

05-969-CD
Priority Comm. Vs. WRK Technologies

Priority Comm. Inc v WRK Tech. Inc
2005-969-CD

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PRIORITY COMMUNICATIONS, INC
(Plaintiff)

CIVIL ACTION

51 WEST LONG AVE
(Street Address)

No. 05-969-CD

DU BOIS, PA 15801
(City, State ZIP)

Type of Case: _____

Type of Pleading: _____

VS.

WRK TECHNOLOGIES, INC
(Defendant)

Filed on Behalf of:

(Plaintiff/Defendant)

112 McCACKEN RUN ROAD
(Street Address)

DU BOIS, PA 15801
(City, State ZIP)

WILLIAM R. KALTWASSER, JR
(Filed by)
WRK TECHNOLOGIES, INC

112 McCACKEN RUN RD
(Address)

814-375-9130
(Phone)

Wm R. Kaltwasser
(Signature)

FILED Def pd.
014008718 85.00
JUL 05 2005 Copy to Def.
William A. Shaw Copy mailed to:
Prothonotary/Clerk of Courts PLF
DJ Ford

46th

NOTICE OF APPEAL

FROM

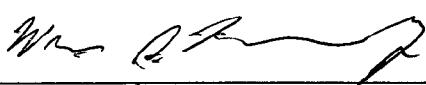
DISTRICT JUSTICE JUDGMENT

COMMON PLEAS NO.

05-969-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT <u>WPK TECHNOLOGIES, INC</u>	MAG. DIST. NO. OR NAME OF D.J. <u>46-3-01</u>
ADDRESS OF APPELLANT <u>112 MC CRACKEN RUN ROAD</u>	CITY <u>DU BOIS</u>
DATE OF JUDGMENT <u>6-2-2005</u>	IN THE CASE OF (Plaintiff) <u>PRIORITY COMMUNICATIONS, INC</u>
CLAIM NO. <u>CV LT</u>	vs <u>WPK TECHNOLOGIES, INC</u> (Defendant)
SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT 	
<p>This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.</p> <p>This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.</p> <p>_____ Signature of Prothonotary or Deputy</p>	
<p>If appellant was CLAIMANT (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.</p>	

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon PRIORITY COMMUNICATIONS, INC, appellee(s), to file a complaint in this appeal
(Name of appellee(s))

(Common Pleas No. 05-969-CD) within twenty (20) days after service of rule or suffer entry of judgment of non pros.



Signature of appellant or his attorney or agent

RULE: To PRIORITY COMMUNICATIONS, INC, appellee(s).
(Name of appellee(s))

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: 7/15/05, _____.



Signature of Prothonotary or Deputy

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____; ss

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the District Justice designated therein on
(date of service) _____, by personal service by (certified) (registered) mail, sender's
receipt attached hereto, and upon the appellee, (name) _____, on

 by personal service by (certified) (registered) mail, sender's receipt attached hereto.
 and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to whom
the Rule was addressed on _____, _____, by personal service by (certified) (registered)
mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS _____ DAY OF _____,

Signature of affiant

Signature of official before whom affidavit was made

Title of official

My commission expires on _____,

46th

NOTICE OF APPEAL

FROM

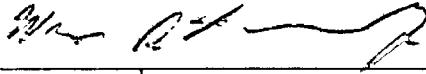
DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No.

05-969-CJ

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT		MAG. DIST. NO. OR NAME OF D.J.		
WIRK TECHNOLOGIES, INC		41-3-01		
ADDRESS OF APPELLANT		CITY	STATE	ZIP CODE
112 NC (CRACKED) RUN ROAD		DU BOIS	PA	15401
DATE OF JUDGMENT		(IN THE CASE OF Plaintiff) (Defendant)		
6-7-2005		PRIMRITY COMMUNICATIONS, INC vs WIRK TECHNOLOGIES, INC		
CLAIM NO.		SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT		
CV	CV-0000161-05			
LT				
<p>This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.</p> <p>This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.</p>				
Signature of Prothonotary or Deputy				
If appellant was CLAIMANT (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.				

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon PRIMRITY COMMUNICATIONS, INC, appellee(s), to file a complaint in this appeal
 Name of appellee(s)

(Common Pleas No. 05-969-CJ) within twenty (20) days after service of rule or suffer entry of judgment of non pros.



Signature of appellant or his attorney or agent

RULE: To PRIMRITY COMMUNICATIONS, INC, appellee(s).
 Name of appellee(s)

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: 7/5/05



Signature of Prothonotary or Deputy

u/s

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____; SS

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the District Justice designated therein on
(date of service) _____, by personal service by (certified) (registered) mail, sender's receipt attached hereto, and upon the appellee, (name) _____, on _____
 by personal service by (certified) (registered) mail, sender's receipt attached hereto.
 and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to whom
the Rule was addressed on _____, by personal service by (certified) (registered)
mail, sender's receipt attached hereto.

SIGNED (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS _____ DAY OF _____

Signature of affiant

Signature of official before whom affidavit was made

Title of official

Commission expires on _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-01

MDJ Name: Hon.

PATRICK N. FORD
Address: **309 MAPLE AVENUE**
PO BOX 452
DUBOIS, PA

Telephone: **(814) 371-5321** **15801**

WRK TECHNOLOGIE'S, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

PRIORITY COMMUNICATIONS, INC.
51 WEST LONG AVE
DUBOIS, PA 15801

NAME and ADDRESS

DEFENDANT:

WRK TECHNOLOGIE'S, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

NAME and ADDRESS

Docket No.: **CV-0000161-05**
Date Filed: **4/12/05**



THIS IS TO NOTIFY YOU THAT:

Judgment:

FOR PLAINTIFF

Judgment was entered for: (Name) **PRIORITY COMMUNICATIONS, INC.**

Judgment was entered against: (Name) **WRK TECHNOLOGIE'S, INC.**

in the amount of \$ **3,189.48** on: (Date of Judgment) **6/02/05**

Defendants are jointly and severally liable. (Date & Time) _____

Damages will be assessed on: _____

Amount of Judgment	\$ 2,926.87
Judgment Costs	\$ 87.00
Interest on Judgment	\$ 175.61
Attorney Fees	\$.00
Total	\$ 3,189.48

This case dismissed without prejudice. _____

Amount of Judgment Subject to
Attachment/42 Pa.C.S. § 8127 \$ _____

Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total \$ _____	

Portion of Judgment for physical
damages arising out of residential
lease \$ _____

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE
OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU
MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE
JUDGEMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST
COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE
A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL,
SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

6-2-05 Date Patrick N. Ford/PNF, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date _____, Magisterial District Judge

My commission expires first Monday of January, **2006**.

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-01

MDJ Name: Hon.

PATRICK N. FORD
309 MAPLE AVENUE
PO BOX 452
DUBOIS, PA

Telephone: **(814) 371-5321** **15801**

PATRICK N. FORD
309 MAPLE AVENUE
PO BOX 452
DUBOIS, PA 15801

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

PRIORITY COMMUNICATIONS, INC.
51 WEST LONG AVE
DUBOIS, PA 15801

NAME and ADDRESS

DEFENDANT:

WRK TECHNOLOGIE'S, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

NAME and ADDRESS

Docket No.: **CV-0000161-05**
Date Filed: **4/12/05**



05-969-CD

THIS IS TO NOTIFY YOU THAT:

Judgment:

FOR PLAINTIFF

Judgment was entered for: (Name) **PRIORITY COMMUNICATIONS, INC.**

Judgment was entered against: (Name) **WRK TECHNOLOGIE'S, INC.**

in the amount of \$ **3,189.48** on: (Date of Judgment) **6/02/05**

Defendants are jointly and severally liable.

(Date & Time) _____

Damages will be assessed on:

This case dismissed without prejudice.

FILED
*no 9-2031
JUL 11 2005*

Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ _____

William A. Shaw

Portion of Judgment for physical damages arising out of residential lease \$ _____

Prothonotary/Clerk of Courts

Amount of Judgment	\$ 2,926.87
Judgment Costs	\$ 87.00
Interest on Judgment	\$ 175.61
Attorney Fees	\$.00
Total	\$ 3,189.48
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total \$ _____	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGEMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

6-2-05 Date *Patrick N. Ford - PNF*, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date _____, Magisterial District Judge

My commission expires first Monday of January, **2006**.

SEAL

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. : No. 05-969 C.D.
WRK TECHNOLOGIES INC., : Type of Pleading: Complaint
Defendant :
: Filed on behalf of: Priority
: Communications, Inc., Plaintiff
: Counsel of Record for this party:
: HOPKINS HELTZEL LLP
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: 900 Beaver Drive
: DuBois, Pennsylvania 15801
: (814) 375-0300

FILED

JUL 27 2005
07 8:30 AM (60)
William A. Shaw
Prothonotary/Clerk of Courts
1 CEMA to ATT

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. : No. 05-969-C.D.
WRK TECHNOLOGIES INC., :
Defendant :

COMPLAINT

NOW, comes the Plaintiff, Priority Communications, Inc., by and through its attorneys, Hopkins Heltzel LLP, and files the within Complaint and states as follows:

COUNT I

1. Plaintiff, Priority Communications, Inc., is a Pennsylvania corporation with a principal business address of 12-14 West Long Avenue, DuBois, Pennsylvania.
2. Defendant WRK Technologies Inc., is a Pennsylvania corporation with a principal business address of 112 McCracken Run Road, DuBois, Pennsylvania.
3. In or about February 2, 2004, Defendant entered into a one (1) year annual advertising contract with Plaintiff.
4. Plaintiff produced and broadcasted radio advertisements for Defendant.
5. Defendant owes Plaintiff \$3,424.92 for advertising Plaintiff provided to Defendant and for interest as provided on Plaintiff's invoice.
6. Plaintiff has made demands upon Defendant which Defendant has refused to pay constituting a breach of the agreement between Plaintiff and Defendant.

7. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.92 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

COUNT II - QUANTUM MERUIT

8. Plaintiff repeats and incorporates the allegations of Count I as if set forth at length herein.

9. Plaintiff provided radio advertising for Defendant business at the request and for the benefit of Defendant.

10. Defendant has received the benefits of Plaintiff's work, the fair market value of which is \$3,424.92.

11. Defendant has failed to pay Plaintiff. Plaintiff is entitled to recovery together with accrued interest under the theory of quantum meruit.

12. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.92 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

COUNT III - UNJUST ENRICHMENT

13. Plaintiff repeats and incorporates the allegations of Count I and Count II as if set forth at length herein.

14. Defendant has received the benefits of Plaintiff's work and has not paid Plaintiff.

15. The actions of Defendant have caused Defendant to be unjustly enriched at the expense of Plaintiff. Said unjust enrichment is \$3,424.92 in radio advertising.

16. Plaintiff is entitled to recover under the theory of unjust enrichment.

17. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.29 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

Respectfully submitted,



David J. Hopkins, Esquire

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.
:
WRK TECHNOLOGIES INC., :
Defendant :
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Complaint filed on behalf of Plaintiff, Priority Communications, Inc., was forwarded on the 27th day of July, 2005 by U.S. Mail, first class, postage prepaid, to:

WKR Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801



David J. Hopkins, Esquire
Attorney for Plaintiff
Supreme Court No. 42519

07/26/2005 TUE 15:30 FAX 18143755035 Hopkins Law Firm

007/008

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.

Priority Communications, Inc.

By: Decanne, M. Stanton
Decanne StantonDate 7/26/05

CA

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :

vs. : No. 05 - 969 C. D.

WRK TECHNOLOGIES, INC., :
Defendant. :

: Type of Pleading:
: Preliminary Objections to Plaintiff's
: Complaint

: Filed on Behalf of:
: Defendant

: Filed by: William R. Kaltwasser, Jr.
: Pro Se
: President and CEO
: WRK Technologies, Inc.

: William R. Kaltwasser, Jr.
: President and CEO
: WRK Technologies, Inc.
: 112 McCracken Run Road
: Du Bois, PA 15801
: (814) 375-9130

Date: September 26, 2005

FILED

SEP 26 2005
D 2:35 PM
William A. Shaw (6K)
Prothonotary/Clerk of Courts

1 CMA to DCC

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
vs. : No. 05 - 969 C. D.
WRK TECHNOLOGIES, INC., :
Defendant. :

DEFENDANT'S PRELIMINARY OBJECTIONS TO PLAINTIFF'S COMPLAINT

AND NOW, comes the Defendant, WRK Technologies, Inc., pro se, by and through it's CEO William R. Kaltwasser, Jr. and files the within Preliminary Objections to the Plaintiffs' Complaint.

I FAILURE TO CONFORM TO RULES OF COURT

1. On or about August 27, 2005 did through their attorney file a complaint against WRK Technologies, Inc.
2. Plaintiff's complaint is lacking proper captions as required by Pa. R.C.P. 1018, and local rule 205.2(b), specifically Plaintiff's complaint fails to denote the type of action, e.g. whether the instant action is an action in law or an action in equity, further Plaintiff's complaint cover sheet is not dated.
3. Plaintiff's complaint is lacking a 'notice to defend' as required by Pa. R.C.P. 1018.1 (a), (b) and (c) as well as Local Rule 1018.1.

4. Plaintiff's complaint fails to specify whether the amount claimed does or does not exceed the jurisdictional amount requiring arbitration referral by local rule as is required by Pa. R.C.P. 1021(c).

II INSUFFICIENT SPECIFICITY

5. Plaintiff fails to plead their cause of action with sufficient specificity as required by Pa. R.C.P 1019(a) and (f). To wit;

6. Plaintiff fails to state specific dates or a period in which advertising was provided to Defendant. Further no dates or other specifics are provided as to any period or periods in dispute, paid, unpaid etc.

7. Plaintiff failed to provide a date or dates when services were rendered, billed or paid, further plaintiff fails to document when such billing occurred, when payments were due, paid or not paid.

II LEGAL INSUFFICIENCY

8. Plaintiff references a one (1) year contract in paragraph 3 of their complaint yet the contact instrument is not provided as an exhibit (or in any form), nor are any details or terms of the alleged contract specified, nor is the form of the contract specified as required by Pa. R.C.P. 1019(h) and (i). Further Plaintiff alleges breach of the aforementioned contract in paragraph 6 of Plaintiff's complaint, yet without such contract document attached or details of the terms which were alleged to have been breached, nor the dates or conditions of such alleged breach.

9. Plaintiff alleges that the amount of \$3,424.92 is due from Defendant, but fails to aver specific amounts that constitute services rendered, interest or other charges etc. or to provide the invoices and amounts in question as is required by Pa. R.C.P. 1019(i).

10. As the aforementioned defects in Plaintiff's complaint COUNT I fail as legally insufficient, and COUNTS II and III expand on and reference COUNT I they therefore fail to be legally sufficient as well, however in the interest of brevity as well as completeness of these Preliminary Objections Defendant alleges the same issues as to specificity of the averments also apply to COUNT II and COUNT III as well, specifically paragraphs 9, 10, 11, 14, 15, and 16.

WHEREFORE, Defendant respectfully requests this Honorable Court to dismiss the Plaintiffs' Complaint or, in the alternative require the Plaintiffs' to amend their Complaint to cure the defects alleged herein.



William R. Kaltwasser, Jr., Pro Se
President and CEO
WRK Technologies, Inc.

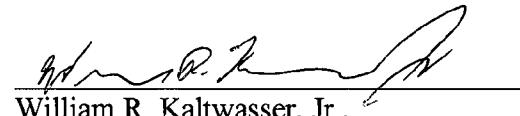
COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
: :
vs. : No. 05 - 969 C. D.
: :
WRK TECHNOLOGIES, INC., :
Defendant. :
:

CERTIFICATE OF SERVICE

I, William R. Kaltwasser, Jr. hereby swear or affirm that on the 26th day of SEPTEMBER,
2005, a true and correct copy of the within Defendant's Preliminary Objections was sent via
prepaid First Class Mail to the following:

Hopkins Heltzel LLP
Attn: David J. Hopkins, Esq.
Attorney for Plaintiff
900 Beaver Drive
Du Bois, PA 15801



William R. Kaltwasser, Jr.,
President & CEO
WRK Technologies, Inc.

CA

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
: :
vs. : No. 05 - 969 C. D.
: :
WRK TECHNOLOGIES, INC., :
Defendant. :
: :

FILED

SEP 26 2005

9/27/05
William A. Shaw
Prothonotary/Clerk of Courts
I chas to DPA

TO THE PROTHONOTARY/COURT ADMINISTRATOR:

Pursuant to Local Rule No. 1028(c)(1) and Local Rule 211 please direct the Court Administrator to establish a schedule for oral argument for consideration of Defendant's Preliminary Objections in the above captioned matter.



William R. Kaltwasser, Jr.,
President & CEO
WRK Technologies, Inc.
112 McCracken Run Road
Du Bois, PA 15801
(814) 375-9130

September 26, 2005

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

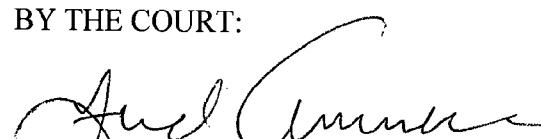
PRIORITY COMMUNICATIONS, INC.:

vs. : No. 05-969-CD
WRK TECHNOLOGIES, INC. :

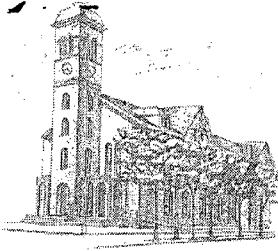
ORDER

AND NOW, this 3rd day of October, 2005, upon consideration of Defendant's Preliminary Objections to Plaintiff's Complaint filed in the above matter, it is the Order of the Court that argument has been scheduled for the 15th day of November, 2005, at 9:00 A.M, in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

BY THE COURT:


FREDRIC J. AMMERMAN
President Judge

FILED ^{ICC}
01/03/06 BY Hopkins
OCT 03 2005
L
William A. Shaw
Prothonotary/Clerk of Courts
^{ICC Def.}



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw

Prothonotary/Clerk of Courts

David S. Ammerman

Solicitor

Jacki Kendrick

Deputy Prothonotary

Bonnie Hudson

Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

Date: September 19, 2005

Over the past several weeks, 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

You are responsible for serving all appropriate parties.

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

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. : No. 05-969 C.D.
WRK TECHNOLOGIES INC., : Type of Pleading: Amended
Defendant : Complaint
: Filed on behalf of: Priority
: Communications, Inc., Plaintiff
: Counsel of Record for this party:
: HOPKINS HELTZEL LLP
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: 900 Beaver Drive
: DuBois, Pennsylvania 15801
: (814) 375-0300

Dated: November 15, 2005

FILED
NOV 15 2005
09:00 AM
William A. Shaw
Prothonotary/Clerk of Courts
2 copies to APL

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.
:
WRK TECHNOLOGIES INC., :
Defendant :
:

NOTICE

TO DEFENDANT:

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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

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

PRIORITY COMMUNICATIONS, INC.,	:	
Plaintiff	:	
	:	
vs.	:	No. 05-969-C.D.
	:	
WRK TECHNOLOGIES INC.,	:	
Defendant	:	

AMENDED COMPLAINT

NOW, comes the Plaintiff, Priority Communications, Inc., by and through its attorneys, Hopkins Heltzel LLP, and files the within Amended Complaint and states as follows:

COUNT I

1. Plaintiff, Priority Communications, Inc., is a Pennsylvania corporation with a principal business address of 12-14 West Long Avenue, DuBois, Pennsylvania.

2. Defendant WRK Technologies Inc., is a Pennsylvania corporation with a principal business address of 112 McCracken Run Road, DuBois, Pennsylvania.

3. In or about February 2, 2004, Defendant entered into a one (1) year annual advertising contract with Plaintiff. The Contract is attached hereto as Exhibit "A".

4. Plaintiff produced and then broadcasted radio advertisements for Defendant from February 2004 through August 2004.

5. Defendant owes Plaintiff \$3,424.92 for advertising Plaintiff provided for the benefit of Defendant for the period February 2004 through August 2004.

6. Plaintiff has made demand upon Defendant for payment which Defendant has refused to pay constituting a breach of the agreement between Plaintiff and Defendant.

7. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

8. The claim of Plaintiff is less than \$20,000.00 and requires arbitration pursuant to Clearfield County Local Rules.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.92 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

COUNT II - QUANTUM MERUIT

9. Plaintiff repeats and incorporates the allegations of Count I as if set forth at length herein.

10. Plaintiff provided radio advertising for Defendant business at the request and for the benefit of Defendant.

11. Defendant has received the benefits of Plaintiff's work, the fair market value of which is \$3,424.92.

12. Defendant has failed to pay Plaintiff. Plaintiff is entitled to recovery together with accrued interest under the theory of quantum meruit.

13. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.92 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

COUNT III - UNJUST ENRICHMENT

14. Plaintiff repeats and incorporates the allegations of Count I and Count II as if set forth at length herein.

15. Defendant has received the benefits of Plaintiff's work and has not paid Plaintiff.

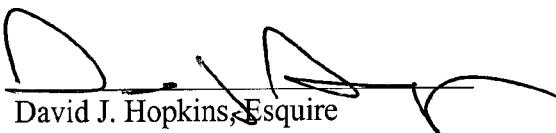
16. The actions of Defendant have caused Defendant to be unjustly enriched at the expense of Plaintiff. Said unjust enrichment is \$3,424.92 in radio advertising.

17. Plaintiff is entitled to recover under the theory of unjust enrichment.

18. Plaintiff has incurred District Magistrate fees of \$87.00 in procuring a judgment against Defendant before the District Magistrate.

WHEREFORE, Plaintiff demands judgment against Defendant for compensatory damages in the amount of \$3,511.29 together with pre-judgment interest, post-judgment interest, cost of suit and such other and further relief as the Court deems fair, just and equitable.

Respectfully submitted,



David J. Hopkins, Esquire

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.

Priority Communications, Inc.

By: Deeanne Stanton
Deeanne Stanton

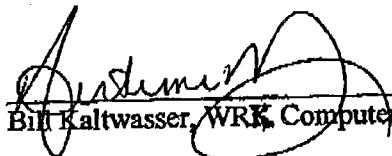
Date 11/15/05

PARTNERSHIP AGREEMENT

The following partnership is an agreement between Sunny 106, WCED and WRK Computer Systems. Sunny 106 and WCED agree to provide the following:

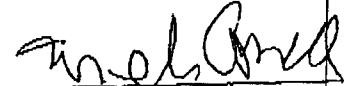
- Sunny 106 4 p.m. news 2/2/04-1/28/05
- 8 60s/day each Fri & Sat 6a-mid on News/Talk WCED 1/30/04-1/22/05
- Ask The Expert show once/week Feb '04-Jan '05

The partnership is based on an annual investment of \$12,567 to be billed in 12 monthly investments of \$434/month on Sunny 106 and \$613.25 on News/Talk WCED. Since the partnership is based on an annual discounted price, this agreement is non-cancelable by either party. However, it is mutually agreed that if it is in the best interest of both parties to terminate the agreement, it is agreed that Sunny 106 and News/Talk WCED are entitled to short rates.



Bill Kaltwasser, WRK Computer Systems

Date 2-4-04



Mel Correll, Sunny 106/WCED

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
: :
vs. : No. 05-969 C.D.
: :
WRK TECHNOLOGIES INC., :
Defendant :
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Amended Complaint filed on behalf of Plaintiff, Priority Communications, Inc., was forwarded on the 15th day of November, 2005 by U.S. Mail, first class, postage prepaid, to:

WRK Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801



David J. Hopkins, Esquire
Attorney for Plaintiff
Supreme Court No. 42519

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
: :
vs. : No. 05-969 C.D.
: :
WRK TECHNOLOGIES INC., : Type of Pleading: Important
Defendant : Notice
: :
: Filed on behalf of: Priority
: Communications, Inc., Plaintiff
: :
: Counsel of Record for this party:
: :
: HOPKINS HELTZEL LLP
: :
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: :
: 900 Beaver Drive
: DuBois, Pennsylvania 15801
: :
: (814) 375-0300

Dated: Dec 22 2005

FILED NO
013:1304@
DEC 22 2005

William A. Shaw
Prothonotary/Clerk of Courts

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
: :
vs. : No. 05-969 C.D.
: :
WRK TECHNOLOGIES INC., :
Defendant :
:

TO: WKR Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801

DATE OF NOTICE: December 22, 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 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Office of the Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, Pennsylvania 16830
(814) 765-2641


DAVID J. HOPKINS, ESQUIRE
Attorney for Plaintiff
Supreme Court No. 42519
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :

vs. : No. 05 - 969 C. D.

WRK TECHNOLOGIES, INC., :
Defendant. :

: Type of Pleading:
: Preliminary Objections to Plaintiff's
: Amended Complaint

: Filed on Behalf of:
: Defendant

: Filed by: William R. Kaltwasser, Jr.
: Pro Se
: President and CEO
: WRK Technologies, Inc.

: William R. Kaltwasser, Jr.
: President and CEO
: WRK Technologies, Inc.
: 112 McCracken Run Road
: Du Bois, PA 15801
: (814) 375-9130

Date: January 3, 2006

FILED 4cc
01/03/2006 JAN 03 2006 Def. (60)

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
: :
vs. : No. 05 - 969 C. D.
: :
WRK TECHNOLOGIES, INC., :
Defendant. :
: :

DEFENDANT'S PRELIMINARY OBJECTIONS TO PLAINTIFF'S COMPLAINT

AND NOW, comes the Defendant, WRK Technologies, Inc., pro se, by and through it's CEO William R. Kaltwasser, Jr. and files the within Preliminary Objections to the Plaintiffs' Amended Complaint.

I FAILURE TO CONFORM TO RULES OF COURT

1. On or about November 15, 2005 Plaintiff did through their attorney file an Amended Complaint against WRK Technologies, Inc.
2. Plaintiff fails to conform to state specifically whether the agreement between Plaintiff and Defendant was oral or written as is required by Pa. R.C.P 1019(h).

II INSUFFICIENT SPECIFICITY

3. Plaintiff fails to plead their cause of action with sufficient specificity as required by Pa. R.C.P 1019(a) and (f). To wit;

4. Plaintiff fails to state specific dates or a period in which advertising was provided to Defendant. Further no dates or other specifics are provided as to any period or periods in dispute, paid, unpaid etc.

5. Plaintiff failed to provide a date or dates when services were rendered, billed or paid, further plaintiff fails to document when such billing occurred, when payments were due, paid or not paid.

III LEGAL INSUFFICIENCY

6. Plaintiff alleges that the amount of \$3,424.92 is due from Defendant, but fails to aver specific amounts that constitute services rendered, interest or other charges etc. or to provide the invoices and/or statements of account and/or amounts in question as is required by Pa. R.C.P. 1019(i).

7. As the aforementioned defects in Plaintiff's Amended Complaint COUNT I fail as legally insufficient, and COUNTS II and III expand on and reference COUNT I they therefore fail to be legally sufficient as well, however in the interest of brevity as well as completeness of these Preliminary Objections Defendant alleges the same issues as to specificity of the averments also apply to COUNT II and COUNT III as well, specifically paragraphs 11, and 16 and the requests for relief for each count..

WHEREFORE, Defendant respectfully requests this Honorable Court to dismiss the Plaintiffs' Amended Complaint or, in the alternative require the Plaintiffs' to amend their Amended Complaint to cure the defects alleged herein.



William R. Kaltwasser, Jr., Pro Se
President and CEO
WRK Technologies, Inc.

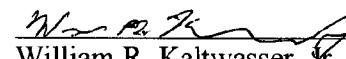
COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
: :
vs. : No. 05 - 969 C. D.
: :
WRK TECHNOLOGIES, INC., :
Defendant. :
:

CERTIFICATE OF SERVICE

I, William R. Kaltwasser, Jr. hereby swear or affirm that on the 3rd day of JANUARY,
2004, a true and correct copy of the within Defendant's Preliminary Objections was sent via
prepaid First Class Mail to the following:

Hopkins Heltzel LLP
Attn: David J. Hopkins, Esq.
Attorney for Plaintiff
900 Beaver Drive
Du Bois, PA 15801



William R. Kaltwasser, Jr.,
President & CEO
WRK Technologies, Inc.

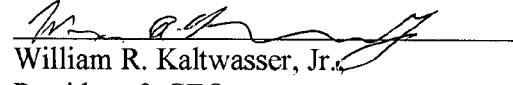
COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
: :
vs. : No. 05 - 969 C. D.
: :
WRK TECHNOLOGIES, INC., :
Defendant. : :

PRAECIPE

TO THE PROTHONOTARY/COURT ADMINISTRATOR:

Pursuant to Local Rule No. 1028(c)(1) and Local Rule 211 please direct the Court Administrator to establish a schedule for oral argument for consideration of Defendant's Preliminary Objections to Plaintiff's Amended Complaint in the above captioned matter.



William R. Kaltwasser, Jr.
President & CEO
WRK Technologies, Inc.
112 McCracken Run Road
Du Bois, PA 15801
(814) 375-9130

January 3, 2006

FILED *01/3:42 PM* *JAN 13 2006* *GR*
No CC
William A. Shaw
Prothonotary/Clerk of Courts

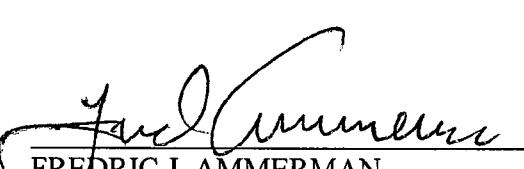
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION

PRIORITY COMMUNICATIONS, INC., :
: :
: :
vs. : No. 05-969-CD
: :
WRK TECHNOLOGIES, INC., :
: :

O R D E R

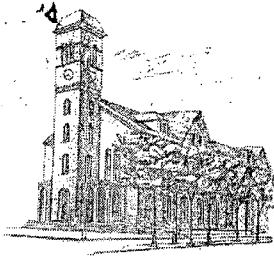
NOW, this 12 day of January, 2006, upon consideration of the Defendant, WRK Technologies, Inc., Preliminary Objections to Plaintiff's Amended Complaint, a Rule is hereby issued upon the Plaintiff to Appear and Show Cause why the Objections should not be granted. Argument is scheduled the 24th day of February, 2006, at 9:00 A.M. in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

BY THE COURT:


FREDRIC J. AMMERMAN
President Judge

FILED ^{2cc}
01/13/2006 Atty Hopkins
JAN 13 2006 ice Def.

William A. Shaw
Prothonotary/Clerk of Courts



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie Hudson
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

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

Sincerely,

William A. Shaw
Prothonotary

DATE: 11/3/06

You are responsible for serving all appropriate parties.

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

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

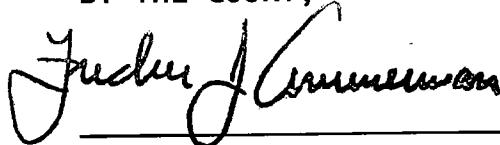
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PRIORITY COMMUNICATIONS, :
INC. :
-vs- : No. 05-969-CD
WRK TECHNOLOGIES, INC :
:

O R D E R

NOW, this 24th day of February, 2006, this being the date set for argument on the Defendant's Preliminary Objections to Plaintiff's Amended Complaint; the Court noting that the Defendant, William Kaltwasser, Jr, proceeding pro se, has failed to appear, it is the ORDER of this Court that said Preliminary Objections be and are hereby dismissed.

BY THE COURT,



President Judge

FILED
01/27/2006
FEB 27 2006

William A. Shaw
Prothonotary/Clerk of Courts

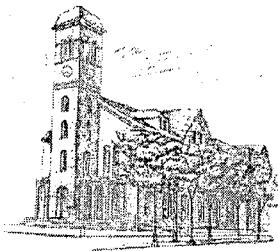
2 CENT TO ATTY Hopkins
2 CENT TO DEPT. (address on
reverse)

FILED

FEB 27 2006

WORK TECHNOLOGIES, INC. William A. Shaw
Prothonotary/Clerk of Courts

112 McCracken Run Road
DuBois, PA



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie Hudson
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

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Sincerely,

William A. Shaw
Prothonotary

DATE: 2/27/04

You are responsible for serving all appropriate parties.

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

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC.,
Plaintiff,

vs.

WRK TECHNOLOGIES, INC.,
Defendant.

WRK TECHNOLOGIES, INC.,
Counter-Plaintiff

vs.

PRIORITY COMMUNICATIONS, INC.,
Counter Defendant

: CIVIL ACTION – LAW

: No. 05 - 969 C. D.

: Type of Pleading:
: Answer, New Matter & Counter Complaint

: Filed on Behalf of:
: Defendant/Counter-Plaintiff

: Filed by: William R. Kaltwasser, Jr.
: Pro Se
: President and CEO
: WRK Technologies, Inc.

: William R. Kaltwasser, Jr.
: President and CEO
: WRK Technologies, Inc.
: 112 McCracken Run Road
: Du Bois, PA 15801
: (814) 375-9130

Date: March 20, 2006

FILED

MAR 21 2006

01301WM

William A. Shaw

Prothonotary/Clerk of Courts

4 CENS TO

WM KALTWASSER

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC.,	:	CIVIL ACTION – LAW
Plaintiff,	:	
	:	
vs.	:	No. 05 - 969 C. D.
	:	
WRK TECHNOLOGIES, INC.,	:	
Defendant.	:	

**ANSWER TO COMPLAINT
AND
COUNTERCLAIM**

AND NOW, comes the Defendant, W.R.K. Technologies, Inc., through it's president, pro se, and files the within Answer to the Plaintiff's Complaint and Counterclaim, and in support thereof avers as follows:

**ANSWERS TO COMPLAINT
ANSWERS TO COUNT I**

1. Admitted.
2. Averment Denied. To the contrary, the defendant is WRK Technologies, Inc. A Delaware Corporation having its principal offices located at 112 McCracken Run Road, Du Bois, and PA 15801.
3. Admitted.
4. Admitted in part and denied in part. It is admitted that Plaintiff did produce radio advertisements and that at least some of such advertisements were then broadcast by Plaintiff, but it is denied that Plaintiff broadcast all the advertisements it was contracted to air and strict proof thereof is demanded at trial.

5. Averment denied and strict proof thereof is demanded at trial.
6. Averment denied and strict proof thereof is demanded at trial.
7. Admitted.
8. No response required.

WHEREFORE Defendant requests judgment in Defendant's favor and against the Plaintiff in this matter.

ANSWERS TO COUNT II – QUANTUM MERUIT

9. No response required.
10. Admitted.
11. Averment denied and strict proof thereof is demanded at trial.
12. Averment denied and strict proof thereof is demanded at trial.
13. No response required.

WHEREFORE Defendant requests judgment in Defendant's favor and against the Plaintiff on this count.

ANSWERS TO COUNT III – UNJUST ENRICHMENT

14. No response required.
15. Averment denied and strict proof thereof is demanded at trial.
16. Averment denied and strict proof thereof is demanded at trial.
17. No response required.
18. No response required.

WHEREFORE Defendant requests judgment in Defendant's favor and against the Plaintiff in this matter.

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

WRK TECHNOLOGIES, INC., : CIVIL ACTION – LAW
Counter-Plaintiff, :
vs. : No. 05 - 969 C. D.
: :
PRIORITY COMMUNICATIONS, INC., :
Counter-Defendant. :
: Type of Pleading:
: New Matter & Counter Complaint
: :
: Filed on Behalf of:
: Defendant/Counter-Plaintiff
: :
: :
: Filed by: William R. Kaltwasser, Jr.
: Pro Se
: President and CEO
: WRK Technologies, Inc.
: :
: William R. Kaltwasser, Jr.
: President and CEO
: WRK Technologies, Inc.
: 112 McCracken Run Road
: Du Bois, PA 15801
: (814) 375-9130

Date: March 20, 2006

**COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW**

WRK TECHNOLOGIES, INC.,	:	CIVIL ACTION – LAW
Counter-Plaintiff,	:	
	:	
vs.	:	No. 05 - 969 C. D.
	:	
PRIORITY COMMUNICATIONS, INC.,	:	
Counter-Defendant.	:	

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

Court Administrator
Clearfield County Courthouse
Clearfield, PA 15830
814-765-2641

PA Lawyer Referral Service
PA Bar Association
P. O. Box 186
Harrisburg, PA 17108
800-692-7375

NEW MATTER

19. Plaintiff's claims contain scandalous and impertinent matter, specifically in regards to the amounts calculated to be due and for magistrate fees.

20. Plaintiff's claims are utterly bereft of support by the supplied exhibits nor the content of Plaintiff's complaint as they in no way provide any of the details of alleged work performed, specifics of transactions, payments made, billing provided, date of alleged breach of contract or any other form of evidentiary support for Plaintiff's claims.

WHEREFORE, Defendant requests that this Honorable Court enter judgment in Defendant's favor and against the Plaintiff in this new matter.

COUNTERCOMPLAINT

COUNT 1

21. The Counter-Plaintiff is Technologies, Inc., A Delaware Corporation, with it's principal offices located at 112 McCracken Run Road, Du Bois, Clearfield, Pennsylvania.

22. The Counter-Defendant is Priority Communications, Inc. a Pennsylvania corporation with a principal address of 12-14 West Long Avenue, Du Bois, Pennsylvania.

23. On or about February 2, 2004 Counter-Plaintiff entered one (1) year contract to with Counter-Defendant to obtain advertising according to terms of such contract a copy of which is attached to Counter-Defendant's/Plaintiff's Complaint as exhibit 'A'.

24. Counter-Defendant had, up until that point, always billed for advertising services according to industry practice of including itemized detail of services provided including specific

dates and times that the contracted advertisements were aired. An example of such billing is attached to this counter-complaint as Counter-Plaintiff's exhibit "A"

25. Counter-Defendant did not provide such billing or documentation, nor for that matter any billing or documentation, for portions of the contract referred to as 'News/Talk WCED' in the amount of \$613.25 per month for the first four (4) months of said contract, and to the date of this counter-complaint still has not provided such billing or documentation.

26. Counter-Plaintiff did enter into the February 2004 billing cycle with a \$60.00 credit according to Counter-Defendant's billing system, specifically invoice 402337, which also references our payment of \$600.00 dated and credited February 23, 2004. A copy of said invoice is attached hereto as the above referenced exhibit "A".

27. Counter-Plaintiff did upon several occasions throughout March, April, May and June, request such billing and documentation for the WCED advertising to which Counter-Defendant did reply that Counter-Defendant was encountering delays implementing Counter-Defendant's new billing system and that such billing and documentation would be provided as soon as possible.

28. On March 2, 2004 Counter Plaintiff did make another payment of \$447.25 via check number 1956 which is not noted on any of Counter-Defendant's bills or statements. A bank provided copy of such check is attached hereto as exhibit "B".

29. On March 18, 2004 Counter Plaintiff did make another payment of \$523.63 via check number 1956 which was credited on Counter-Defendant's invoice number 403235, dated March 28, 2004, for WDSN News and Weather. A copy of said statement is attached hereto as exhibit "C".

30. On or about May 1, 2004, after entering into the February 2004 billing period with a \$60.00 credit balance and making a number of payments in the amount of \$1,570.88, an amount in excess of the billing of a total of \$1,402.00 so far received from Counter-Defendant, Counter-Plaintiff reached a decision to make no further payments to Counter-Defendant until such time as billing, statements of service and documentation for such payments already made, nor would Counter-Plaintiff make any future payments without the requisite billing and statements of service being provided by Counter-Defendant as is consistent with the Uniform Commercial Code, specifically 13 Pa C.S. § 2610.

31. On or about June 25, 2004 Counter-Defendant did provide to Counter-Plaintiff a pair of statements dated June 22, 2004 and April 25, 2004 showing a balance of \$779.25, hand noted as NewsTalk 1420 WCED, but which only showed balance forward and included no detail of services rendered, dates nor any invoice dates or numbers, which were immediately paid, in good faith, by Counter-Plaintiff with Counter-Plaintiff's check number 1200. Said statements are attached hereto as exhibit "D", and a bank provided check copy is attached hereto as exhibit "E".

32. As of June 25, 2005 Counter-Plaintiff's payments and credits totaled \$2410.33 and the total billing provided by Counter-Defendant totaled only \$1836.00 so Counter-Plaintiff once again opted to hold any additional payment until such time as proper billing was provided.

33. On or about June 30, 2004 Counter-Plaintiff received a statement for WDSN, invoice number 406218 in the amount of \$434.00 in current charges plus \$665.44 in past due balance and finance charges and as Counter-Plaintiff's records still showed a credit balance relative to billing received at this point Counter-Plaintiff again did not pay this invoice, a copy of which is attached hereto as exhibit "F"

34. On or about July, 1 2004 Counter-Plaintiff received the first true statement and invoice for WCED in the amount of \$613.25, however this invoice clearly showed that Counter-Defendant ran only half of the contracted advertising yet the billing provided was for the full amount of the contract, a copy of said statement and invoice is attached hereto as exhibit "G".

35. On July 13, 2004 Counter-Plaintiff terminated the employment of their operations manager and replaced her with a new person resulting in delays in addressing Counter-Plaintiff's daily operations which caused a delay in continuing to address Counter-Defendant's billing issues and shortages referenced in the paragraphs above.

36. On or about July 30, 2004 Counter-Plaintiff received statements from Counter-Defendant for both WDSN and WCED showing total balances due of \$1,115.82 and \$613.25 respectively for a total of \$1,729.07 which was in error both due to invalid finance charges and amounts paid by Counter-Plaintiff for services prior to the date of these statements but Counter-Plaintiff did not have a reasonable period of time address these issues. Copies of said statements are hereto attached as exhibit "H" and "I" respectively.

37. On or about the late morning of August 2, 2004 Counter-Plaintiff did receive a phone call from Mel Correll, Counter-Plaintiff's salesperson from Counter-Defendant stating that Counter-Plaintiff was at least \$3,000.00 dollars past due and that if Counter-Plaintiff did not make immediate payment Counter-Plaintiff would be pulled off the air, as the only statements provided to this point by Counter-Defendant showed a lower total amount due than Counter-Defendant claimed were past due Counter-Defendant did state that Counter-Plaintiff was willing to attempt to straighten out the billing and make any payments due after a correct amount was determined. This offer was refused and Counter-Defendant reiterated that Counter-Plaintiff's advertising was to be pulled off effective immediately to which Counter-Plaintiff's replied that if

we were pulled off during one of Counter-Plaintiff's most critical months that Counter-Plaintiff would never advertise with Counter-Defendant's company again. Once again the answer was that immediate payment was required or advertising would be immediately terminated, to which Counter-Plaintiff reiterated the position that without correcting the billing errors no payment would be made, subsequent to this call Counter-Defendant pulled the advertising off the air.

38. On or about August 18, 2004 Counter-Plaintiff received new billing from Counter-Defendant with a cover page stating that Counter-Defendant's original July 2004 billing was in error and that the corrected billing was being provided. This billing again was in error as Counter-Defendant sent only the corrected billing for July 2004 for WDSN, no statement or billing for July 2004 for WCED was provided, instead Counter-Plaintiff received Winery at Wilcox's July WDSN billing. Copies of this billing and letter package are attached hereto as exhibit "J".

39. Continuing throughout 2004 and into 2005 Counter-Plaintiff attempted to rectify the billing issues with Counter-Defendant to no avail, Counter-Defendant's position was that Counter-Plaintiff must pay what Counter-Defendant claimed regardless of whether or not proper billing, statements of service or credits for missed advertisements, as was documented by several of the few statements of service provided, were ever provided.

40. Counter-Plaintiff did make in good faith payments for services expecting same to be delivered as per the contract terms.

41. Counter-Plaintiff made payments for such advertising in excess of the amounts billed by Counter-Defendant as Counter-Defendant failed to bill for portions of said contract for several months and Counter-Plaintiff had a good faith belief that the contracted advertising had not in fact been provided by Counter-Defendant.

WHEREFORE, Counter-Plaintiff requests that this Honorable Court enter judgment in favor of Counter-Plaintiff, and against Counter-Defendant, in the amount of Counter-Plaintiff's overpayments relative to services actually rendered and billed and such other and further relief as this Honorable Court would deem to be just and appropriate.

COUNT II – BREACH OF CONTRACT

42. Paragraphs 21 through 41 inclusive of the within Counter-Complaint are incorporated herein by reference as if set forth at length.

43. Counter-Defendant did breach contract by failure to meet advertisement run schedules as contracted throughout almost every month of the contract term.

44. Counter-Defendant did not in good faith attempt to rectify Counter-Defendant's billing issues and errors to the detriment of Counter-Plaintiff.

45. Counter-Defendant did further breach said contract on August 2, 2004 by pulling Counter-Plaintiff's advertising and unilaterally canceling a 'non-cancelable' contract without cause.

46. Counter-Defendant did economically damage Counter-Plaintiff by their unjust actions resulting in Counter-Plaintiff not receiving planned and contracted advertising coverage for one of Counter-Plaintiff's busiest periods of retail sales, specifically the back to school shopping period.

47. Counter-Plaintiff had insufficient time to obtain an equivalent amount of advertising and to develop a campaign with a different radio station before the end of the back to school period.

WHEREFORE, Counter-Plaintiff requests that this Honorable Court enter judgment in favor of Counter-Plaintiffs, and against Counter-Defendant, in the amount of Counter-Plaintiff's damages relative to loss of planned and contracted advertising and the resultant loss in sales and such other and further relief as this Honorable Court would deem to be just and appropriate.

COUNT III – UNFAIR AND DECEPTIVE TRADE PRACTICES

48. Paragraphs 21 through 47 inclusive of the within Counter-Complaint are incorporated herein by reference as if set forth at length.

49. Counter-Defendant did fail to provide contracted services as specified in the contract.

50. Counter-Defendant did fail to provide billing and statements of service for several months yet collected payment and billed for such unbilled and unsubstantiated months of advertising.

51. Counter-Defendant did fail to correct missing advertisements either in the form of credits or makeup advertisements for the clearly documented missing advertisements in months where statements of service were provided.

52. Counter-Defendant did claim via invoice number 3395-00002-0004 dated August 29, 2004, after clearly stating to Counter-Plaintiff that Counter-Plaintiff was pulled off the air, and unbeknown to, an unverified by, Counter-Plaintiff, that Counter-Defendant provided an additional advertisement on WDSN for nine (9) days and charged for such in the amount of \$180.00. A copy of said invoice is hereto attached as exhibit "K"

53. Counter-Plaintiff has attempted on many occasions to obtain such billing, corrections and documentation to no avail.

WHEREFORE, Counter-Plaintiff requests that this Honorable Court enter judgment in favor of Counter-Plaintiffs, and against Counter-Defendant, both in the amount of post cancellation advertising that was allegedly provided by Counter-Defendant contrary to it's statements that Counter-Plaintiff's advertising had been pulled and in the amount of Counter-Plaintiff's damages relative to loss of planned and contracted advertising and the resultant loss in sales and such other and further relief as this Honorable Court would deem to be just and appropriate.

COUNT IV – UNJUST ENRICHMENT

54. Paragraphs 21 through 52 inclusive of the within Counter-Complaint are incorporated herein by reference as if set forth at length.

55. Counter-Plaintiff in good faith allowed Counter-Defendant to continue to make purchases 'on account' while attempting to rectify the billing issues with Counter-Defendant.

56. On April 16, 2004 Counter-Defendant did make a purchases on account totaling \$42.29 documented on Counter-Plaintiff's invoice number D11657, a copy of which is attached hereto as exhibit "L".

57. On November 9, 2004 Counter-Defendant did make a purchase on account totaling \$31.75 documented on Counter-Plaintiff's invoice number D12124, a copy of which is attached hereto as exhibit "M".

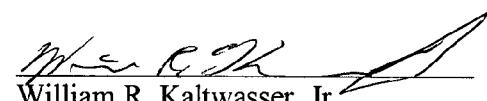
58. Counter-Defendant has not paid these invoices, nor has Counter-Defendant credited them to the amounts Counter-Defendant claims are due from Counter-Plaintiff.

59. The actions of Counter-Defendant have caused Counter-Defendant to be unjustly enriched at the expense of Counter-Plaintiff in the amount of \$74.04 in merchandise.

VERIFICATION

I, William R. Kaltwasser, Jr., as President and CEO of WRK Technologies, Inc., Defendant/Counter-Plaintiff herein, do hereby verify that the facts set forth in the foregoing answers to Complaint and Counter Claim are true and correct to the best of my knowledge, information and belief.

I understand that any false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.



William R. Kaltwasser, Jr.
President and CEO
WRK Technologies, Inc.
t/d/b/a WRK Computer Systems

FRANCIS M. KIRKWOOD, COMMONWEALTH OF PENNSYLVANIA,
51 WEST LONG AVENUE,
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of _____ } SS: _____
County of _____ }

By

Subscribed and Sworn to Before

Me this day of 20

WRK020 . WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Page 1

NOTARY PUBLIC

My Commission Expires

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE 4/27/04 **Invoice #** 402337

2/29/04
Invoice # 402337

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				60.00
2/23/04	PAYMENTS - CHECK # 1938				600.00
	CONTRACT 41154				
1/26/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/27/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/28/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/30/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
2/03/04	3pm NEWS/WX	WDSN FM 3:00p	60	1	20.00
<i>match w/ 1/24/04</i>					
	SUBTOTAL	100.00			
	CONTRACT 42146 / *4PM NEWS SPONSOR				
2/20/04	WDSN FM 4:00p		60	1	0.00
2/02/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/03/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/04/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/05/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/06/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/09/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/10/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/11/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/12/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/13/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/16/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/17/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/18/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT **30 DAYS** **60 DAYS** **90 AND OVER**

51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of

County of

By

Subscribed and Sworn to Before

Me this day of 20

WRK020 . WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Page 2

NOTARY PUBLIC

My Commission Expires

Advertiser: WRK TECHNOLOGIES, INC.

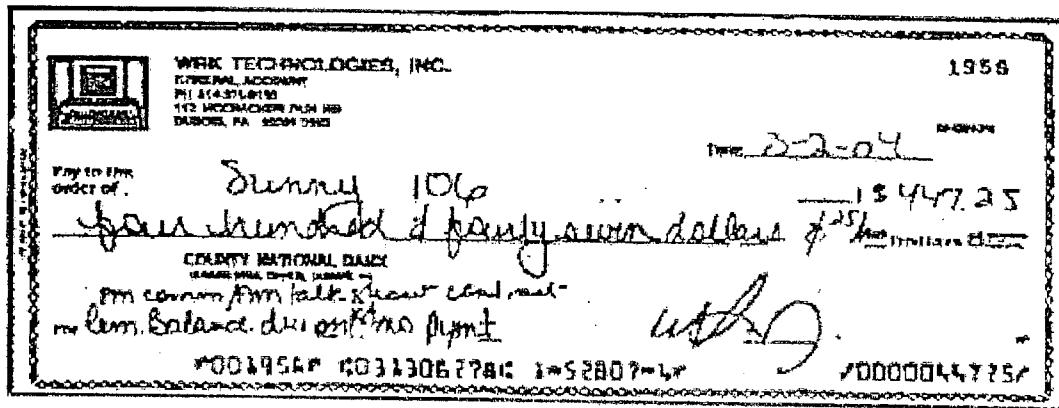
BILLING DATE 2/29/04
Invoice # 402337

THANK YOU FOR CHOOSING WDSN-FM, WQKY-FM AND
WLFM-AM

SalesRep : MEL CORRELL

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
126,00-	0.00	0.00	0.00



#1956 03/04/2004 \$447.25#

Exh B

FROM: PRIORITY COMMUNICATIONS, INC.
151 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of _____ }
County of _____ } ss:

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station in Accordance With the Accompanying Statement:

By 

Subscribed and Sworn to Before

Me this day of 20

WRK020 WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Page 1

NOTARY PUBLIC

My Commission Expires

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE 07/23/04
Invoice # 403235

5/28/04

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				✓ 126.00
3/19/04	PAYMENTS - CHECK # 1670				✓ 523.63
	CONTRACT 42146 / 4PM NEWS SPONSOR				
3/01/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/02/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/03/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/04/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/05/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/08/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/09/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/10/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/11/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/12/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/15/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/16/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/17/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/18/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/19/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/22/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/23/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/24/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/25/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/26/04	4PM NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/28/04	WDSN FM ADVERTISING PACKAGE				454.00
	SUBTOTAL	454.00			

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER

110001 PRIORITY COMMERCIAL FONDS, INC.
51 WEST LONG AVENUE
DEMOBIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of }
County of } SS:

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

WRK020 : WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Page 6

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE 3/28/04
Invoice # 403331

5/28/04
Invoice # 403235

My Commission Expires

DATE	ACCOUNT/RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
>>>>>>>>>>>>>	CONTINUATION FROM PREVIOUS PAGE >>>>>>>>>>>>>>				
	Total Sales ----- 434.00		20		

THANK YOU FOR CHOOSING WDRM-FM, WOKY-FM AND
WLEM-AM

SalesRep : MEL CORRELL

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
215.63-	0.00	0.00	0.00

Priority Communications, Inc.
51 West Long Avenue
DuBois, PA 15801

Statement

Date
6/22/2004

To:
WRK Computer Systems, Inc 112 McCracken Run Road DuBois, PA 15801
NewsTalk 1420 WGED

	Amount Due	Amount Enc.	
	\$779.25		
Date	Transaction	Amount	Balance
04/25/2004	Balance forward <i>✓ \$200 e Tech \$779.25 6-25-04</i>		779.25

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	0.00	0.00	613.25	166.00	\$779.25

Exh D

51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of

County of

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station _____ in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

WRK020 WRK TECHNOLOGIES, INC.
112 INCORACKEN RUN ROAD
POB015, PA 15621

..... **NOTARY PUBLIC**

My Commission Expires

ANSWER: **NO** THE BOUNDARY IS NOT A LINE

BILLING DATE 10/01/2014

卷之三

DATE	ACCOUNT/RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT.				1,534.60
	CONTRACT 10540 / ADVERTISING REQUEST				
6/31/04	SAN NEWS	WBSN FM 6:00pm	60	1	0.00
7/1/04	1PM NEWS/TAX	WBSN FM 4:30pm	60	1	0.00
6/02/04	1PM NEWS/77	WBSN FM 5:30pm	60	1	0.00
6/03/04	1PM NEWS/77	WBSN FM 6:00pm	60	1	0.00
6/04/04	1PM NEWS/WX	WBSN FM 6:00pm	60	1	0.00
6/07/04	1PM NEWS/WX	WBSN FM 9:00pm	60	1	0.00
6/08/04	1PM NEWS/WX	WBSN FM 10:00p	60	1	0.00
6/09/04	1PM NEWS/WX	WBSN FM 11:00p	60	1	0.00
6/10/04	1PM NEWS/WX	WBSN FM 12:00a	60	1	0.00
6/11/04	1PM NEWS/WX	WBSN FM 1:00a	60	1	0.00
6/12/04	1PM NEWS/WX	WBSN FM 2:00a	60	1	0.00
6/13/04	1PM NEWS/WX	WBSN FM 3:00a	60	1	0.00
6/14/04	1PM NEWS/WX	WBSN FM 4:00a	60	1	0.00
6/15/04	1PM NEWS/WX	WBSN FM 5:00a	60	1	0.00
6/16/04	1PM NEWS/WX	WBSN FM 6:00a	60	1	0.00
6/17/04	1PM NEWS/WX	WBSN FM 6:30a	60	1	0.00
6/18/04	1PM NEWS/WX	WBSN FM 7:00a	60	1	0.00
6/21/04	1PM NEWS/WX	WBSN FM 4:00p	60	1	0.00
6/22/04	1PM NEWS/WX	WBSN FM 4:00p	60	1	0.00
6/23/04	1PM NEWS/WX	WBSN FM 4:00p	60	1	0.00
6/24/04	1PM NEWS/WX	WBSN FM 4:00p	60	1	0.00
6/25/04	1PM NEWS/WX	WBSN FM 4:00p	60	1	0.00
6/27/04	WBSN FM - ADVERTISING REQUEST				474.00
	SUBTOTAL				1,008.60

A Finance Charge is computed by a **PERIODIC RATE OF 1 1/2% PER MONTH**, which is an **ANNUAL PERCENTAGE RATE OF 18%**, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER

50 WEST 40TH AVENUE
00801 74 (560)

AFFIDAVIT OF SERVICE RENDERED

State of _____ } SS: _____
County of _____ }

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

JKK020 JK TECHNOLOGIES, INC.
112 MOORAKIKA RD, SUITE 100
DOUGLAS, PA 15601

.. NOTARY PUBLIC

My Commission Expires

Advertiser: 328-7477 601-3870

BILLING DATE

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
443,75	1,14	1,14	0,00

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

06/27/04

DuBois, PA 15801
(814) 375-5260

Charges or Payments received after this date will appear on next
Terms:

A/R Cash-WCED-AM

WRK COMPUTER
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date				Amount
6/27/2004	3397-00003-0002	* Invoice		613.25

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jun	May	Apr	Mar +	Please Pay This Amount
613.25	0.00	0.00	0.00	613.25

Exh G,1

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

WRK COMPUTER

Amount Paid \$		
3397-00003-0002	6/27/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

WRK COMPUTER
 112 MCCRACKEN RUN ROAD
 DUBOIS, PA 15801

3397-00003-0002 O 6/27/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description:

Salesperson: Correll, Mel

Date	Day	Length	Comments	Qty	Rate	Total
6/27/2004	Sun		News-Talk 1		613.25	613.25
6/18/2004	Fri	1:00	Advertising News-Talk 1 7:22:30 AM 9:05:30 AM 12:04:30 PM 1:44:00 PM 4:29:00 PM 5:40:00 PM 6:46:00 PM 10:58:00 PM	8	0.00	0.00
6/19/2004	Sat	1:00	Advertising News-Talk 1 7:22:00 AM 8:22:00 AM 8:56:00 AM 10:23:00 AM 11:23:00 AM 12:19:00 PM 2:58:00 PM 4:58:30 PM	8	0.00	0.00
6/25/2004	Fri	1:00	News-Talk 1 6:04:30 AM 7:11:10 AM 8:22:10 AM 9:19:00 AM 12:58:50 PM 2:18:00 PM 6:51:00 PM 11:59:00 PM	8	0.00	0.00
6/26/2004	Sat	1:00	News-Talk 1 6:04:00 AM 7:04:00 AM 8:56:00 AM 10:59:00 AM 2:04:00 PM 2:58:00 PM 10:04:00 PM 10:58:00 PM	8	0.00	0.00
			Missing 4 days @ 85 pts each. 32 spots missing?			

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	32	Total	613.25
Total Due			613.25

INVOICE

Exh G2,

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash-WCED-AM

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date				Amount
6/27/2004	3395-00003-0000	Invoice		613.25 613.25
7/25/2004	F/C-7-2004	Current Finance Charge		9.20 9.20

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
9.20	613.25	0.00	0.00	622.45

Exh H

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash - WDSN-FM

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date			Amount
3/19/2004	516	1670	-215.63
4/25/2004	ADJ-303	Invoice April 2004 DARTS	434.00 218.37
5/30/2004	ADJ-512	Invoice May 2004 DARTS	434.00
5/30/2004	ADJ-513	Invoice May 2004 DARTS FC	3.28 434.00 3.28
6/27/2004	3395-00002-0002	Invoice: 4PM NEWS	434.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge	9.83 434.00 9.83
7/25/2004	F/C-7-2004	Current Finance Charge	16.34 16.34

*Putting F/C
on F/C + on 0/4
balance*

Please remit payment at once!

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
16.34	443.83	437.28	218.37	1,115.82

Exh I

Priority Communications, Inc
51 West Long Avenue
DuBois, PA 15801

August 16, 2004

Dear Valued Advertiser,

Please find enclosed an amended statement and invoice for your July advertising. We were experiencing computer software issues and all charges were not applied to the statement you may have received a week or so ago. Please accept my apologies and if you should have any questions or concerns please feel free to contact me.

Sincerely,

Deeanne M. Stanton

Deeanne M. Stanton
Billing Manager

Exh J, 1

Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
 Terms:

A/R Cash - WDSN-FM

WRK TECHNOLOGIES, INC.
 112 MCCRACKEN RUN ROAD
 DUBOIS, PA 15801

Date				Amount
3/19/2004	516	1670		-215.63
4/25/2004	ADJ-303	Invoice April 2004 DARTS		434.00 218.37
5/30/2004	ADJ-512	Invoice May 2004 DARTS		434.00 434.00
5/30/2004	ADJ-513	Invoice May 2004 DARTS FC		3.28 3.28
6/27/2004	3395-00002-0002	Invoice: 4PM NEWS		434.00 434.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge		9.83 9.83
7/25/2004	3395-00002-0003	Invoice: 4PM NEWS		434.00 434.00
7/25/2004	3395-00003-0001	Invoice		613.25 613.25

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
1,047.25	443.83	437.28	218.37	2,146.73

Exh J, 2

Please Remit To
Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue
DuBois, PA 15801
(814) 375-5260

WRK TECHNOLOGIES, INC.

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Amount Paid \$		
3395-00002-0003	7/25/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

3395-00002-0003 O 7/25/2004 1
Purchase Order Number:
Co-Op: <<None>>
Description: 4PM NEWS
Salesperson: Correll, Mel

Date	Day	Length	Comments	Qty	Rate	Total
7/25/2004	Sun		Sunny 106 W 4 PM News Sponsorship		434.00	434.00
Copy Name: 4905						
			Advertising			
6/28/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
6/29/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
6/30/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/1/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/2/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/5/2004	Mon	1:00	Sunny 106 W 7:01:30 AM	1	0.00	0.00
7/6/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/7/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/8/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/9/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/12/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/13/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/14/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/15/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/16/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/19/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/20/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/21/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/22/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/23/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	20	Total	434.00
Total Due			434.00

INVOICE

Exh J, 3

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash - WDSN-FM

WINERY AT WILCOX
MUFFERTS RUN ROAD
WILCOX, PA 15870

Date	Ref	Description	Amount
4/25/2004	ADJ-302	Invoice April 2004 DARTS	395.00
7/1/2004	101652-1	Payment, Thank You	-395.00
			0.00
5/30/2004	ADJ-510	Invoice May 2004 DARTS	510.00
5/30/2004	ADJ-511	Invoice May 2004 DARTS	5.93
			510.00
			5.93
6/27/2004	3354-00002-0002	Invoice: Partnership	395.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge	13.66
			395.00
			13.66
7/25/2004	3354-00002-0003	Invoice: Partnership	395.00
7/25/2004	3354-00005-0000	Invoice	771.56
			395.00
			771.56

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
1,166.56	408.66	515.93	0.00	2,091.15

ExhJ.4

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

WINERY AT WILCOX

Amount Paid \$		
3354-00005-0000	7/25/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

WINERY AT WILCOX
 MUFFERTS RUN ROAD
 WILCOX, PA 15870

3354-00005-0000 O 7/25/2004 1
 Purchase Order Number:
 Co-Op: <<None>>
 Description:
 Salesperson: Correll, Mel

Date	Day	Length	Comments	Qty	Rate	Total
7/25/2004	Sun		Sunny 106 W		771.56	771.56
			Copy Name: 6164			
7/10/2004	Sat	1:00	Advertising Sunny 106 W 6:34:00 AM 8:16:00 AM 9:35:30 AM 11:35:30 AM 1:33:00 PM 3:15:30 PM 7:19:30 PM 9:49:00 PM	8	0.00	0.00
7/11/2004	Sun	1:00	Sunny 106 W 6:18:30 AM 7:33:00 AM 9:16:30 AM 10:34:30 AM 11:33:00 AM 12:33:00 PM 9:22:30 PM 10:21:30 PM	8	0.00	0.00
7/17/2004	Sat	1:00	Sunny 106 W 7:46:00 AM 9:34:00 AM 11:47:00 AM 2:47:00 PM 3:47:00 PM 5:50:00 PM 7:49:00 PM 10:49:00 PM	8	0.00	0.00
7/18/2004	Sun	1:00	Sunny 106 W 7:17:00 AM 8:18:00 AM 11:16:00 AM 1:34:00 PM 4:49:00 PM 7:18:00 PM 8:49:00 PM 10:21:00 PM	8	0.00	0.00
7/24/2004	Sat	1:00	Sunny 106 W 7:47:00 AM 9:34:00 AM 12:15:00 PM 1:33:00 PM 2:34:00 PM 3:34:00 PM 9:00:00 PM 11:22:00 PM	8	0.00	0.00
7/25/2004	Sun	1:00	Sunny 106 W 6:00:00 AM 7:48:00 AM 8:48:00 AM 10:15:00 AM 12:47:00 PM 6:49:00 PM 10:00:00 PM 11:01:00 PM	8	0.00	0.00
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.						
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.						

Quantity	48	Total	771.56
Total Due			771.56

Exh 5, 5

INVOICE

Please Remit To

Priority Communications

Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue
DuBois, PA 15801
(814) 375-5260

VINERY AT WILCOX

Amount Paid \$		
3354-00002-0003	7/25/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

3354-00002-0003 O 7/25/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description: Partnership

Salesperson: Correll, Mel

Date	Day	Length		Qty	Rate	Total
7/25/2004	Sun		Sunny 106 WPartnership		395.00	395.00

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	0	Total	395.00
Total Due			395.00

INVOICE

Exh J, b

Please Remit To

Priority Communications

Sunny 106 WDSN & News-Talk 1420 WCED

51 West Long Avenue

DuBois, PA 15801

(814) 375-5260

WRK TECHNOLOGIES, INC.

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Amount Paid \$

3395-00002-0004	8/29/2004	1
Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

3395-00002-0004
8/29/2004
Purchase Order Number:
Co-Op: <<None>>
Description: 4PM NEWS
Salesperson: Correll, Mel

Date	Day	Length	Comments	Qty	Rate	Total
8/29/2004	Sun		Sunny 106 W4 PM News Sponsorship		280.00	280.00
Copy Name: 4905						
Advertising						
7/26/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/27/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/28/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/29/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/30/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/2/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/3/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/4/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/5/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/6/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/9/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/10/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/11/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
8/12/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	14	Total	280.00
Total Due			280.00

INVOICE

Exh K

WRK Technologies, Inc.

112 Mc Cracken Run Rd
Du Bois, PA 15801

Invoice

DATE	INVOICE #
4/16/2004	D11657

BILL TO

Priority Communications, Inc.
Attn: Accounts Payable
51 West Long Ave.
Du Bois, PA 15801

SHIP TO

Priority Communications, Inc.
51 W. Long Ave
Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL INSTRUCTIONS			
	4/16/2004						
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT		
	Net 10	4/16/2004	WRKJR				
ITEM	QTY	DESCRIPTION				EACH	AMOUNT
2286819133	2	Belkin 109 key Classic Keyboard PS/2 & AT - Black (F8E206-BLK)				19.95	39.90

Please remit to above address.

Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.

Subtotal	\$39.90
Sales Tax (6.0%)	\$2.39
Invoice Total	\$42.29
Payments/Credits	\$0.00
Balance Due	\$42.29

Exh L

WRK Technologies, Inc.

112 Mc Cracken Run Rd
Du Bois, PA 15801

Invoice

DATE	INVOICE #
11/9/2004	D12124

BILL TO

Priority Communications, Inc.
Attn: Accounts Payable
51 West Long Ave.
Du Bois, PA 15801

SHIP TO

Priority Communications, Inc.
51 W. Long Ave
Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL INSTRUCTIONS			
	11/9/2004						
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT		
	Net 10	11/9/2004	WRKJR				
ITEM	QTY	DESCRIPTION				EACH	AMOUNT
2458012163	1	Cables Unlimited / Dynatron Skt A CPU Fan for Athlon XP3000+, copper core (FAN-AMD-PLUS2)				29.95	29.95T

Please remit to above address.

Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.

Subtotal	\$29.95
Sales Tax (6.0%)	\$1.80
Invoice Total	\$31.75
Payments/Credits	\$0.00
Balance Due	\$31.75

Exh M

COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

PRIORITY COMMUNICATIONS, INC., : CIVIL ACTION – LAW
Plaintiff, :
vs. :
WRK TECHNOLOGIES, INC., :
Defendant. : No. 05 - 969 C. D.

CERTIFICATE OF SERVICE

I, William R. Kaltwasser, Jr. hereby swear or affirm that on the 20th day of March,
2006, a true and correct copy of the within Defendant/Counter-Plaintiff's Answer, New Matter
and Counter Complaint was sent via prepaid First Class Mail to the following:

Hopkins Heltzel LLP
Attn: David J. Hopkins, Esq.
Attorney for Plaintiff
900 Beaver Drive
Du Bois, PA 15801



William R. Kaltwasser, Jr.,
President & CEO
WRK Technologies, Inc.

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. : No. 05-969 C.D.
WRK TECHNOLOGIES INC., : Type of Pleading: Important
Defendant : Notice
: Filed on behalf of: Priority
: Communications, Inc., Plaintiff
: Counsel of Record for this party:
: HOPKINS HELTZEL LLP
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: 900 Beaver Drive
: DuBois, Pennsylvania 15801
: (814) 375-0300

Dated: March 20, 2006

FILED NOCC
01/15/2006
MAR 22 2006
WAS
William A. Shaw
Prothonotary/Clerk of Courts

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

PRIORITY COMMUNICATIONS, INC.,	:	
Plaintiff	:	
	:	
vs.	:	No. 05-969 C.D.
	:	
WRK TECHNOLOGIES INC.,	:	
Defendant	:	

TO: WKR Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801

DATE OF NOTICE: March 20, 2006

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Office of the Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, Pennsylvania 16830
(814) 765-2641


DAVID J. HOPKINS, ESQUIRE
Attorney for Plaintiff
Supreme Court No. 42519
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. : No. 05-969 C.D.
WRK TECHNOLOGIES INC., :
Defendant : Type of Pleading: Answer to
: New Matter and Counter Complaint
: and New Matter

WRK TECHNOLOGIES INC., :
Plaintiff :
vs. : Filed on behalf of: Priority
: Communications, Inc., Plaintiff
PRIORITy COMMUNICATIONS, INC., :
Defendant : Counsel of Record for this party:
: HOPKINS HELTZEL LLP
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: 100 Meadow Lane, Suite 5
: DuBois, Pennsylvania 15801
: (814) 375-0300

Dated: June 13, 2006

FILED NO CC
m73:0030
JUN 14 2006

William A. Shaw
Prothonotary/Clerk of Courts

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
vs. :
No. 05-969 C.D.

WRK TECHNOLOGIES INC., :
Defendant :

WRK TECHNOLOGIES INC.,
Plaintiff

vs.

PRIORITY COMMUNICATIONS, INC.,
Defendant

NOTICE

TO DEFENDANT:

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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.
:
WRK TECHNOLOGIES INC., :
Defendant :
:

WRK TECHNOLOGIES INC., :
Plaintiff :
:
vs. :
:
PRIORITY COMMUNICATIONS, INC., :
Defendant :
:

**ANSWER TO NEW MATTER AND COUNTER COMPLAINT
AND NEW MATTER**

NOW, comes the Plaintiff, Priority Communications, Inc., by and through its attorneys, Hopkins Heltzel LLP, and answers the New Matter and Counter Complaint of Defendant WRK Technologies, Inc. and files New Matter as follows:

ANSWER TO NEW MATTER

19. Denied. Plaintiff sets forth the total amount due from Defendant in Plaintiff's Complaint.
20. Denied. Plaintiff has plead a cause of action against Defendant.

WHEREFORE, Plaintiff requests this Honorable Court dismiss Defendant's New Matter with prejudice.

ANSWER TO COUNTER COMPLAINT

COUNT I

21. Neither admitted nor denied. Priority Communications, Inc. (hereinafter "Priority") is unable to admit or deny the allegations set forth in paragraph 21 and strict proof is demanded at trial.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted in part and denied in part. When WRK Technologies, Inc. (hereinafter "WRK") entered into the February 4, 2004 contract, the parties agreed that inasmuch as WCED was relatively new to Priority radio stations there would not be date and time billing. WRK was billed for the "News/Talk WCED" show.

26. Admitted.

27. Denied. WRK did not request time and date billing.

28. Admitted in part and denied in part. Priority admits WRK made payment for \$447.25. Priority denies WRK was not credited with said payment. Rather, the payment was posted by Priority on March 5, 2004.

29. Admitted.

30. Admitted in part and denied in part. Priority admits WRK had a credit balance of \$60.00 and had made payments of \$1,570.88. Priority denies having billed WRK only \$1,402.00. Rather, the amount billed was in excess of \$1,570.88. The

remaining averments of paragraph 30 are neither admitted nor denied and Priority demands strict proof at trial.

31. Admitted.

32. Admitted in part and denied in part. Priority admits WRK had payments and credits totaling \$2,410.33. Priority denies billing was only \$1,836.00. Priority's billing through June 25, 2005 was \$3,066.25. By way of further answer, Defendant was obligated to pay \$613.25 per month for WCED totaling \$3,066.25. Beginning April, 2004, WRK was obligated to pay \$434.00 per month, and as of the end of June, 2004, \$1,302.00 was due and owing for a total of \$4,368.25. The remaining allegations of paragraph 32 are denied.

33. Denied. Priority denies billing was only \$1,836.00. Other billing through June 25, 2005 was \$3,066.25. By way of further answer, Defendant was obligated to pay \$613.25 per month for WCED totaling \$3,066.25. Beginning April, 2004, WRK was obligated to pay \$434.00 per month, and as of the end of June, 2004, \$1,302.00 was due and owing for a total of \$4,368.25.

34. Denied. Priority denies billing was only \$1,836.00. Other billing through June 25, 2005 was \$3,066.25. By way of further answer, Defendant was obligated to pay \$613.25 per month for WCED totaling \$3,066.25. Beginning April, 2004, WRK was obligated to pay \$434.00 per month, and as of the end of June, 2004, \$1,302.00 was due and owing for a total of \$4,368.25.

35. After reasonable investigation, Priority is unable to admit or deny the allegations in paragraph 35 and strict proof is demanded at trial.

36. Denied. The balances shown on Priority statements were accurate.

37. Admitted in part and denied in part. Priority admits having a sales person contact WRK regarding WRK's past due amount and that payment was due immediately. Priority denies asking WRK for more money than was owed.

38. Admitted in part and denied in part. Priority admits sending an amended bill. Priority denies the amended bill was an error. Priority does not dispute that the Winery at Wilcox's July WDSN billing may have been inadvertently sent to WRK.

39. Denied. At all material times, Priority billing was accurate.

40. Denied. WRK did not make payments pursuant to its contract.

41. Denied. WRK did not make payments in excess of the amount billed. Rather, WRK consistently ran a deficit balance.

WHEREFORE, Priority Communications, Inc. respectfully requests WRK Technologies, Inc.'s Counter Complaint be dismissed with prejudice.

COUNT II – BREACH OF CONTRACT

42. Priority Communications, Inc. repeats its answer to averments 21 through 41 and incorporates same as if set forth herein.

43. Denied. Priority did not breach its contract to WRK. Rather, WRK breached its contract to Priority by failing to make payment on a monthly basis as required by the contract.

44. Denied. At all material times, representatives of Priority attempted to answer any billing issues raised by WRK.

45. Denied. At all material times, Priority was prepared to carry out the terms of the contract. Only WRK's breach of the contract by failing to make payment lead to the cancellation of WRK's advertising.

46. Denied. At all material times, Priority was prepared to carry out the terms of the contract. Only WRK's breach of the contract by failing to make payment lead to the cancellation of WRK's advertising.

47. Denied. At all material times, Priority was prepared to carry out the terms of the contract. Only WRK's breach of the contract by failing to make payment lead to the cancellation of WRK's advertising.

WHEREFORE, Priority Communications, Inc. respectfully requests WRK Technologies, Inc.'s Counter Complaint be dismissed with prejudice.

COUNT III – UNFAIR AND DECEPTIVE TRADE PRACTICES

48. Priority Communications, Inc. repeats its answer to averments 21 through 47 and incorporates same as if set forth herein.

49. Denied. At all material times hereto, Priority provided advertising to WRK as provided in its contract until such time as WRK breached its contract by failing to make payment.

50. Denied. At all material times hereto, Priority provided billing and statement to WRK as per the contract and as per advertising supplied by Priority for and on behalf of WRK.

51. Admitted in part and denied in part. Priority admits to missing several spots on behalf of WRK. The value of said spots was less than \$63.20.

52. Denied. Exhibit "K" is billing for \$280.00 which Priority further denies. Said billing is for the period of July 26, 2004 through August 12, 2004.

53. Denied.

WHEREFORE, Priority Communications, Inc. respectfully requests WRK Technologies, Inc.'s Counter Complaint be dismissed with prejudice.

COUNT IV – UNJUST ENRICHMENT

54. Priority Communications, Inc. repeats its answer to averments 21 through 53 and incorporates same as if set forth herein.

55. Admitted.

56. Admitted.

57. Admitted.

58. Admitted.

59. Admitted.

60. Admitted.

WHEREFORE, WRK is entitled to a credit in the amount it owes Plaintiff of \$74.04.

NEW MATTER

61. WRK's claims are barred by the applicable statute of limitations.

62. WRK's claims are barred by WRK's failure to attend advertising sessions on WCED.

63. WRK's claims are barred or reduced as a result of the set off for moneys WRK owes Priority.

64. WRK's claims are barred or reduced inasmuch as any losses WRK may have sustained were caused by the actions of WRK.

WHEREFORE, Priority Communications, Inc. respectfully requests WRK Technologies, Inc.'s Counter Complaint be dismissed with prejudice.

Respectfully submitted,



David J. Hopkins, Esquire

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the statements made in this pleading are true and correct.



Jeannie Hunter

Dated: June 9, 2006

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.
:

WRK TECHNOLOGIES INC., :
Defendant :
:

WRK TECHNOLOGIES INC., :
Plaintiff :
:
vs. :
:
PRIORITY COMMUNICATIONS, INC., :
Defendant :
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Answer to
New Matter, Counter Claim and New Matter filed on behalf of Plaintiff, Priority
Communications, Inc., was forwarded on the 13th day of June, 2006 by U.S. Mail, first
class, postage prepaid, to:

WRK Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801



David J. Hopkins, Esquire
Attorney for Plaintiff
Supreme Court No. 42519

U.P.
FILED

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL TRIAL LISTING

AUG 21 2006

0/22/05 (w)

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF READINESS

TO THE PROTHONOTARY

DATE PRESENTED August 21, 2006

CASE NUMBER TYPE TRIAL REQUESTED ESTIMATED TRIAL TIME

Date Complaint () Jury () Non-Jury
Filed: (x) Arbitration 1/2 days/hours
July 27, 2005

PLAINTIFF(S)

PRIORITY COMMUNICATIONS, INC. () Check block if a Minor
DEFENDANT(S) is a Party to the Case

WRK TECHNOLOGIES, INC. () 2005 - 969-CJ
ADDITIONAL DEFENDANT(S)

()

JURY DEMAND FILED BY:

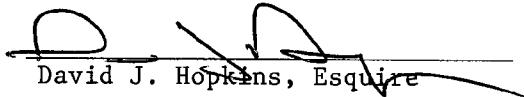
DATE JURY DEMAND FILED:

N/A N/A

AMOUNT AT ISSUE CONSOLIDATION DATE CONSOLIDATION ORDERED
\$3,511.29 plus pre-judgment interest, post-judgment interest and cost of suit
More than
& () yes (x) no N/A

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.

I certify that all discovery in the case has been completed; all necessary parties and witnesses are available; serious settlement negotiations have been conducted; the case is ready in all respects for trial, and a copy of this Certificate has been served upon all counsel of record and upon all parties of record who are not represented by counsel:



David J. Hopkins, Esquire

FOR THE PLAINTIFF

TELEPHONE NUMBER

David J. Hopkins, Esquire
FOR THE DEFENDANT

(814) 375-0300
TELEPHONE NUMBER

William R. Kaltwasser, Jr., pro se
FOR ADDITIONAL DEFENDANT

(814) 375-9130
TELEPHONE NUMBER

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

PRIORITY COMMUNICATIONS :
vs. : No. 05-969-CD
WRK TECHNOLOGIES, INC. :

ORDER

NOW, this 22nd day of November, 2006, it is the ORDER of the Court
that the above-captioned matter is scheduled for Arbitration on **Tuesday, December 19, 2006**
at 1:00 P.M. The following have been appointed as Arbitrators:

Frederick M. Neiswender, Esquire, Chairman

Warren B. Mikesell, II, Esquire

John R. Ryan, Esquire

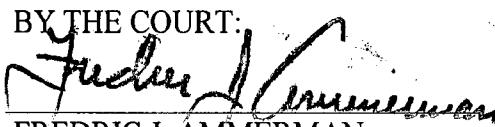
Pursuant to Local Rule 1306A, you must submit your Pre-Trial Statement seven
(7) days prior to the scheduled Arbitration. **The original should be forwarded to the Court**
Administrator's Office and copies to opposing counsel and each member of the Board of
Arbitrators. For your convenience, a Pre-Trial (Arbitration) Memorandum Instruction Form
in enclosed as well as a copy of said Local Rule of Court.

Please report to Hearing Room No. 3, 2nd Floor, Clearfield County Courthouse,
Clearfield, PA.

FILED 6CC
01350201 CIA
NOV 22 2006
[Handwritten Signature]

William A. Shaw
Prothonotary/Clerk of Courts

BY THE COURT:


FREDRIC J. AMMERMAN
President Judge

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Priority Communications, Inc.

vs.

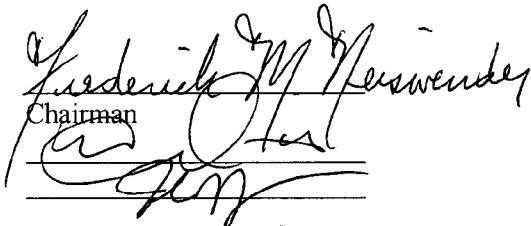
WRK Technologies, Inc.

No. 2005-0969-CD

OATH OR AFFIRMATION OF ARBITRATORS

Now, this 19th day of December, 2006, we the undersigned, having been appointed arbitrators in the above case do hereby swear, or affirm, that we will hear the evidence and allegations of the parties and justly and equitably try all matters in variance submitted to us, determine the matters in controversy, make an award, and transmit the same to the Prothonotary within twenty (20) days of the date of hearing of the same.

Frederick M. Neiswender, Esq.

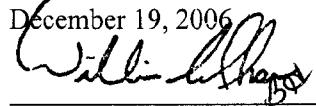


Frederick M. Neiswender
Chairman

Warren B. Mikesell, II, Esq.

John R. Ryan, Esq.

Sworn to and subscribed before me this
December 19, 2006

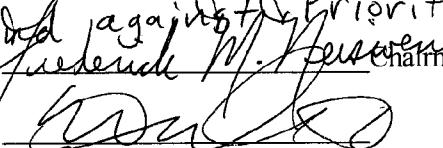

Prothonotary

AWARD OF ARBITRATORS

Now, this 19th day of December, 2006, we the undersigned arbitrators appointed in this case, after being duly sworn, and having heard the evidence and allegations of the parties, do award and find as follows:

Judgment in favor of Priority Comm., Inc. and against
WRK Technologies, Inc. in the amount of \$3,393.88. Judgment
in favor of WRK Tech., Inc. and against Priority Comm., Inc.
in the amount of \$79.98.




Frederick M. Neiswender

(Continue if needed on reverse.)

ENTRY OF AWARD

Now, this 19th day of December, 2006, I hereby certify that the above award was entered of record this date in the proper dockets and notice by mail of the return and entry of said award duly given to the parties or their attorneys.

WITNESS MY HAND AND THE SEAL OF THE COURT


Prothonotary

By _____

CC. ✓

Priority Communications, Inc.

Vs.

WRK Technologies, Inc.

: IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY
: No. 2005-00969-CD

NOTICE OF AWARD

TO: WRK TECHNOLOGIES, INC.
DAVID J. HOPKINS, ESQ.

You are herewith notified that the Arbitrators appointed in the above case have filed their award in this office on December 19, 2006 and have awarded:

Judgment in favor of Priority Comm., Inc. and against WRK Technologies, Inc. in the amount of \$3,393.88. Judgment in favor of WRK Tech., Inc. and against Priority Comm., Inc. in the amount of \$79.98.

William A. Shaw
Prothonotary
By W.A. Shaw

December 19, 2006

Date

In the event of an Appeal from Award of Arbitration within thirty (30) days of date of award.

WA

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

PRIORITY COMMUNICATIONS, INC.,
Plaintiff,

vs.

WRK TECHNOLOGIES, INC.,
Defendant.

WRK TECHNOLOGIES, INC.,
Counter-Plaintiff

vs.

PRIORITY COMMUNICATIONS, INC.,
Counter Defendant

: CIVIL ACTION - LAW

:

: No. 05 - 969 C. D.

:

: Type of Filing:

: Pre-Trial Memorandum

:

:

:

:

:

: Filed on Behalf of:

: Defendant/Counter-Plaintiff

:

:

: Filed by: William R. Kaltwasser, Jr.

: Pro Se

: President and CEO

: WRK Technologies, Inc.

: 112 McCracken Run Road

: Du Bois, PA 15801

: (814) 375-9130

:

:

: William R. Kaltwasser, Jr.

: President and CEO

: WRK Technologies, Inc.

: 112 McCracken Run Road

: Du Bois, PA 15801

: (814) 375-9130

Date: December 12, 2006

RECEIVED
DEC 12 2006
COUNTY AD
OFFICE

BRIEF STATEMENT OF CASE

Priority Communications alleged that we did not pay for advertising services claimed to be rendered.

We allege Priority Communications did not provide all services that were contracted, further we alleged that Priority Communications did not provide customary itemized billing, nor for that matter any billing at all for several months.

We further allege that Priority communications unilaterally cancelled their 'non-cancelable' contract by failing to provide contracted advertising even before providing verbal notice (via a phone call from our salesperson) to us that we had been pulled off the air.

We also allege that after the verbal contact was made informing us that our ads had been pulled and we clearly stated that if our ads were pulled off we would not advertise with them that they continued, without notice or approval, to run a portion of the advertising on one station to allow them to bill us for further services.

Priority Communications also has charged interest at a rate of 8% per annum without any agreement to such rate, whereas under Pennsylvania state law the maximum annual interest rate barring an agreement to the contrary is 5% per annum.

Finally we allege that Priority communications did continue to make purchases from us on credit terms and that we have neither been paid for nor was credit issued any amounts alleged by Priority to be owed to them.

CITATION TO APPLICABLE STATUTES

With respect to contract breach and termination the restatement of contracts 2d.

With respect to rate of interest 41 P.S. §201 & §202.

WITNESSES

Ann M. McGee, operations manager.

STATEMENT OF DAMAGES

\$79.85 in unpaid invoices (attached) plus applicable interest from date of invoice.

Loss of income during the back to school season as our advertising was not run as contracted in an amount to be determined.

Recovery of amounts overpaid for services not rendered which to this date remain unbilled and unsubstantiated by Plaintiff. This amount is undetermined as we have not been provided with appropriate documentation by Plaintiff.

Respectfully Submitted:



William R. Kaltwasser, Jr., Vice President and CEO
WRK Technologies, Inc.

WRK Technologies, Inc.

112 Mc Cracken Run Rd
Du Bois, PA 15801

Invoice

DATE	INVOICE #
11/9/2004	D12124

BILL TO

Priority Communications, Inc.
Attn: Accounts Payable
51 West Long Ave.
Du Bois, PA 15801

SHIP TO

Priority Communications, Inc.
51 W. Long Ave
Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL	INSTRUCTIONS	
	11/9/2004					
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT	
	Net 10	11/9/2004	WRKJR			
ITEM	QTY	DESCRIPTION			EACH	AMOUNT
2458012163	1	Cables Unlimited / Dynatron Skt A CPU Fan for Athlon XP3000+, copper core (FAN-AMD-PLUS2)			29.95	29.95

Please remit to above address.

Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.

Subtotal	\$29.95
Sales Tax (6.0%)	\$0.00
Invoice Total	\$29.95
Payments/Credits	\$0.00
Balance Due	\$29.95

WRK Technologies, Inc.

112 Mc Cracken Run Rd
Du Bois, PA 15801

Invoice

DATE	INVOICE #
4 16/2004	D11657

BILL TO

Priority Communications, Inc.
Attn: Accounts Payable
51 West Long Ave.
Du Bois, PA 15801

SHIP TO

Priority Communications, Inc
51 W. Long Ave
Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL INSTRUCTIONS		
	4/16/2004					
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT	
	Net 10	4/16/2004	WRKJR			
ITEM	QTY	DESCRIPTION			EACH	AMOUNT
2286819133	2	Belkin 109 key Classic Keyboard PS/2 & AT - Black (F8E206-BLK)			19.95	39.90

Please remit to above address.

Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.

Subtotal	\$39.90
Sales Tax (6.0%)	\$0.00
Invoice Total	\$39.90
Payments/Credits	\$0.00
Balance Due	\$39.90

Maholik
Sinday

COMMONWEALTH OF PENNSYLVANIA

County of: **CLEARFIELD**Mag. Dist. No.: **46-3-01**MDJ Name: Hon.: **PATRICK N FORD**Address: **309 MAPLE AVENUE
PO BOX 452
DUBOIS, PA 15801**Telephone **(814) 371-5321****BENCH WARRANT**Commonwealth of Pennsylvania
VS.

NAME and ADDRESS

**FREELAND, ROBERT THOMAS
100 MARKET ST APT. # A
PO BOX 491
MILESBURG, PA 16853**Complaint No:
NCIC OFF:
OOC:Docket No: **CR-0000556-06**
Date Filed: **11/03/06**
OTN: **K 510701-2**Warrant Control No: **46-3-01-BW-0285697-2006**Issued For: **FREELAND, ROBERT THOMAS**
Reason for Warrant: **FAILURE TO APPEAR**

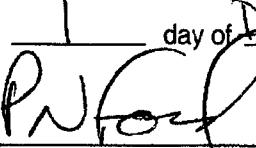
Charge(s):

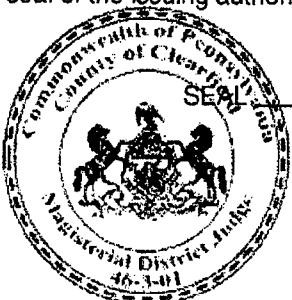
Offense Date

S 18 S4105 SSA1* BAD CHECKS - COURT CASE**09/06/06****TO POLICE OFFICER:**

In the name of the Commonwealth of Pennsylvania, you are commanded to take the defendant, **FREELAND, ROBERT THOMAS**, into custody. When the defendant is taken into custody, promptly take defendant for a hearing on the bench warrant as provided in Pa.R.Crim.P.150. Pursuant to Pa.R.Crim.P.150(A)(5)(b), the subject of this warrant shall not be detained without a hearing on this bench warrant longer than 72 hours, or the close of the next business day if the 72 hours expires on a non-business day.

Witness the hand and official seal of the issuing authority on this

1 day of December, 2006

 (Signature)



BENCH WARRANT**RETURN WHERE DEFENDANT FOUND**

By authority of this warrant, on _____, 20 _____

I took into custody the within named _____, and he/she is
 before you for disposition.
 in the _____ Prison.

RETURN WHERE DEFENDANT IS NOT FOUND

After careful search, I cannot find the within named defendant.

Officer's Cost:		
Warrant		
Miles @ ¢		
Commitments		
Miles @ ¢		
Conveying to hearing		
Miles @ ¢		
Total		

(Signature of Police Officer - Name and Title)

DEFENDANT CONTACT INFORMATION

ADDRESS:	FREELAND, ROBERT THOMAS 100 MARKET ST APT. # A PO BOX 491 MILESBURG, PA 16853			TELEPHONE: (814)
----------	--	--	--	------------------

DEFENDANT IDENTIFICATION INFORMATION:

LiveScan Tracking Number		Social Security Number		SID(State Identification Number)			
		212-78-5595					
Driver's License Information		License Number 22867384			State PA	Expiration Date 00/00/00	
DEFENDANT VEHICLE INFORMATION							
Plate Number		State	Hazmat	Registration Sticker (MM/YY)	Comm'l Veh. Ind	School Veh.	Oth.Veh.Cd
				00 /0000			Y
DEFENDANT IDENTIFICATION INFORMATION							
AGE 35	RACE W	ETHNICITY	GENDER M	EYE COLOR	HAIR COLOR	DATE OF BIRTH 1/13/71	WEIGHT(lbs) 000
NCIC Extradition Code / Description Distance							

ALIAS: _____

Mag. Dist. No.: 46-3-01 Docket Number: CR-0000556-06

Page 2 of 2

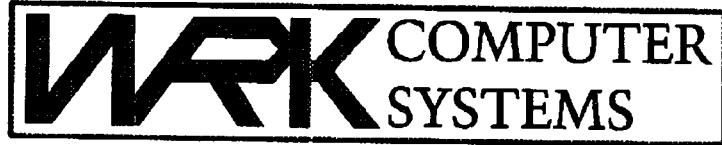
MAG. DIST. JUDGE

AOPC 417EA-06

DATE PRINTED: 12/01/06

1:47:43 PM

Crmbw



112 McCracken Run Rd, Du Bois, PA 15801 (814) 375-9130, Fax (814) 375-9173
301 West Main Street, Brookville, PA 15825 (814) 849-0591, Fax (814) 849-0529
Operated & Managed by WRK Technologies, Inc.

Facsimile Transmittal Sheet

to:

from:

RONDA J. WISORE
company:

WILLIAM R. KAUFWASSER, JR
date:

CLEARFIELD COUNTY COURT HOUSE
fax number:

12-12-2006

total no. of pages including cover:

814-765-7649
Phone number:

6

sender's reference number:

814-765-2641 x 1300
Re: 05-969-CD

Your reference number:

Urgent

For Review

Please Comment

Please Reply

Please Recycle

Notes/Comments:

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

PRIORITY COMMUNICATIONS, INC.,
Plaintiff

vs.

No. 05-969 C.D.

RECEIVED

WRK TECHNOLOGIES INC.,
Defendant

DEC 12 2006

~~COURT ADMINISTRATION
OFFICE~~

WRK TECHNOLOGIES INC.,
Plaintiff

vs.

Filed on behalf of: Priority
Communications, Inc., Plaintiff

PRIORITY COMMUNICATIONS, INC.,
Defendant

Type of Pleading: Pre-Trial Memorandum

Filed on behalf of: Priority
Communications, Inc.

Counsel of Record for this party:

HOPKINS HELTZEL LLP

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.
:

WRK TECHNOLOGIES INC., :
Defendant :
:

WRK TECHNOLOGIES INC., :
Plaintiff :
:

vs. :
:
PRIORITY COMMUNICATIONS, INC., :
Defendant :
:

PRE-TRIAL MEMORANDUM

AND NOW, comes Plaintiff, Priority Communications, Inc., by and through it attorneys, Hopkins Heltzel LLP, and files the within Pre-Trial Memorandum for use at Arbitration Hearing scheduled for December 19, 2006 at 1:00 p.m.:

I. STATEMENT OF THE FACTS

This is a collection case. Priority Communications, Inc. is the owner of two (2) radio stations in the greater DuBois area: WCED-AM and WDSN-FM.

For many years, Defendant advertised on Plaintiff's FM radio station. Defendant's account became delinquent and Defendant did not advertise until such time as his account was paid in full.

On February 4, 2004, Plaintiff and Defendant entered into an agreement that is set forth on Exhibit "A". The agreement was a discounted price based upon Defendant advertising for a one year period.

Defendant advertised on the FM station during the 4:00 p.m. news, Monday through Friday, at the rate of \$434.00 per month.

Defendant advertised on the AM station with 8 sixty second spots each Friday and Saturday and 6:00 am. to noon. Defendant's monthly fee was \$613.25.

Defendant was also entitled to present a "Ask the Expert Show" once per week.

Defendant never showed up for the "Ask the Expert Show". Defendant's account became delinquent. In August of 2005, Plaintiff terminated Defendant's advertisements until such time as he was paid current. Defendant has not paid any additional monies to Plaintiff. Plaintiff filed suit at the District Magistrate level and received an award that Defendant has appealed.

The total amount due and owing Plaintiff is \$3,170.48 with interest from August 2004.

II. CITATIONS TO APPLICABLE CASES OR STATUTES. There are no unique points of law.

III. LIST OF WITNESSES

Melvin Correll
Priority Communications

Deeanne Stanton
Priority Communications

William R. Kaltwasser, Jr.
WRK Technologies, Inc.

Plaintiff reserves the right to amend this list of witnesses at any time prior to arbitration upon notice to Defendant. Further, Plaintiff reserves the right to call any witnesses identified in Defendant's Pre-Trial Memorandum.

IV. STATEMENT OF DAMAGES

Amount Due:

	WCED AM	SUNNY 106 FM
February	\$ 613.25	\$ 434.00
March	\$ 613.25	\$ 434.00
April	No Charge	\$ 434.00
May	No Charge	\$ 434.00
June	\$ 613.25	\$ 434.00
July	\$ 613.25	\$ 434.00
August	\$ 306.62	\$ 217.00
Subtotal	\$2,759.61	\$ 2,821.00
TOTAL DUE		\$ 5,580.61

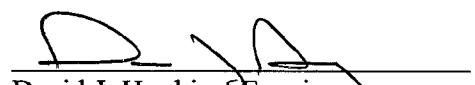
WRK Payments:

	PAYMENTS	SUNNY 106 FM
January	\$ 60.00	Beginning Credit
February	\$ 600.00	February 23, 2004
March	\$ 447.25	March 2, 2004
	\$ 523.63	March 18, 2004
April		
May		
June	\$ 779.25	June 25, 2004
July		
August		
TOTAL PAYMENTS	\$ 2,410.13	

Recap:

AMOUNT DUE	\$ 5,580.61
DEFENDANTS PAYMENTS	\$ 2,410.13
SHORTFALL	\$ 3,170.48
Interest – 850 days @ .5212 (6%)	\$ 443.02
District Magistrate Filing Fees	\$ 87.00
AMOUNT DUE PLAINTIFF	\$ 3,700.50

HOPKINS HELTZEL LLP



David J. Hopkins, Esquire
Attorney for Priority Communications, Inc.

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
:
vs. : No. 05-969 C.D.

WRK TECHNOLOGIES INC., :
Defendant :
:
:

WRK TECHNOLOGIES INC., :
Plaintiff :
:
:

vs. :
:
:

PRIORITY COMMUNICATIONS, INC., :
Defendant :
:
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing Pre-trial Memorandum filed on behalf of the Priority Communications, was delivered on the 11th day of December, 2006, by United States Mail, postage prepaid, to all counsel of record, addressed as follows:

WRK Technologies, Inc.
112 McCracken Run Road
DuBois, PA 15801

Frederick M. Neiswender, Esquire
211 ½ E. Second Street
Clearfield, PA 16830

Warren B. Mikesell, II, Esquire
115 East Locust Street
Clearfield, PA 16830

John R. Ryan, Esquire
15 N. Front Street
P.O. Box I
Clearfield, PA 16830



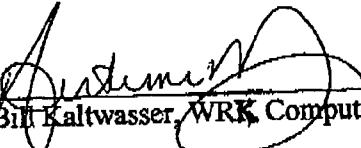
David J. Hopkins, Esquire
Attorney for Priority Communications, Inc.

PARTNERSHIP AGREEMENT

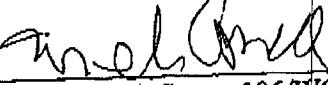
The following partnership is an agreement between Sunny 106, WCED and WRK Computer Systems. Sunny 106 and WCED agree to provide the following:

- Sunny 106 4 p.m. news 2/2/04-1/28/05
- 8 60s/day each Fri & Sat 6a-mid on News/Talk WCED 1/30/04-1/22/05
- Ask The Expert show once/week Feb '04-Jan '05

The partnership is based on an annual investment of \$12,567 to be billed in 12 monthly investments of \$434/month on Sunny 106 and \$613.25 on News/Talk WCED. Since the partnership is based on an annual discounted price, this agreement is non-cancelable by either party. However, it is mutually agreed that if it is in the best interest of both parties to terminate the agreement, it is agreed that Sunny 106 and News/Talk WCED are entitled to short rates.



Bill Kaltwasser, WRK Computer Systems



Mel Correll, Sunny 106/WCED

Date 2-4-04

CLARKSON COMMERCIAL FUND, INC.
51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of } SS: _____
County of } _____

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Met this day of 20

WRK020 WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Page 11

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE 2/29/04

2/29/04

Invoice # 402337

My Commission Expires

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				60.00-
2/23/04	PAYMENTS - CHECK # 1938				600.00-
	CONTRACT 41154				
1/26/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/27/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/28/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
1/30/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	20.00
2/03/04	3pm NEWS/WX	WDSN FM 3:00p	60	1	20.00
2/04/04	11:20 AM	SUBTOTAL	100.00		20.00
	CONTRACT 42146 / 4PM NEWS SPONSOR				
2/20/04	WDSN FM 4:00p		60	1	0.00
2/01/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/03/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/04/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/05/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/06/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/09/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/10/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/11/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/12/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/13/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/16/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/17/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/18/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

AMOUNT DUE IN 90 DAYS FROM THE FOLLOWING DATE OF PURCHASE:			
CURRENT	30 DAYS	60 DAYS	90 AND OVER

51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of _____ } SS:
County of _____ }
The Undersigned Having Been Duly Sworn, Deposes
and Says That Broadcasting Service Has Been Rendered
by Radio Station _____ in Accordance With
the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

..... **NOTARY PUBLIC**

My Commission Expires

2/29/04
Invoice # 402337

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
>>>>>>>>>>>>>>> CONTINUATION FROM PREVIOUS PAGE >>>>>>>>>>>>>>					
2/19/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/23/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/24/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/25/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/26/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/27/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
2/29/04	WDSN FM ADVERTISING PACKAGE				434.00
	SUBTOTAL	434.00			
Total Sales	-----	534.00	25		

THANK YOU FOR CHOOSING WDSN-FM, WQKY-FM AND
WLEM-AM

SalesRep : MEL CORRELL

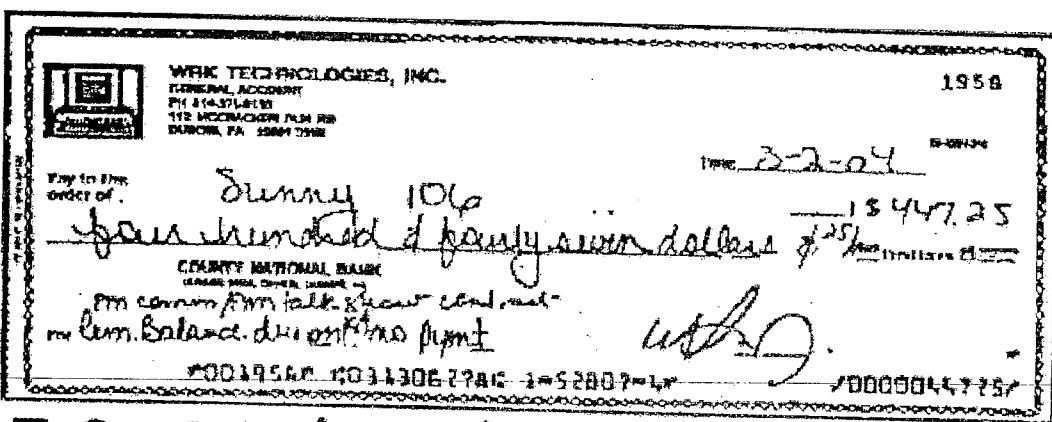
A Finance Charge is computed by a **PERIODIC RATE OF 1 1/2% PER MONTH**, which is an **ANNUAL PERCENTAGE RATE OF 18%**, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER	
426.00*	0.00	0.00	0.00	426.00*

THIS INVOICE WAS PREPARED FROM OFFICIAL STATION PROGRAM LOGS

DO NOT PAY THIS AMOUNT

Exh A. 1



#1956 03/04/2004 \$447.25#

Exhibit B

~~CONFIDENTIAL~~ PRIORITY COMMUNICATIONS, INC.
51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of

County of

By
.....

Subscribed and Sworn to Before

Me this day of 20

WRK020 WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE

3/28/06

Invoice # 403235

My Commission Expires

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				✓ 126.00-
3/19/04	PAYMENTS - CHECK # 1670				✓ 523.68-
	CONTRACT 42146 / 4PM NEWS SPONSOR				
3/01/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/02/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/03/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/04/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/05/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/08/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/09/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/10/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/11/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/12/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/15/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/16/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/17/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/18/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/19/04	4pm NEWS/WX	WDSN FM 4:00p	50	1	0.00
3/22/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/23/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/24/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/25/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/26/04	4pm NEWS/WX	WDSN FM 4:00p	60	1	0.00
3/28/04	WDSN FM ADVERTISING PACKAGE				434.00
	SUBTOTAL	434.00			

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

THIS INVOICE WAS PREPARED FROM OFFICIAL STATION PROGRAM LOGS

FRANCIS COLUMBUS COMMUNICATIONS, INC.
51 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of _____ } SS:
County of _____ }
The Undersigned Having Been Duly Sworn, Deposes
and Says That Broadcasting Service Has Been Rendered
by Radio Station _____ in Accordance With
the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

..... NOTARY PUBLIC

My Commission Expires

INVOICE AND STATEMENT

Page 2

WRK020 WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Advertiser: WRK TECHNOLOGIES, INC.

BILLING DATE 5/28/04
Invoice # 403235

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
>>>>>>	>>>>>>>>> CONTINUATION FROM PREVIOUS PAGE >>>>>>>>>>>>>>>				
	Total Sales ----- 434.00		20		

THANK YOU FOR CHOOSING WDSN-FM, WOKY-FM AND
WLEM-AM

SalesRep: MEL CORRELL

A Finance Charge is computed by a **PERIODIC RATE OF 1 1/2% PER MONTH**, which is an **ANNUAL PERCENTAGE RATE OF 18%**, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
\$15.85	0.00	0.00	0.00

THIS INVOICE WAS PREPARED FROM OFFICIAL STATION PROGRAM LOGS

PLEASE PAY THIS AMOUNT

Exh C.2

Priority Communications, Inc.
51 West Long Avenue
DuBois, PA 15801

Statement

Date
6/22/2004

To:
WRK Computer Systems, Inc 112 McCracken Run Road DuBois, PA 15801
NewsTalk 1470 WGED

Date	Transaction	Amount Due	Amount Enc.		
		Amount	Balance		
04/25/2004	Balance forward	\$779.25	779.25		
<i>✓ \$200 e Tech \$779.25 6-25-04</i>					
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
0.00	0.00	0.00	613.25	166.00	\$779.25

Exh D

21-14831 (44, 44700)

AFFIDAVIT OF SERVICE RENDERED

State of

County of

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

WRK120 WEB TECHNOLOGIES, DIV.
112 SOUPACK DR., APT. 400
16603, PA 15632

..... NOTARY PUBLIC

advantages of the new system. - 115

BILLING DATE

... NOTARY PUBLIC

My Commission Expires

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				455.60
	CONTRACT CALLS / RATES TO BE CHARGED				
6/31/04	1PM NEWS	10:00p	1	0.00	0.00
6/01/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/02/04	1PM NEWS/WT	10:00p	1	0.00	0.00
6/03/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/04/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/05/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/06/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/07/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/08/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/09/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/10/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/11/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/12/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/13/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/14/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/15/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/16/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/17/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/18/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/19/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/20/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/21/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/22/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/23/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/24/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/25/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/26/04	1PM NEWS/WX	10:00p	1	0.00	0.00
6/27/04	1PM NEWS/WX	10:00p	1	0.00	0.00
	1PM NEWS/WT	10:00p	1	0.00	0.00
					455.60

A Finance Charge is computed by a **PERIODIC RATE OF 1 1/2% PER MONTH**, which is an **ANNUAL PERCENTAGE RATE OF 18%**, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER	

52 WEST LONG AVENUE
DUBOIS, PA 15801

AFFIDAVIT OF SERVICE RENDERED

State of

County of

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station _____ in Accordance With the Accompanying Statement:

By

Subscribed and Sworn to Before

Me this day of 20

WRK020 WRK TECHNOLOGIES, INC.
112 MCCRAYCREK RUN ROAD
DUBOIS, PA 15801

10000

Advertiser: MRK TECHNOLOGIES, INC.

BILLING DATE

6/27/04
Invoice # 406218

My Commission Expires

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
***** INFORMATION FROM PREVIOUS PAGE *****					
	Total Sales	434.00			
	Finance Charge	9.79	20		

THANK YOU FOR CHOOSING WILHELM, WOKKEN AND WLEMONT

Chapitre 3 : HTML DOM

A Finance Charge is computed by a PERIODIC RATE OF 1 1/2% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
443.79	351.89	343.77	9.00

THIS INVOICE WAS PREPARED FROM OFFICIAL STATION PROGRAM LOGS
TIMES SHOWN ABOVE ARE ACCURATE PLUS OR MINUS 3 MIN

PLEASE PAY THIS AMOUNT

Exhibit 2

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

06/27/04

DuBois, PA 15801
(814) 375-5260

Charges or Payments received after this date will appear on next
Terms:

A/R Cash-WCED-AM

WRK COMPUTER
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date			Amount
6/27/2004	3397-00003-0002	* Invoice	613.25

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jun	May	Apr	Mar +	Please Pay This Amount
613.25	0.00	0.00	0.00	613.25

Exh G,1

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

WRK COMPUTER

WRK COMPUTER
 112 MCCRACKEN RUN ROAD
 DUBOIS, PA 15801

Amount Paid \$		
Official Invoice	Date	Page
3397-00003-0002	6/27/2004	1

DETACH AND RETURN WITH PAYMENT

3397-00003-0002 O 6/27/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description:

Salesperson: Correll, Mel

Date	Day	Length	Comments	Qty	Rate	Total
6/27/2004	Sun		News-Talk 1		613.25	613.25
6/18/2004	Fri	1:00	Advertising News-Talk 1 7:22:30 AM 9:05:30 AM 12:04:30 PM 1:44:00 PM 4:29:00 PM 5:40:00 PM 6:46:00 PM 10:58:00 PM	8	0.00	0.00
6/19/2004	Sat	1:00	Advertising News-Talk 1 7:22:00 AM 8:22:00 AM 8:56:00 AM 10:23:00 AM 11:23:00 AM 12:19:00 PM 2:58:00 PM 4:58:30 PM	8	0.00	0.00
6/25/2004	Fri	1:00	News-Talk 1 6:04:30 AM 7:11:10 AM 8:22:10 AM 9:19:00 AM 12:58:50 PM 2:18:00 PM 6:51:00 PM 11:59:00 PM	8	0.00	0.00
6/26/2004	Sat	1:00	News-Talk 1 6:04:00 AM 7:04:00 AM 8:56:00 AM 10:59:00 AM 2:04:00 PM 2:58:00 PM 10:04:00 PM 10:58:00 PM	8	0.00	0.00
<i>Missing 4 days @ 85 spots each.</i> <i>32 spots missing?</i>						

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	32	Total	613.25
Total Due			613.25

Exh G, 2

INVOICE

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash-WCED-AM

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date				Amount
6/27/2004	3395-00003-0000	Invoice		613.25
7/25/2004	F/C-7-2004	Current Finance Charge		9.20

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS
THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS

Jul	Jun	May	Apr +	Please Pay This Amount
9.20	613.25	0.00	0.00	622.45

Exh #

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash - WDSN-FM

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date				Amount
3/19/2004	516	1670		-215.63
4/25/2004	ADJ-303	Invoice April 2004 DARTS		434.00
5/30/2004	ADJ-512	Invoice May 2004 DARTS		434.00
5/30/2004	ADJ-513	Invoice May 2004 DARTS FC		3.28
6/27/2004	3395-00002-0002	Invoice: 4PM NEWS		434.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge		9.83
7/25/2004	F/C-7-2004	Current Finance Charge		16.34

*Putting F/C
on F/C + on old
balance.*

16.34

Please remit payment at once!

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
16.34	443.83	437.28	218.37	1,115.82

Exh I

Priority Communications, Inc
51 West Long Avenue
DuBois, PA 15801

August 16, 2004

Dear Valued Advertiser,

Please find enclosed an amended statement and invoice for your July advertising. We were experiencing computer software issues and all charges were not applied to the statement you may have received a week or so ago. Please accept my apologies and if you should have any questions or concerns please feel free to contact me.

Sincerely,



Deeanne M. Stanton
Billing Manager

Exh J, 1

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash - WDSN-FM

WRK TECHNOLOGIES, INC.
112 MCCRACKEN RUN ROAD
DUBOIS, PA 15801

Date				Amount
3/19/2004	516	1670	-215.63	
4/25/2004	ADJ-303	Invoice April 2004 DARTS	434.00	218.37
5/30/2004	ADJ-512	Invoice May 2004 DARTS	434.00	434.00
5/30/2004	ADJ-513	Invoice May 2004 DARTS FC	3.28	3.28
6/27/2004	3395-00002-0002	Invoice: 4PM NEWS	434.00	434.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge	9.83	9.83
7/25/2004	3395-00002-0003	Invoice: 4PM NEWS	434.00	434.00
7/25/2004	3395-00003-0001	Invoice	613.25	613.25

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
1,047.25	443.83	437.28	218.37	2,146.73

Exh. 2

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

WRK TECHNOLOGIES, INC.

WRK TECHNOLOGIES, INC.
 112 MCCRACKEN RUN ROAD
 DUBOIS, PA 15801

Amount Paid \$		
Official Invoice	Date	Page
3395-00002-0003	7/25/2004	1

DETACH AND RETURN WITH PAYMENT

3395-00002-0003 O 7/25/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description: 4PM NEWS

Salesperson: Correll, Mel

Date	Day	Length	Item Description	Qty	Rate	Total
7/25/2004	Sun		Sunny 106 W4 PM News Sponsorship		434.00	434.00
Copy Name: 4905						
6/28/2004	Mon	1:00	Advertising Sunny 106 W 4:01:00 PM	1	0.00	0.00
6/29/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
6/30/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/1/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/2/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/5/2004	Mon	1:00	Sunny 106 W 7:01:30 AM	1	0.00	0.00
7/6/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/7/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/8/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/9/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/12/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/13/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/14/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/15/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/16/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/19/2004	Mon	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/20/2004	Tue	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/21/2004	Wed	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/22/2004	Thu	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00
7/23/2004	Fri	1:00	Sunny 106 W 4:01:00 PM	1	0.00	0.00

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	20	Total	434.00
Total Due			434.00

INVOICE

Exh J, 3

Priority Communications
Sunny 106 WDSN & News-Talk 1420 WCED
51 West Long Avenue

Statement Date

07/25/04

DuBois, PA 15801

Charges or Payments received after this date will appear on next
Terms:

A/R Cash - WDSN-FM

WINERY AT WILCOX
MUFFERTS RUN ROAD
WILCOX, PA 15870

Date	Ref	Description	Amount
4/25/2004	ADJ-302	Invoice April 2004 DARTS	395.00
7/1/2004	101652-1	Payment, Thank You	-395.00
5/30/2004	ADJ-510	Invoice May 2004 DARTS	510.00
5/30/2004	ADJ-511	Invoice May 2004 DARTS	5.93
6/27/2004	3354-00002-0002	Invoice: Partnership	395.00
6/27/2004	F/C-6-2004	June 2004 Finance Charge	13.66
7/25/2004	3354-00002-0003	Invoice: Partnership	395.00
7/25/2004	3354-00005-0000	Invoice	771.56

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Jul	Jun	May	Apr +	Please Pay This Amount
1,166.56	408.66	515.93	0.00	2,091.15

Exh J.4

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

WINERY AT WILCOX

Amount Paid \$		
3354-00005-0000	7/25/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

WINERY AT WILCOX
 MUFFERTS RUN ROAD
 WILCOX, PA 15870

3354-00005-0000 O 7/25/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description:

Salesperson: Correll, Mel

Date	Day	Length								Qty	Rate	Total
7/25/2004	Sun		Sunny 106 W								771.56	771.56
				Copy Name: 6164								
7/10/2004	Sat	1:00	Advertising	Sunny 106 W	6:34:00 AM	8:16:00 AM	9:35:30 AM	11:35:30 AM	1:33:00 PM	8	0.00	0.00
					3:15:30 PM	7:19:30 PM	9:49:00 PM					
7/11/2004	Sun	1:00		Sunny 106 W	6:18:30 AM	7:33:00 AM	9:16:30 AM	10:34:30 AM	11:33:00 AM	8	0.00	0.00
					12:33:00 PM	9:22:30 PM	10:21:30 PM					
7/17/2004	Sat	1:00		Sunny 106 W	7:46:00 AM	9:34:00 AM	11:47:00 AM	2:47:00 PM	3:47:00 PM	8	0.00	0.00
					5:50:00 PM	7:49:00 PM	10:49:00 PM					
7/18/2004	Sun	1:00		Sunny 106 W	7:17:00 AM	8:18:00 AM	11:16:00 AM	1:34:00 PM	4:49:00 PM	8	0.00	0.00
					7:18:00 PM	8:49:00 PM	10:21:00 PM					
7/24/2004	Sat	1:00		Sunny 106 W	7:47:00 AM	9:34:00 AM	12:15:00 PM	1:33:00 PM	2:34:00 PM	8	0.00	0.00
					3:34:00 PM	9:00:00 PM	11:22:00 PM					
7/25/2004	Sun	1:00		Sunny 106 W	6:00:00 AM	7:48:00 AM	8:48:00 AM	10:15:00 AM	12:47:00 PM	8	0.00	0.00
					6:49:00 PM	10:00:00 PM	11:01:00 PM					

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	48	Total	771.56
Total Due			771.56

Exh 5,5

INVOICE

Please Remit To
Priority Communications
 Sunny 106 WDSN & News-Talk 1420 WCED
 51 West Long Avenue
 DuBois, PA 15801
 (814) 375-5260

VINERY AT WILCOX

Amount Paid \$		
3354-00002-0003	7/25/2004	1
Official Invoice	Date	Page

DETACH AND RETURN WITH PAYMENT

WINERY AT WILCOX
 MUFFERTS RUN ROAD
 WILCOX, PA 15870

3354-00002-0003 O 7/25/2004 1

Purchase Order Number:

Co-Op: <<None>>

Description: Partnership

Salesperson: Correll, Mel

Date	Day	Length		Qty	Rate	Total
7/25/2004	Sun		Sunny 106 WPartnership		395.00	395.00

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

THANK YOU FOR CHOOSING SUNNY 106 WDSN AND NEWS-TALK 1420 WCED. WE APPRECIATE YOUR BUSINESS.

Quantity	0	Total	395.00
Total Due			395.00

Exh J.6

INVOICE

WRK Technologies, Inc.**Invoice**

112 Mc Cracken Run Rd
Du Bois, PA 15801

DATE	INVOICE #
4/16/2004	D11657

BILL TO

Priority Communications, Inc.
Attn: Accounts Payable
51 West Long Ave.
Du Bois, PA 15801

SHIP TO

Priority Communications, Inc.
51 W. Long Ave
Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL INSTRUCTIONS			
	4/16/2004						
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT		
	Net 10	4/16/2004	WRKJR				
ITEM	QTY	DESCRIPTION				EACH	AMOUNT
2286819133	2	Belkin 109 key Classic Keyboard PS/2 & AT - Black (F8E206-BLK)				19.95	39.90

Please remit to above address.	Subtotal	\$39.90
	Sales Tax (6.0%)	\$2.39
	Invoice Total	\$42.29
Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.	Payments/Credits	\$0.00
	Balance Due	\$42.29

Exh L

WRK Technologies, Inc.

112 Mc Cracken Run Rd
Du Bois, PA 15801

Invoice

DATE	INVOICE #
11/9/2004	D12124

BILL TO
Priority Communications, Inc. Attn: Accounts Payable 51 West Long Ave. Du Bois, PA 15801

SHIP TO
Priority Communications, Inc. 51 W. Long Ave Du Bois, PA 15801

Account #	SHIP DATE	SHIP VIA	FOB	SPECIAL INSTRUCTIONS		
	11/9/2004					
P.O. NO.	TERMS	DUE DATE	REP	CONTRACT ID	PROJECT	
	Net 10	11/9/2004	WRKJR			
ITEM	QTY	DESCRIPTION			EACH	AMOUNT
2458012163	1	Cables Unlimited / Dynatron Skt A CPU Fan for Athlon XP3000+, copper core (FAN-AMD-PLUS2)			29.95	29.95

Please remit to above address.

Subtotal	\$29.95
Sales Tax (6.0%)	\$1.80
Invoice Total	\$31.75
Payments/Credits	\$0.00
Balance Due	\$31.75

Thank you for choosing the WRK Technologies team for your computer, networking and support needs. We may be contacted at the address listed above, or via phone at (814) 375-9130 or Toll Free at (888) 975-2727.

Exh M

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

PRIORITY COMMUNICATIONS, INC.,
Plaintiff

vs.

WRK TECHNOLOGIES, INC.,
Defendant

No. 2005-969 C.D.

S FILED *EW*

MAR 30 2009

09:30 AM

William A. Shaw
Prothonotary/Clerk of Courts

Type of Pleading: Praeclipe to Discontinue

Filed on behalf of: Priority
Communications, Inc., Plaintiff

Counsel of Record for this party:

HOPKINS HELTZEL LLP

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

LEA ANN HELTZEL, ESQUIRE
Attorney at Law
Supreme Court No. 83998

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

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

PRIORITY COMMUNICATIONS, INC., :
Plaintiff :
: vs. : No. 2005-969 C.D.
: :
WRK TECHNOLOGIES, INC., :
Defendant :
:

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above captioned civil action settled and discontinued.

HOPKINS HELTZEL LLP

BY:


David J. Hopkins, Esquire