responsibility Law because Plaintiff and Defendant reside in different states.

28. This is a statement of law and does not require an answer.

29. This is a statement of law and does not require an answer.

30. This paragraph does not require an answer.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied in part. It is denied that Plaintiff's claims are barred or limited by provision of the Pennsylvania Motor Vehicle Financial Responsibility Act and/or the Statutes of the Commonwealth of Pennsylvania. The remainder of this paragraph does not require an answer.

36. Denied.

37. This paragraph does not require an answer.

WHEREFORE, Plaintiff respectfully requests that your Honorable Court dismiss the New Matter of Defendants and enter judgment in his favor, together with costs.

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

  
PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff

**VERIFICATION**

I, Paul Colavecchi, Esquire, hereby states that he is attorney for the Plaintiff and verifies that the statements made in this Answer are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

  
PAUL COLAVECCHI

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

**MOTION TO COMPEL ANSWERS TO  
INTERROGATORIES**

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

FILED 3cc  
03/06/2007 Atty Colavecchi  
MAR 06 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

SARMUKH SINGH,

Plaintiff : NO. 05 - 847 - CD

vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants:

**MOTION TO COMPEL ANSWERS  
TO INTERROGATORIES**

NOW COMES, Sarmukh Singh, Plaintiff above named, who, through his attorney, Paul Colavecchi, Esquire, files this Motion to Compel Answers to Interrogatories and respectfully avers as follows:

1. Plaintiff filed a Complaint in the Court of Common Pleas of Clearfield County on or about June 15, 2005.
2. On or about November 4, 2006, Plaintiff served Interrogatories on the Defendants, a copy of said Interrogatories are attached hereto and marked Exhibit "A".
3. As of this date, Plaintiff has not received Answers to these Interrogatories. A reminder letter was sent to Thomas J. McPherson, attorney for the Defendants, on January 10, 2007. No response was received to said letter.
4. Pennsylvania Rule of Civil Procedure Rule 4006, entitled Answers to written Interrogatories by a party, sets forth that the

answering party shall serve a copy of the Answers and objections, if any, within 30 days after service of the Interrogatories.

5. Pennsylvania Rule of Civil Procedure 4019, entitled Sanctions, sets forth that the Court may on motion make an appropriate order of party fails to serve answers, sufficient answers or objections to written Interrogatories under Rule 4005.

6. Plaintiff seeks an Order from the Court compelling the Defendants to file and serve Answers to Interrogatories upon Plaintiff within 20 days of the hearing date on this Motion.

WHEREFORE, Plaintiff respectfully requests your Honorable Court issue an Order directing Defendants to file Answers to the Interrogatories.

Respectfully submitted,

  
PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff

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

SARMUKH SINGH,

Plaintiff : No. 05 - 847 - CD

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants:

***PLAINTIFF'S INTERROGATORIES  
FOR ANSWER BY DEFENDANTS***

TO: ANTHONY J. BLANCHARD  
JENKINS TRANSPORT, INC.  
c/o THOMAS J. MCPHERSON  
Attorney at Law  
1515 Market Street, Suite 1200  
Philadelphia, PA 19102

Please take notice that you are hereby required pursuant to the Pennsylvania Rules of Civil Procedure, to serve upon the undersigned, within thirty (30) days from service hereof, your Answers to the Interrogatories provided by Plaintiff in writing and under oath.

These shall be deemed to be continuing Interrogatories. If, between the time of your answers and the time of trial of this case, you or anyone acting on your behalf learn of any further

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information not contained in your answers, you shall promptly furnish said information to the undersigned by supplemental answers.



---

PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830  
814/765-1566

Dated: 11/3/06

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DEFINITIONS

A. "You" and/or "your" means Defendants, their agents and employees, and others acting on their behalf, with regard to defending the cause of action which is set forth in Plaintiff's Complaint in the above-captioned case.

B. "Document" shall mean any writing (whether handwritten, typed, printed or otherwise made), drawing, graph, chart, photograph, phonograph record, or mechanical matter (including microfilm of any kind or nature, tape or recording), or other data compilations from which information can be obtained (translated, if necessary, by Plaintiff, Sarmukh Sinth, through detection devices into reasonably usable form), and shall include, without limiting the generality of the foregoing, all records, correspondence, telegrams, teletypes, agreements, studies, reports, drafts, memoranda, and computer print outs.

C. As used herein, "identify", when used in reference to an individual, means his full name and present or last known residence and business address, his present or last known position or title and business affiliation, and his position at the time in question.

D. "Health care provider" means a person, corporation, facility, institution or other entity licensed or approved by the Commonwealth to provide health care or professional services as a physician, including a medical doctor and a doctor of osteopathy and a doctor of podiatry; hospital; nursing home; health

maintenance organization; or an officer, employee or agent of any of them acting in the course and scope of his employment

Where the Interrogatories request that documents be identified, an identification of it should include at least the following: author, addressee, type of document, date, subject matter, and the name and address of the person or party presently having custody of the document and any known copies of it.

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Instructions for Answering Interrogatories

A. In accordance with Pa. R.C.P. Rule 4005, the original and two (2) copies of these written Interrogatories have been served upon you to be answered by the party served. If the party served is a public or private corporation or similar entity or a partnership or association, by any officer or agent, who shall furnish such information as is available to the party.

B. In accordance with Pa. R.C.P. Rule 4006, written answers shall be inserted in the spaces provided in the Interrogatories. If there is insufficient space to answer an Interrogatory, the remainder of the answer shall follow on a supplemental sheet.

C. In accordance with Pa. R.C.P. Rule 4006(b), a sufficient answer to such an Interrogatory shall be to specify the records from which the answer may be derived or ascertained.

D. Please serve these answers to Interrogatories in accordance with the Pa. Rules of Civil Procedure.

INTERROGATORIES

1. Please identify yourself fully, giving your full name, age, social security number, residence address, business address, and occupation, and if married, give the name of your spouse.

2. Please describe in complete detail your present employment and occupation, stating:

(a) The name and address of your employer and your immediate supervisor, if any;

(b) Your job description and title;

(c) Your duties and responsibilities;

(d) The date you started work with your present employer; and,

(e) All training you have had for your present occupation.

3. Have you lost any time from your business or occupation since the accident referred to in this Complaint and if so, state:

(a) The cause of such loss of time;

(b) The number of days lost and the dates;

(c) The amount of any income or wages lost.

4. Are you now receiving or have you ever received any disability pension, income or insurance or any workers' compensation from any agency, company, person, corporation, state of government? If so, state:

(a) The nature of such payment;

(b) Dates you received such income;

(c) For what injuries or disabilities you received it, and how such injury occurred or disability arose;

(d) By whom paid;

(e) Whether you now have any present disability as a result of such injuries or disability and if so, state the nature and extent of such disability;

(f) Whether you had any disability at the time of the accident referred to in the Complaint and if so, the nature and extent of such disability.

5. Have you made claim for any benefits under any medical pay coverage or policy of insurance relating to injuries arising out of the accident alleged in the Complaint?

6. Please describe in full detail how the occurrence happened, giving all events in detail in the order in which they occurred, before, during and after the occurrence, which had any bearing on the cause and manner of the happening of the occurrence.

7. At the time of the alleged occurrence, were there any restrictions, qualifications, or conditions contained on your motor vehicle operator's license?

8. If your eyesight or vision in either eye at the time of the alleged occurrence was below normal without the use of eyeglasses or other corrective lenses, please state:

(a) The nature and extent of the limitation of your vision below normal in your right eye; and,

(b) The nature and extent of the limitation of your vision below normal in your left eye.

9. Please state the extent to which you were familiar with the location of the alleged occurrence at the time of the alleged occurrence.

10. Please identify any occupants of your vehicle who saw some or all of the events preceding, during or subsequent to the occurrence.

11. Please identify and describe the appearance of each and every person known who observed, or was present in the vicinity of, the alleged occurrence, giving the name and address of each such person if known to you.

12. Please identify any witnesses, giving the name, address and telephone number of each person, who will testify at trial.

13. If any of the witnesses listed in Interrogatory No. 11 or whom you propose to use at trial are related to you or to each other, please state the nature of such relationship.

14. If you claim that any other person or persons contributed to cause the alleged occurrence, please state the name of each such person and the manner in which he/she contributed to the alleged occurrence.

15. State the full name and last known address, giving the street, street number, city and state, of every witness known to you or your attorneys or who claim to have seen or heard the Plaintiff make any statement or statements pertaining to any of the events or happenings alleged in the Complaint.

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16. At the time and place of the alleged occurrence, were there any police officers, crosswalk guards, traffic directions, etc., nearby? If so, please describe.

(a) The identity of the person who inspected your vehicle most recently preceding the alleged occurrence.

(b) The results of such inspection.

17. If any repairs were made to your vehicle within one year preceding the alleged occurrence, please give full details of such repairs, including:

(a) A description of each such repair and the mechanical problem that was repaired;

(b) The date of each such repair;

(c) The identity of the person who made each such repair;

(d) Any instructions, directions or comments given to you by any repairman.

18. Please state whether there were any police officers, ambulances or tow-trucks present at the place of the occurrence, identifying which.

19. If anyone involved in the alleged occurrence was brought to a hospital soon after the alleged occurrence, please identify each person and such hospital.

20. Please give the name and address of the person, firm or corporation responsible for any excavation/construction near the place of the occurrence.

21. At the time of the alleged occurrence, had you ever had your motor vehicle operator's license revoked, suspended or withdrawn by the licensing authority?

22. Please state exactly where the occurrence happened, including names of cities or towns, names and numbers of streets, and other named or readily identifiable landmarks, buildings, or fixed objects.

23. Please describe as accurately as you can the location where the alleged occurrence happened, giving the distance in feet from the nearest other roadway or highway, whether intersection, driveway, entrance, exit ramp or otherwise.

24. Please describe as fully as possible the condition of the road at the time and location of the alleged occurrence, setting forth the type of surface material, the general upkeep or condition of the road, any holes or defects in the road, the amount of any accumulated precipitation, the nature of such precipitation, a description of the slipperiness of the road surface, and the amount and type of any foreign substance or debris on the roadway.

25. Please describe the location of the alleged occurrence, stating:

(a) The approximate widths of all roadways or streets involved;

(b) All traffic signs, markings on pavement, or traffic control signals;

(c) The posted speed limit.

26. Please describe the road pattern in all directions from the point of the alleged occurrence, indicating all turns, hills and road conditions that might have obstructed your vision.

27. Please state the year, make, model and color of the vehicle owned, operated or occupied by you at the time of the alleged occurrence.

28. Please describe any objects in or on the vehicle owned, operated or occupied by you which may have partially blocked your vision, or the operator's vision, including such things as snow, frost, objects tied to the mirror, window stickers, animals, children, passengers, etc.

29. At the time of the alleged occurrence, was a trailer attached to your vehicle?

30. Please state every light with which your vehicle was equipped at the time of the alleged occurrence.

31. At the time of the alleged occurrence, was your body subject to any physical restraint of any kind, including a seat belt, a shoulder harness, a person holding you or otherwise?

32. Please state each warning device with which your vehicle was equipped at the time of the alleged occurrence which was operable at the time of the alleged occurrence.

33. Did you or any agent or employee of you have any knowledge of the existence of any defect or defective condition of your vehicle prior to the alleged occurrence?

34. Please describe any mechanical defect or other adverse condition of your vehicle at the time of the alleged occurrence which could in any way have affected its operation, including:

(a) A description of such defect or condition;

(b) The length of time prior to the occurrence that such defect or condition had existed.

35. Just prior to the alleged occurrence, was your attention distracted from the road ahead by anything whatsoever for any amount of time?

36. Please describe as completely as you can the lighting conditions at the time and place of the alleged occurrence, including the amount of natural light and/or the amount of artificial lighting, and the sources thereof.

37. Please describe in detail the location and movements of any other parked or moving vehicles in the vicinity of the occurrence, other than those directly involved in the occurrence, and state in what way, if any, such other vehicles were connected with or related to the occurrence.

38. Please describe fully and in complete detail all events which occurred from one hour before the alleged occurrence until the time of the occurrence, and please describe such events in sequential order.

39. Please state what, if any, traffic control signs, signals, or devices you observed at the time of the occurrence, within five (500) feet before you reached the place of impact.

40. Please describe fully and in complete detail the route you drove from one hour prior to the alleged occurrence until the occurrence.

41. Please describe each and every obstruction to your view or the view of the operator of your vehicle as your vehicle approached the place of the occurrence, giving the location of all such obstructions in relation to the point of impact.

42. Please describe as fully as possible the weather and road conditions at the time and location of the alleged occurrence, setting forth conditions of light, precipitation, and temperature.

43. Please state as accurately as you can the time when the alleged occurrence happened, stating the date, hour and minute as nearly as possible.

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44. Please describe fully and in complete detail any alcohol or drugs, prescription and non-prescription, which you ingested within twenty-four hours prior to the occurrence.

45. If during the three minute period immediately before impact you were engaged in any activity which required the use of one or both hands, such as smoking, adjusting equipment or touching some person or object, please described such conduct or activity in detail, setting forth:

(a) A complete description of each activity;

(b) The duration of each activity;

(c) How long in seconds before the occurrence such activity ended.

46. Please state where you were coming from and where you were going at the time of the alleged occurrence, giving in your answer the place where you last entered the vehicle and the place where you next intended to disembark from it.

47. Please describe any glasses or contact lenses worn by you at the time of the occurrence and describe any prescription for glasses you have ever had, naming the doctor prescribing them, the date prescribed, and the prescription.

48. At the time of the alleged occurrence, were you wearing dark, colored or sun glasses?

49. If at the time of the alleged occurrence the visibility of the highway at the place of the occurrence was limited or decreased from normal in any way due to any consideration of weather such as rain, snow, sleet, heavy cloudiness, glare of sunlight, etc., please describe in complete detail each and every such weather condition and every action taken to overcome or diminish the adverse effect of each such condition.

50. At the time of the alleged occurrence were the headlights of your motor vehicle turned on?

51. As the vehicle operated by you was approaching the point of the alleged occurrence, for what distance did you have a clear view?

52. With respect to each time the operator of your vehicle applied the brakes just prior to the alleged occurrence, please state:

(a) The speed in miles per hour at which the vehicle owned, operated or occupied by you was traveling;

(b) The distance in feet between the vehicle owned, operated or occupied by you and the vehicle with which your vehicle collided;

(c) The distance in feet the vehicle owned, operated or occupied by you traveled from the point where the brakes were applied to the point of impact;

(d) The distance in feet that the vehicle owned, operated or occupied by you traveled from the point where the brakes were applied to the point where the vehicle came to a full stop after impact.

53. Please state each and every act or action taken by you or by any agent or employee of you which was related in any way to the alleged occurrence.

54. Please state everything you or the operator of your vehicle did in the mechanical operation of your vehicle from the time you first saw the other vehicle up to the time of impact.

55. Please state everything you saw the party with whose vehicle your vehicle collided do up to the moment of impact, describing such party's entire conduct and action in detail.

56. Please state the movements of each vehicle, describing the course each vehicle took from the time you first saw the other vehicle up to the time of the alleged occurrence, describing in feet how far from the right-hand curb each vehicle was traveling, and stating whether either vehicle changed its direction, giving all details with respect thereto.

57. Please describe all the lights which were operating on each vehicle involved in the alleged occurrence at the time of the alleged occurrence.

58. Please describe fully and in complete detail any and all malfunctions that occurred in your vehicle at the time of the alleged occurrence.

59. Please state in detail everything you or any agent or employee of you did to avoid the alleged occurrence.

60. If there were any tire marks or any other marks on the road as a result of the occurrence, please describe such marks in detail, giving length in feet, location on the road surface, and identify which vehicle made each mark.

61. Please state the speed or different speeds of each vehicle involved in the alleged occurrence from the time you first saw the other vehicle up to the time of impact.

62. Please describe the position of both vehicles at the instant of first impact with each other, giving in your answer approximate distances in feet to nearby curbing or other fixed objects.

63. Please describe in detail any warning or signal given by you or the operator of any vehicle just prior to the time of the alleged occurrence.

64. With reference to the time when you first saw Plaintiff's vehicle, please state:

(a) The exact location of your vehicle, giving measurements to curbs and other fixed objects;

(b) The exact location of the Plaintiff's vehicle, giving measurements to curbs and other fixed objects;

(c) The distance between your vehicle and the Plaintiff's vehicle;

(d) The distance from your vehicle to the point of impact;

(e) The distance from the Plaintiffs' vehicle to the point of impact.

65. With reference to the time when both vehicles had come to a full stop after impact, please state:

- (a) The exact location of your vehicle, giving measurements to curbs and other fixed object;
- (b) The exact location of the Plaintiff's vehicle, giving measurements to curbs and other fixed objects;
- (c) The distance between your vehicle and the Plaintiff's vehicle;
- (d) The distance from your vehicle to the point of impact.

66. Please describe any other object struck by either vehicle, indicating its location, type, and the time when it was struck relative to the impact of the two vehicles.

67. Please state the time in minutes and seconds that elapsed between the time that the operator of your motor vehicle first observed the vehicle owned, operated or occupied by the Plaintiffs and the time of impact.

68. Please describe in full detail the points of contact between the vehicles, naming every part of each vehicle which was damaged.

69. If just prior to the impact you or the operator of your motor vehicle saw any brake light or directional signal light on the motor vehicle owned, operated, or occupied by the Plaintiffs, please state:

(a) A full and complete description of each such brake light or directional signal light, identifying whether left or right and whether blinking or steady;

(b) The distance in feet between the vehicles when the lights were first seen;

(c) The distance in feet from the front of the motor vehicle owned or operated by you, to the point of impact.

70. Please give the substance of any conversation you had with the other party after the alleged occurrence.

71. Please give an itemized account of all damages you claim were suffered by you as a result of the alleged occurrence.

72. Please describe all injuries, giving the size, appearance and position of any marks, cuts, bruises or blood, if any, that you or any agent or employee of you saw upon the other party or upon yourself immediately after the alleged occurrence.

73. Please describe fully and in complete detail any and all repairs and inspections done to your vehicle after the alleged occurrence.

74. Please state every act or omission on the part of the other party which contributed to cause the alleged occurrence.

75. Please describe fully and in complete detail each and every automobile accident in which you have been involved since the alleged occurrence.

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76. Please state the date and substance of each and every written statement or report prepared, submitted or made by you regarding the alleged occurrence.

77. Please state whether or not, to your knowledge or to the knowledge of any agent, employee, or attorney of yours, any statement in any form was obtained, secured, or received from any person regarding in any way the alleged occurrence.

78. If the answer to the preceding interrogatory is in the affirmative, please state:

(a) The name and address of the person, firm or corporation on whose behalf or for whose benefit any such statement was obtained, secured or received;

(b) The name and address of the person from whom any such statement was obtained, secured or received;

(c) The date of any such statement;

(d) The name and address of the person, firm or corporation now having possession or custody of any such statement.

79. For each expert witness you intend to call at the trial of this case, state the subject matter on which the expert is expected to testify.

80. Identify fully and completely each and every document which you intend to introduce into evidence at the trial of this case.

81. Identify each and every demonstrative exhibit, picture, object, model, movie, tape or other document which you intend to refer to during any witnesses' testimony at the trial of this case and for each, identify the witness(es) whom you intend to question concerning said exhibit.

82. State whether you are covered by any type of insurance, including any excess or umbrella insurance, in connection with this accident.

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83. If the answer is affirmative, state the following with respect to each policy:

(a) The name of the insurance carrier which issued each policy of insurance;

(b) The named insured under each policy and the policy number;

(c) The amount of coverage provided for injury to each person, for each occurrence, and in the aggregate, for each policy;

(d) Each exclusion, if any, in the policy, which is applicable to any claim thereunder and the reasons why you or the company claims the exclusion is applicable.

84. If you or any agent received notice of any kind from the Plaintiffs or someone on behalf of the Plaintiffs of the alleged occurrence, please give the date of receipt, the method by which such notice was given and the substance of such notice.

85. Did you receive any traffic citations as a result of the accident. If so, please list any and all traffic citations that were issued to you by law enforcement authorities as a result of the accident?

86. Were you charged with any offenses, including felony misdemeanors and summary offenses as a result of the accident? If so, please list any and all charges which were filed against you as a result of the accident and the classification of each charge.

87. Were any passengers in your vehicle injured as a result of the accident? If so, please state:

a. Name and address of the passenger;

b. List the extent of the injuries to the passenger to the best of knowledge.



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Attorney for Plaintiffs  
221 East Market Street  
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JOSEPH COLAVECCHI  
PAUL COLAVECCHI

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(814) 765-1566 or (800) 953-1566

FAX  
(814) 765-4570

January 10, 2007

Joseph W. Denneler  
Attorney at Law  
1515 Market Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19102-1981

In Re: Sarmukh Singh v. Anthony J. Blanchard and  
Jenkins Transport, Inc.; No. 05-847-CD  
Your File No. 21081

Dear Mr. Denneler:

In regard to the above-captioned action, Interrogatories  
were served on Thomas J. McPherson, Esquire, directed to Anthony  
J. Blanchard and Jenkins Transport, Inc. on November 4, 2007.

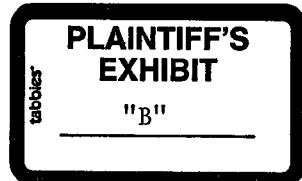
As of this date, no Answer has been received to the  
Interrogatories.

This is a reminder to please complete the Interrogatories  
and return them to my office to avoid any unnecessary filing of  
Motions.

Sincerely yours,

  
Paul Colavecchi

PC:1z



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,  
Plaintiff  
Vs.

CIVIL DIVISION  
No. 05 - 847 - CD

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,  
Defendants

**RULE**  
Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

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MAR 09 2007 Colavecchi  
CR

William A. Shaw  
Prothonotary/Clerk of Courts

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

SARMUKH SINGH,

Plaintiff : No. 05 - 847 - CD

vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants:

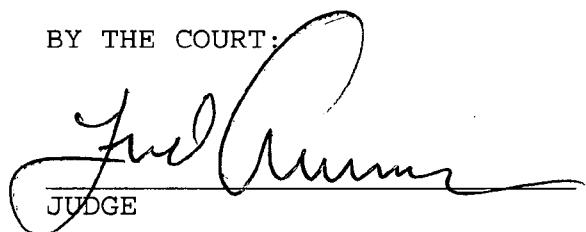
**RULE**

AND NOW, this 7 day of March, 2007, upon  
consideration of the foregoing Motion to Compel Answers to  
Interrogatories, a Rule is hereby issued directing the Defendants  
to appear and show cause the Motion should not be granted.

Rule made returnable the 23<sup>rd</sup> day of April,  
2007, at 9:00 A.M., Clearfield County Courthouse, Courtroom No.  
1.

One-half hour has been set aside for this hearing.

BY THE COURT:



JUDGE

FILED

MAR 09 2007

William A. Shaw  
Prothonotary/Clerk of Courts

DATE 3/9/07

You are responsible for serving all appropriate parties.

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

Plaintiff(s)    Plaintiff(s) Authority    Other   

Defendant(s)    Defendant(s) Authority   

Special Instructions:

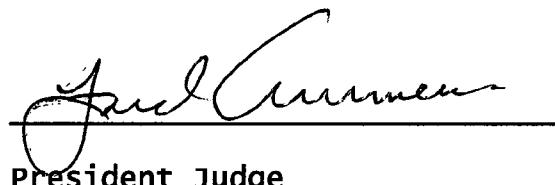
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

SARMUKH SINGH :  
-vs- : No. 05-847-CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :

O R D E R

AND NOW, this 23rd day of April, 2007, upon  
agreement of counsel for the parties, it is the ORDER of  
this Court that Plaintiff's Motion to Compel be and is  
hereby granted. Defendants shall have no more than thirty  
(30) days from this date to supply the requested  
information.

BY THE COURT,

  
\_\_\_\_\_  
President Judge

FILED *accsys: 0485764*  
APR 25 2007 P. Colavocchi  
McPherson  
William A. Shaw  
Prothonotary/Clerk of Courts *6K*

# FILED

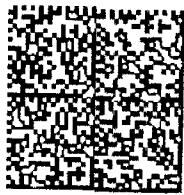
APR 25 2007

William A. Shaw,  
Prothonotary/Clerk of Courts

DATE: 4/25/07

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:

WILLIAM A. SHAW  
PROTHONOTARY  
and CLERK of COURTS  
P.O. BOX 549  
CLEARFIELD, PENNSYLVANIA 16830



016H16505405  
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04/25/2007  
Mailed From 16830  
Hastier  
US POSTAGE

Thomas J. McPherson  
1515 Market Street  
Philadelphia, PA 19102

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NIXIE  
RETURN TO SENDER  
ATTEMPTED - UNKNOWN  
UNABLE TO FORWARD  
BC: 16830054949 \*1173-20402-25-37  
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**FILED**

MAY 09 2007  
mlj2:30/07  
William A. Shaw  
Prothonotary/Clerk of Courts (CK)

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

SARMUKH SINGH :  
-vs- : No. 05-847-CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :

O R D E R

AND NOW, this 23rd day of April, 2007, upon  
agreement of counsel for the parties, it is the ORDER of  
this Court that Plaintiff's Motion to Compel be and is  
hereby granted. Defendants shall have no more than thirty  
(30) days from this date to supply the requested  
information.

BY THE COURT,

/S/ Fredric J Ammerman

President Judge

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

APR 25 2007

Attest.

*William L. Ober*  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SARMUKH SINGH :  
-vs- : No. 05-847-CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :

O R D E R

AND NOW, this 23rd day of April, 2007, upon  
agreement of counsel for the parties, it is the ORDER of  
this Court that Plaintiff's Motion to Compel be and is  
hereby granted. Defendants shall have no more than thirty  
(30) days from this date to supply the requested  
information.

BY THE COURT,

/S/ Fredric J Ammerman

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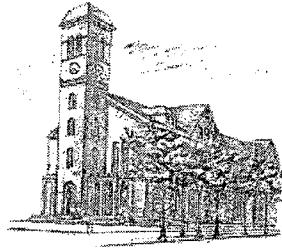
President Judge

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

APR 25 2007

Attest.

*William L. Ammerman*  
Prothonotary/  
Clerk of Courts



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

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

**Jacki Kendrick**  
Deputy Prothonotary/Clerk of Courts

**Bonnie Hudson**  
Administrative Assistant

**David S. Ammerman**  
Solicitor

PO Box 549, Clearfield, PA 16830 ■ Phone: (814) 765-2641 Ext. 1330 ■ Fax: (814) 765-7659 ■ [www.clearfieldco.org](http://www.clearfieldco.org)

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: 4/25/07

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 ACTION

SARMUKH SINGH, :  
Plaintiff :  
:   
vs. : No. 05 - 847 - CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :  
Defendant :

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 8, 2007, a true and correct copy of the Objection to Notice of Oral Deposition and Motion for counsel Fees and Expenses in the above matter was served on the following by facsimile and by depositing said copy in the United States Mail, first class, postage prepaid and addressed as follows:

Joseph W. Denneler, Esquire  
Zarwin Baum DeVito  
Kaplin Schaer Toddy, P.C.  
Attorneys at Law  
1515 Market Street, 12th Floor  
Philadelphia, PA 19102-1981

DATE: 6-8-07

BY: Paul Colavecchi  
PAUL COLAVECCHI, ESQUIRE  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830  
814/765-1566

FILED NOV 12 2007  
JUN 11 2007  
6:34 PM  
M  
16-34-07

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,  
Defendant

CIVIL DIVISION

No. 05 - 847 - CD

RULE

Filed on Behalf of:

Defendant, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

FILED 30C  
01/11/2007 Atty  
JUN 08 2007 P. Colavecchi;  
GK

William A. Shaw  
Prothonotary/Clerk of Courts  
GK

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

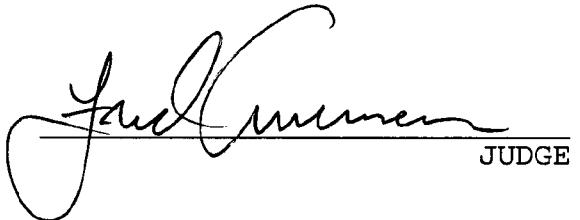
SARMUKH SINGH, :  
Plaintiff :  
: vs. : No. 05 - 847 - CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :  
Defendant :

R U L E

AND NOW, this 8 day of June, 2007,  
upon consideration of foregoing Objection to Notice of Oral  
Deposition and Motion for Counsel Fees and Expenses, it is the  
ORDER of this Court that a Rule be issued on the office of Zarwin,  
Baum, DeVito, Kaplan, Schaer & Toddy, P.C. to show cause why the  
oral deposition of Plaintiff, Sarmukh Singh, should not be held in  
Clearfield County, Pennsylvania; or in the alternative, award Paul  
Colavecchi, Esquire, Attorney for Plaintiff, Sarmukh Singh,  
attorney's fees and expenses in the amount of One Thousand Four  
Hundred Twenty-five (\$1,425) Dollars.

RULE RETURNABLE the 11<sup>th</sup> day of June, 2007,  
at 9:00 o'clock A.M., in Courtroom Number  
1.

BY THE COURT:

  
JUDGE

**FILED**

**JUN 08 2007**

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

DATE: 6/8/07

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

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendant

CIVIL DIVISION

No. 05 - 847 - CD

OBJECTION TO NOTICE OF ORAL  
DEPOSITION AND MOTION FOR  
ATTORNEY'S FEES AND EXPENSES

Filed on Behalf of:

Defendant, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

FILED 3cc  
07/18/07 Atty  
JUN 07 2007 P. Colavecchi  
GR

William A. Shaw  
Prothonotary/Clerk of Courts

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

SARMUKH SINGH, :  
Plaintiff :  
:   
vs. : No. 05 - 847 - CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :  
Defendant :

OBJECTION TO NOTICE OF ORAL DEPOSITION  
AND MOTION FOR ATTORNEY'S FEES AND EXPENSES

Sarmukh Singh, Plaintiff in the above-captioned action, files his objection to the Notice of Oral Deposition, and through his Attorney, Paul Colavecchi, Esquire, respectfully avers as follows:

1. The case at issue arose from an accident involving Sarmukh Singh, Plaintiff, and Anthony J. Blanchard and Jenkins Transport, Inc., Defendants, that occurred in Clearfield County, Pennsylvania on August 3, 2003.

2. A Complaint was filed with the Court of Common Pleas of Clearfield County, Pennsylvania on or about June 13, 2005.

3. Plaintiff received a Notice of Oral Deposition on or about May 25, 2007 for Plaintiff to appear at the law offices of Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy, P.C. at 1515 Market Street, Suite 1200, Philadelphia, Pennsylvania, on June 12, 2007. A copy of said Notice of Oral Deposition being attached hereto marked Exhibit "A".

4. Plaintiff files this objection to said Notice of Oral Deposition setting forth that the place of the deposition in the above-captioned case should be held in Clearfield County, being the County in which the accident occurred.

4. It is common practice in litigation cases that depositions be taken in the County of origin. Said County in this case is Clearfield County, Pennsylvania.

5. PA R.C.P. Rule 402(a) sets forth that, "The parties may by agreement (1) provide that depositions may be taken before any person, at any time or place, upon any notice and in any manner ...." The parties had no communication about the day, time and place prior to the scheduling of the oral deposition of Plaintiff, Sarmukh Singh.

6. PA R.C.P. Rule 4008 sets forth that if a deposition is to be taken by oral examination more than one hundred (100) miles from the courthouse, the court may upon motion, require the payment of reasonable expenses, including attorney's fees as the court shall deem proper.

7. The distance to the place of deposition, being 1515 Market Street, Philadelphia, Pennsylvania, from the Clearfield County Courthouse, 230 East Market Street, Clearfield, Pennsylvania is

approximately two hundred fifty-five (255) miles. Said distance far exceeds the one hundred (100) miles as contemplated in the aforementioned rule. Therefore, Plaintiff is seeking an award of attorney's fees and expenses for Counsel to attend a deposition in Philadelphia, Pennsylvania, in the amount of One Thousand Four Hundred Twenty-five (\$1,425) Dollars.

WHEREFORE, Sarmukh Singh, through his Attorney, Paul Colavecchi, Esquire, asks your Honorable Court to enter an Order directing the oral deposition of Sarmukh Singh to be taken in Clearfield County, Pennsylvania; or in the alternative, award Counsel Fees and Expenses to Paul Colavecchi, Esquire, Attorney for Plaintiff.

Respectfully submitted:



PAUL COLAVECCHI, ESQUIRE  
Attorney for Sarmukh Singh

ZARWIN, BAUM, DEVITO, KAPLAN, SCHAER & TODDY, P.C.

BY: Joseph W. Denneler, Esquire  
Charity A. Heidenthal, Esquire  
Identification Number: 83088/93604  
1515 Market Street, Suite 1200  
Philadelphia, PA 19102  
(215) 569-2800

Attorneys for Defendants,  
Anthony J. Blanchard and  
Jenkins Transport, Inc.

SARMUKH SINGH,

Plaintiff

v.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.  
Defendants

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
CIVIL DIVISION

NO. 05-847-CD

**NOTICE OF ORAL DEPOSITION**

TO: Paul Colavecchi, Esquire  
COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

PLEASE TAKE NOTICE that pursuant to Pennsylvania Rule of Civil Procedure 4007.1, the deposition upon oral examination of Plaintiff, Samukh Singh, will be taken by the undersigned counsel, on June 27, 2007 beginning at 10:30 a.m. at the law offices of Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy, P.C., 1515 Market Street, Suite 1200, Philadelphia, Pennsylvania, before a person duly authorized by law to administer oaths.

Said deposition shall continue from day to day until completion.

You are invited to attend and participate.

**ZARWIN, BAUM, DeVITO, KAPLAN,  
SCHAER & TODDY, P.C.**

BY:

  
CHARITY A. HEIDENTHAL, ESQUIRE  
JOSEPH W. DENNELER, ESQUIRE  
ATTORNEYS FOR DEFENDANTS

Date: May 23, 2007

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

SARMUKH SINGH

-VS-

No. 05-847-CD

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.

O R D E R

AND NOW, this 11th day of June, 2007, this being  
the date set for argument on the Objection to Notice of  
Oral Deposition filed on behalf of the Plaintiff;  
Plaintiff's counsel being present and no one appearing on  
behalf of the Defendants, it is the ORDER of this Court  
that the deposition scheduled for June 27, 2007, take place  
in Clearfield, Clearfield County, Pennsylvania, and not  
Philadelphia.

BY THE COURT,



President Judge

FILED  
07/12/2007  
JUN 12 2007  
2CC Atty's:  
P. Colavecchi  
McPherson  
William A. Shaw  
Prothonotary/Clerk of Courts  
GK

FILED

JUN 12 2007

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 6/12/07

You are responsible for serving all appropriate parties.

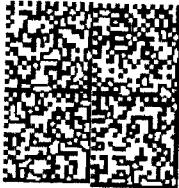
The Prothonotary's office has provided service to the following parties:

Plaintiff(s)  Plaintiff(s) Attorney  Other  
 Defendant(s)  Defendant(s) Attorney  
 Special Instructions:

WILLIAM A. SHAW  
PROTHONOTARY  
and CLERK of COURTS  
P.O. BOX 549  
CLEARFIELD, PENNSYLVANIA 16830

FILED  
m/16:30 am JUN 27 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

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Thomas J. McPherson  
1515 Market Street  
Philadelphia, PA 19102

Prothonotary/Clerk of Courts  
William A. Shaw

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JUN 27 2002

FILED  
m/16:30 cm

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

SARMUKH SINGH :  
-VS- : No. 05-847-CD  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :

O R D E R

AND NOW, this 11th day of June, 2007, this being the date set for argument on the Objection to Notice of Oral Deposition filed on behalf of the Plaintiff; Plaintiff's counsel being present and no one appearing on behalf of the Defendants, it is the ORDER of this Court that the deposition scheduled for June 27, 2007, take place in Clearfield, Clearfield County, Pennsylvania, and not Philadelphia.

BY THE COURT,

/S/ Fredric J Ammerman

---

**President Judge**

I hereby certify this to be a true and attested copy of the original statement filed in this case.

JUN 12 2007

Attest.

*William L. Ammerman*  
Prothonotary/  
Clerk of Courts

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

SARMUKH SINGH :  
: :  
-VS- : No. 05-847-CD  
: :  
ANTHONY J. BLANCHARD and :  
JENKINS TRANSPORT, INC. :  
:

O R D E R

AND NOW, this 11th day of June, 2007, this being  
the date set for argument on the Objection to Notice of  
Oral Deposition filed on behalf of the Plaintiff;  
Plaintiff's counsel being present and no one appearing on  
behalf of the Defendants, it is the ORDER of this Court  
that the deposition scheduled for June 27, 2007, take place  
in Clearfield, Clearfield County, Pennsylvania, and not  
Philadelphia.

BY THE COURT,

/S/ Fredric J Ammerman

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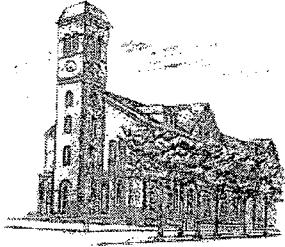
President Judge

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

JUN 12 2007

Attest.

*William E. Ammerman*  
Prothonotary/  
Clerk of Courts



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

---

**William A. Shaw**  
Prothonotary/Clerk of Courts      **Jacki Kendrick**  
Deputy Prothonotary/Clerk of Courts      **Bonnie Hudson**  
Administrative Assistant      **David S. Ammerman**  
Solicitor

PO Box 549, Clearfield, PA 16830 ■ Phone: (814) 765-2641 Ext. 1330 ■ Fax: (814) 765-7659 ■ [www.clearfieldco.org](http://www.clearfieldco.org)

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: 6/12/07

       You are responsible for serving all appropriate parties.

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

       Plaintiff(s)  X   Plaintiff(s) Attorney        Other

       Defendant(s)  X   Defendant(s) Attorney

       Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SARMUKH SINGH,

Plaintiff

Vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendants

CIVIL DIVISION

No. 05 - 847 - CD

**PRAECIPE TO DISCONTINUE AND  
SATISFY JUDGMENT**

Filed on Behalf of:

Plaintiff, SARMUKH SINGH

Counsel of Record for This  
Party:

PAUL COLAVECCHI, ESQUIRE  
Pa. I.D. #83274

COLAVECCHI & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
& COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

08/17/00  
**FILED** Colavecchi  
08/10/00  
AUG 30 2007  
Cert of disc &  
set issued to  
William A. Shaw  
Prothonotary/Clerk of Courts  
ATT Colavecchi

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

SARMUKH SINGH,

Plaintiff : NO. 05 - 847 - CD

vs.

ANTHONY J. BLANCHARD and  
JENKINS TRANSPORT, INC.,

Defendant :

**PRAECIPE TO DISCONTINUE  
and SATISFY JUDGMENT**

TO: PROTHONOTARY OF CLEARFIELD COUNTY

Please mark the record in the above-captioned action settled,  
discontinued, and ended AND show the judgment as satisfied.

  
PAUL COLAVECCHI, ESQUIRE  
Attorney for Plaintiff

August 27, 2007

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

*COPY*

Sarmukh Singh

Vs.  
**Anthony J. Blanchard**  
**Jenkins Transport, Inc.**

No. 2005-00847-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 August 30, 2007, marked:

Settled, discontinued and ended

Record costs in the sum of \$112.00 have been paid in full by Paul Colavecchi Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 30th day of August A.D. 2007.



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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

**COPY**

CIVIL DIVISION

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

No.: 2005-00847-CD

Sarmukh Singh

Debt: \$

Vs.

Atty's Comm.:

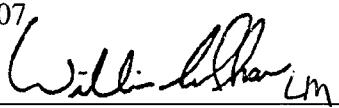
Anthony J. Blanchard  
Jenkins Transport, Inc.

Interest From:

Cost: \$7.00

NOW, Thursday, August 30, 2007 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 30th day of August, A.D. 2007

  
\_\_\_\_\_  
Prothonotary