

05-1129-CD  
Sharyn Whiteman et al vs. Richard Doyle

## Civil Other

Date		Judge
8/3/2005	New Case Filed.	No Judge
	✓ Filing: Praeipe for Writ of Summons. Paid by: Cherry, Toni M. (attorney for Whiteman, Sharyn K.) Receipt number: 1905973 Dated: 08/03/2005 Amount: \$85.00 (Check) 1CC & Writ to shff.	No Judge
8/25/2005	✓ Praeipe For Entry of Appearance, filed on behalf of Defendant, by s/ Matthew B. Taladay, Esquire. No CC	No Judge
	✓ Praeipe For Rule to File Complaint, filed by s/ Matthew B. Taladay, Esquire. No CC, Rule issued to Atty Taladay	No Judge
9/13/2005	✓ Certificate of Service, filed. That on the 12th day of September 2005, a Court certified copy of Rule to File Complaint was sent to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq. No CC.	No Judge
10/7/2005	✓ Complaint, filed by s/ Toni M. Cherry Esq. 4CC Atty T. Cherry	No Judge
11/28/2005	✓ Notice of Service, filed. That I propounded the Plaintiffs, this 23rd day of November, 2005, Defendant's FIRST SET OF DISCOVERY MATERIALS to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq. No CC.	No Judge
	✓ Answer and New Matter filed by Matthew B. Taladay Esq. No CC.	No Judge
12/19/2005	✓ Sheriff Return, August 10, 2005 at 10:51 am served the within Summons on Richard J. Doyle III. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm Shff Hawkins costs pd by Gleason \$38.09	No Judge
1/31/2006	✓ Motion to Compel Discovery, filed by s/ Matthew B. Taladay Esq. 1CC Atty Taladay.	No Judge
2/2/2006	✓ Order, NOW, this 1st day of Feb., 2006, upon consideration of Def.'s Motion to Compel, Plff. is ordered to provide full and complete responses within 30 days of the date of this Order. Upon failure of which, Plff. may be subject to sanctions by further Order of this Court. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Atty. Taladay	Fredric Joseph Ammerman
2/8/2006	✓ Certificate of Service, filed. That on the 7th day of February, 2006, a Court certified copy of Motion to Compel Discovery and Order of Court dated February 1, 2006 was sent to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq. No CC.	No Judge
3/6/2006	✓ Certificate of Service, filed. That on this 1st day of March, 2006 an original of Plaintiffs' Sharyn K. Whiteman and George T. Whiteman, answers to Defendant's Interrogatories and Request for Production of Documents-First Set, were sent to Matthew B. Taladay Esq., filed by s/ Toni M. Cherry, Esq. No CC.	No Judge
	✓ Certificate of Service, filed. That on this 2nd day of March 2006, an original of Plaintiffs' Joseph A. Reitz and Sherri L. Reitz, as parents and natural guardians of Stephani M. Reitz, an minor, Answers to Defendant's Interrogatories and Request for Production of Documents-First Set were sent to Matthew B. Taladay Esq., filed by s/ Toni M. Cherry Esq. No CC.	No Judge
3/7/2006	✓ Praeipe To Withdraw Motion to Compel Discovery, filed by s/ Matthew B. Taladay, Esquire. No CC	No Judge
3/15/2006	✓ Notice of Service, filed. This 14th day of March, 2006, Defendant's Second Set of Discovery Materials to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq. NO CC.	No Judge

## Civil Other

Date		Judge
3/22/2006	✓ Certificate of Service, filed. That on the 21st day of March 2006, three original Notice of Deposition, copies of which are attached hereto to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq. No CC.	No Judge
5/15/2006	✓ Notice of Service, filed. This 12th day of May 2006, Defendant's Second Supplemental Set of Discovery Materials to Toni M. Cherry Esq., filed by s/ Matthew B. Taladay Esq.	No Judge
11/17/2006	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Matthew B. Taladay Esq. NO CC.	No Judge
11/29/2006	✓ Praecipe to List For Trial, filed by s/ Matthew B. Taladay, Esquire. No CC	No Judge
11/30/2006	✓ Certificate of Readiness for Jury Trial, filed by s/ Matthew B. Taladay, Esquire. No CC, copy to C/A	No Judge
12/21/2006	✓ Request for Admissions, filed by s/ Matthew B. Taladay Esq. No CC.	No Judge
1/3/2007	✓ Order AND NOW, this 2nd day January 2007, it is the ORDER of this Court that the Pre-Trial Conference in the above matter shall be held on the 24th day of January 2007 at 2:30 p.m. in Chambers. BY THE COURT: /s/ Fredric J. Ammerman, P. Judge. 1CC Attys: T. Cherry and Taladay.	Fredric Joseph Ammerman
1/26/2007	✓ Order, NOW, this 24th day of Jan., 2007, following Pre-Trial Conference, Jury Selection will be held on Feb. 1, 2007 at 9:00 a.m. in Courtroom 1. Jury Trial is scheduled for May 15 and May 16, 2007 at 9:00 a.m. in Courtroom 1. (see original). By the Court, /s/ Fredric J. Ammerman, Pres. Judge. 2CC Attys: T. Cherry, Taladay	Fredric Joseph Ammerman
2/20/2007	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Matthew B. Taladay Esq. NO CC. (In Re: Aaron M. Peters D.C.)	Fredric Joseph Ammerman
	✓ Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Matthew B. Taladay Esq. No CC. (In Re: Gateway Area Medical Associates Inc.)	Fredric Joseph Ammerman

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights :  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :

No. 05 - 1129 C.D.

vs. :

RICHARD J. DOYLE, III, :  
Defendant :

**PRAECIPE FOR WRIT OF SUMMONS**

TO WILLIAM A. SHAW, PROTHONOTARY

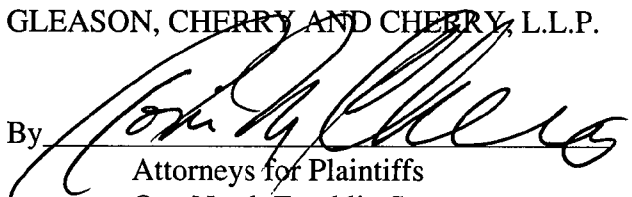
Sir:

Please enter our appearance on behalf of Plaintiffs, SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN; STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents and natural guardians and JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and as parents and natural guardians of STEPHANI M. REITZ, a  
minor, and issue a Writ of Summons in the above-captioned action against Defendant,  
RICHARD J. DOYLE, III, whose last known address is R. R. #1, Box 350, Hatten Road,  
Grampian, Pennsylvania 16838.

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By




Attorneys for Plaintiffs  
One North Franklin Street  
P. O. Box 505  
DuBois, PA 15801  
Supreme Court No.: 30205

Date: August 3, 2005

10091 writ  
to shff  
AUG 03 2005  
Att'y pd. 85.00  
Prothonotary Clerk of Courts

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

 **COPY**

**SUMMONS**

**Sharyn K. Whiteman and George T. Whiteman;  
Stephani M. Reitz, a minor, by Joseph A. Reitz and  
Sherri L. Reitz, her parents and natural guardians and  
Joseph A. Reitz and Sherri L. Reitz, in their own rights  
and as parents and natural guardians of Stephani M.  
Reitz, a minor**

**Vs.**

**NO.: 2005-01129-CD**

**Richard J. Doyle III**

**TO: RICHARD J. DOYLE III**

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 08/03/2005

---

William A. Shaw  
Prothonotary

Issuing Attorney:

Toni M. Cherry  
P. O. Box 505  
DuBois, PA 15801

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: August 24, 2005

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Praecipe for Entry  
of Appearance

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED <sup>NO CC</sup>  
m110:348/6w  
AUG 25 2005

William A. Snow  
Prothonotary/Clerk of Courts

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

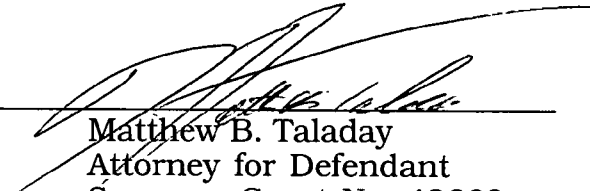
SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**PRAECIPE FOR ENTRY OF APPEARANCE**

TO THE PROTHONOTARY:

Kindly enter my appearance for the Defendant, Richard J.  
Doyle, III, in the above captioned matter.

Dated: 08-24-05

  
Matthew B. Taladay  
Attorney for Defendant  
Supreme Court No. 49663  
498 Jeffers Street  
P. O. Box 487  
DuBois, PA 15801  
(814) 371-7768

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 24th day of August, 2005, a true and correct copy of the foregoing Praecipe for Entry of Appearance was sent via first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay  
Attorney for Defendant



IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: August 24, 2005

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Praecipe for Rule to  
File Complaint

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED <sup>CP</sup>  
M110:3461 NO CC  
AUG 25 2005 Rule issued to  
William A. Shaw Amy Taladay  
Prothonotary/Clerk of Courts

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**PRAECIPE FOR RULE TO FILE COMPLAINT**

TO THE PROTHONOTARY:

Please enter a rule upon Plaintiffs to file a Complaint  
within twenty (20) days of service thereof or suffer the entry of a  
judgment of non pros.

Dated: August 24, 2005

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

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

 COPY

Sharyn K. Whiteman and George T. Whiteman;  
Stephani M. Reitz, a minor, by Joseph A. Reitz  
and Sherri L. Reitz, her parents and natural guardians and  
Joseph A. Reitz and Sherri L. Reitz in their  
own rights and as parents and natural guardians  
of Stephani M. Reitz, a minor

Vs.  
Richard J. Doyle III

Case No. 2005-01129-CD

RULE TO FILE COMPLAINT

TO: PLAINTIFFS

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

---

William A. Shaw, Prothonotary

Dated: August 25, 2005

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and ,  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: September 12, 2005

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Certificate of  
Service

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

SEP 13 2005  
W. A. Shaw  
Prothonotary Clerk of Courts  
no C/C (5)

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 12th day of September, 2005, a Court  
certified copy of Rule to File Complaint was sent via first class mail,  
postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE T. WHITEMAN; STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ and SHERRI L. REITZ, her parents and natural guardians and JOSEPH A. REITZ and SHERRI L. REITZ, in their own rights and as parents and natural guardians of STEPHANI M. REITZ, a minor,  
Plaintiffs  
vs.  
RICHARD J. DOYLE, III,  
Defendant

: No. 05 - 1129 C.D.  
:  
: Type of Case: CIVIL  
:  
: Type of Pleading: COMPLAINT  
:  
: Filed on Behalf of: SHARYN K. WHITEMAN  
: and GEORGE T. WHITEMAN; STEPHANI  
: M. REITZ, a minor, by JOSEPH A. REITZ  
: and SHERRI L. REITZ, her parents and  
: natural guardians and JOSEPH A. REITZ and  
: SHERRI L. REITZ, in their own rights and as  
: parents and natural guardians of STEPHANI  
: M. REITZ, a minor, Plaintiffs  
:  
: Counsel of Record for these Parties:  
:  
: TONI M. CHERRY, ESQ.  
: Supreme Court No.: 30205  
:  
: GLEASON, CHERRY AND  
: CHERRY, L.L.P.  
: Attorneys at Law  
: P. O. Box 505  
: One North Franklin Street  
: DuBois, PA 15801  
:  
: (814) 371-5800

FILED  
019:8201  
OCT 07 2005  
William A. Shaw  
Prothonotary/Clerk of Courts  
T. Cherry

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights : No. 05 - 1129 C.D.  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs. :  
RICHARD J. DOYLE, III, :  
Defendant :

**NOTICE**

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Notice and Complaint 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 claims 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, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR  
Clearfield County Courthouse  
Clearfield, PA 16830  
(814) 765-2641 (Ext. 88-89)

GLEASON, CHERRY AND CHERRY, L.L.P.

By

  
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights : No. 05 - 1129 C.D.  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs. :  
RICHARD J. DOYLE, III, :  
Defendant :

**COMPLAINT**

AND NOW, come SHARYN K. WHITEMAN and GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ and SHERRI L. REITZ, her parents  
and natural guardians and JOSEPH A. REITZ and SHERRI L. REITZ, in their own rights  
and as parents and natural guardians of STEPHANI M. REITZ, a minor, Plaintiffs, by their  
attorneys, GLEASON CHERRY AND CHERRY, L.L.P., and bring this action against  
RICHARD J. DOYLE, III, Defendant, to recover damages upon causes of action whereof the  
following are statements:

**COUNT I**

**Sharyn K. Whiteman Wife Plaintiff, vs. Richard J. Doyle, III, Defendant**

1. Plaintiffs, SHARYN K. WHITEMAN and GEORGE T. WHITEMAN, are adult  
individuals, wife and husband, and reside with each other at 118 Simmons Street, DuBois,  
Clearfield County, Pennsylvania 15801.



2. Plaintiff, STEPHANI M. REITZ, is a minor child, born on September 13, 1988, whose resides with her natural parents, JOSEPH A. REITZ and SHERRI L. REITZ, at 4231 West Liberty Road, DuBois, Clearfield County, Pennsylvania 15801.

3. Plaintiffs, JOSEPH A. REITZ and SHERRI L. REITZ, are adult individuals, husband and wife, and are the parents and natural guardians of STEPHANI M. REITZ, their minor child, and they reside with each other and said minor child at 4231 West Liberty Road, DuBois, Clearfield County, Pennsylvania 15801.

4. The Defendant, RICHARD J. DOYLE, III, is an adult individual, whose last known address is R. R. #1, Box 350, Hatten Road, Grampian, Clearfield County, Pennsylvania 16838.

5. The events hereinafter complained of occurred on or about August 6, 2003, at approximately 5:11 p.m. in the Township of Sandy, Clearfield County, Pennsylvania.

6. On that date, SHARYN K. WHITEMAN and GEORGE T. WHITEMAN were the owners of a 1999 Chrysler Concorde, Vehicle Identification No. 2C3HD46R1XH550371, which was then and there being operated by Plaintiff, SHARYN K. WHITEMAN, on Pennsylvania State Route 219 in a southerly direction in the Township of Sandy, Clearfield County, Pennsylvania.

7. At the date, time and place aforesaid, Defendant, RICHARD J. DOYLE, III, was the driver of a red 1993 Ford pick-up truck, Vehicle Identification No. 1FTEF14Y4PNA75548, License Plate No. YHF3061, owned by L. P. Johnson, which he was then and there operating in a southerly direction along Pennsylvania State Route 219 in Sandy Township, Clearfield County, Pennsylvania.

8. That State Route 219 as it exists at a point where it intersects with old State Route 219 is a two-lane public highway extending in a generally northerly and southerly direction.

9. That on the date above-mentioned, minor Plaintiff, STEPHANI M. REITZ, was riding as a passenger in the car being then and there driven by Plaintiff, SHARYN K. WHITEMAN, and was wearing a seat belt.

10. That at the date, time and place above-stated, Plaintiff, SHARYN K. WHITEMAN, had stopped her vehicle at the point where State Route 219 intersects with old State Route 219 and was waiting, with her left turn signal on, to make a left-hand turn onto old State Route 219, otherwise known as Barnoff's Road.

11. That at the date, time and place above-stated, Defendant, RICHARD J. DOYLE, III, so negligently and unlawfully operated the 1993 Ford pick-up truck that, as a direct result thereof, he was unable to bring his vehicle to a stop in time to avoid colliding with the vehicle being then and there operated by SHARYN K. WHITEMAN, causing the Plaintiffs, SHARYN K. WHITEMAN and STEPHANI M. REITZ, to be thrown violently in and about their vehicle and to sustain damages and serious injuries which are hereinafter more fully set forth.

12. The injuries and damages hereinafter set forth were caused by and were the direct and proximate result of the negligence of the Defendant, RICHARD J. DOYLE, III, as aforesaid, generally and in the following particulars:

(a) In operating his 1993 Ford pick-up into and against the rear of the Whiteman vehicle while the Whiteman vehicle was in its proper lane of traffic, waiting for on-coming traffic to pass so that Plaintiff Whiteman could make a left-hand turn;

(b) In failing to sound a horn, signal or other warning device;

(c) In operating said Ford pick-up vehicle at a rate of speed which was excessive under the circumstances;

(d) In failing to have proper and adequate brakes in said Ford pick-up so as to permit the said RICHARD J. DOYLE III, to stop before the collision;

(e) In failing to stop his truck before striking the rear of the Whiteman vehicle;

(f) In failing to take evasive action when he realized that he could not stop his vehicle in time to avoid the collision;

(g) In failing to maintain the proper lookout while the truck was moving forward on the highway;

(h) In failing to have said Ford pick-up truck under proper and adequate control so that he could have steered it to another location so as to avoid colliding with the rear of Plaintiff Whiteman's vehicle;

(i) In operating said Ford pick-up truck at such a speed that it could not be stopped within the range of vision of the said RICHARD J. DOYLE, III;

(j) In failing to observe the automobile being operated by SHARYN K. WHITEMAN in time to avoid a collision; and

(k) In using his cellular phone while he was operating his vehicle so that he was distracted and unable to devote his full attention to his driving and to the road ahead where Plaintiff's vehicle was stopped.

13. At the time the injuries herein alleged were sustained by Plaintiff, SHARYN K. WHITEMAN, and the minor Plaintiff, STEPHANI M. REITZ, the Plaintiff, SHARYN K. WHITEMAN, was free from all fault and blame as her vehicle was lawfully stopped with its

left turn signal flashing and the injuries of SHARYN K. WHITEMAN and STEPHANI M. REITZ, were the result solely of the acts of negligence of Defendant, RICHARD J. DOYLE, III, as herein set forth.

14. At the time the injuries of the said SHARYN K. WHITEMAN and STEPHANI M. REITZ were sustained, the said minor Plaintiff, STEPHANI M. REITZ, was free from all fault and blame as a passenger in the vehicle driven by SHARYN K. WHITEMAN and her injuries were the result solely of the acts of negligence of Defendant as herein set forth.

15. By reason of the negligence of the Defendant, RICHARD J. DOYLE, III, the Plaintiff, SHARYN K. WHITEMAN, sustained trauma to her head, severe injury to her cervical, thoracic and lumbar spines; trauma to her wrists and arms and severe pain to her hands, wrists, head, neck, shoulders and back and recurring headaches.

16. By reason of said injuries, she was rendered, sick, sore, lame and prostrate and disordered for which she is still receiving treatment and for which she will continue to receive treatment for some time in the future.

17. As a result of said injuries, Plaintiff, SHARYN K. WHITEMAN, has suffered, and will continue to suffer an impairment of earning capacity and an inability to lead a normal social life.

18. As a result of said injuries, Plaintiff, SHARYN K. WHITEMAN, has suffered and will continue to suffer physical anguish and pain and suffering and inconvenience in the future.

19. As a result of said injuries, Plaintiff, SHARYN K. WHITEMAN, has suffered shock to the nerves and nervous system and has suffered mental anguish and emotional distress and will continue to so suffer for an indefinite time in the future.

20. As a result of said injuries, the said Plaintiff, SHARYN K. WHITEMAN, has been and will be deprived in the future of the ordinary pleasures of life.

21. As a result of said accident and the negligence of RICHARD J. DOYLE, III, the said Plaintiff, SHARYN K. WHITEMAN, has suffered serious injuries which are permanent in nature.

WHEREFORE, Plaintiff, SHARYN K. WHITEMAN, claims damages against Defendant, RICHARD J. DOYLE, III, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

## **COUNT II**

**GEORGE T. WHITEMAN, Husband Plaintiff,  
vs. RICHARD J. DOYLE, III, Defendant**

22. The Plaintiff, GEORGE T. WHITEMAN, avers that he is the husband of SHARYN K. WHITEMAN, Wife Plaintiff.

23. Plaintiff, GEORGE T. WHITEMAN, incorporates herein by reference the averments contained in Paragraphs 1 through 21 inclusive of Count I of this Complaint as if the same had been set forth at length herein.

24. As a result of the negligence of Defendant, RICHARD J. DOYLE, III, as hereinbefore alleged, GEORGE T. WHITEMAN, as husband of the said SHARYN K. WHITEMAN, has been and may and probably will in the future be, obliged to expend large and various sums of money for medicine and medical attention in and about endeavoring to treat and cure his said wife of her injuries.

25. By reason of the aforesaid, he has been, and may and probably will in the future be, deprived of the assistance and society of his said wife, all of which has been and probably will be to his great financial damage and loss.

26. By reason of the aforesaid, GEORGE T. WHITEMAN, has suffered various out-of-pocket losses for damage to personal property and for expenses necessitated by his wife's injuries, to his damage and loss.

WHEREFORE, Plaintiff, GEORGE T. WHITEMAN, claims damages from the Defendant, RICHARD J. DOYLE, III, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

### COUNT III

**Stephani M. Reitz, a minor, by Joseph A Reitz and Sherri L. Reitz, her parents and natural guardians vs. Richard J. Doyle, III**

27. Plaintiff, STEPHANI M. REITZ, by her parents and natural guardians, JOSEPH A. REITZ and SHERRI L. REITZ, incorporate herein by reference the averments contained in Paragraphs 1 through 14 inclusive of Count I of this Complaint as if the same had been set forth at length herein.

28. That at the date, time and place above-stated, the minor Plaintiff, STEPHANI M. REITZ, was riding as a passenger in the car being then and then driven by Plaintiff, SHARYN K. WHITEMAN, and was wearing a seat belt and was free from all fault and blame for said accident and her injuries were the result solely of the acts of negligence of Defendant, RICHARD J. DOYLE, III, as herein set forth.

29. By reason of the negligence of the Defendant, the minor Plaintiff sustained contusions, trauma and sprain to her cervical, thoracic and lumbar spine and trauma to her head resulting in headaches.

30. By reason of the aforesaid injuries, she was rendered sick, sore, lame and prostrate and disordered for which she had to receive treatment and for which she is still receiving treatment and for which she will continue to receive treatment for some time in the future.

31. As a result of said injuries, the minor Plaintiff has suffered and will continue to suffer physical anguish and pain and suffering and inconvenience in the future.

32. As a result of said injuries, the minor Plaintiff has suffered shock to her nerves and nervous system and has suffered mental anguish and emotional distress and may continue to so suffer for an indefinite time in the future.

33. As a result of said injuries, the minor Plaintiff has been and will be deprived in the future of the ordinary pleasures of life.

34. As a direct result of the negligence of the Defendant, the minor Plaintiff suffered great pain and agony and has been and probably will in the future be hindered and prevented from attending to her usual and daily duties, and will suffer a loss of earning power in the future, to her great damage and loss.

WHEREFORE, STEPHANI M. REITZ, by her parents and natural guardians, JOSEPH A. REITZ and SHERRI L. REITZ, claim damages of the Defendant, RICHARD J. DOYLE, III, on behalf of the minor child, STEPHANI M. REITZ, in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) together with delay damages and costs of suit.

#### COUNT IV

**Joseph A Reitz and Sherri L. Reitz, parents of Stephani M. Reitz  
vs. Richard J. Doyle, III, Defendant**

35. Plaintiffs, JOSEPH A. REITZ and SHERRI L. REITZ, incorporate herein by reference the averments contained in Paragraphs 1 through 14 inclusive of Count I and Paragraphs 27 through 34 inclusive of Count III of this Complaint as if the same had been set forth at length herein.

36. Solely because of the negligence of Defendant, RICHARD J. DOYLE, III, as hereinbefore alleged, JOSEPH A. REITZ and SHERRI L. REITZ, as parents and natural guardians of the minor Plaintiff, STEPHANI M. REITZ, have been, and probably will in the future be, obliged to expend large and various sums of money for medicine and medical attention in and about endeavoring to treat and cure said minor child of the injuries sustained as aforesaid.

37. Solely because of the negligence of Defendant, RICHARD J. DOYLE, III, as hereinbefore alleged, JOSEPH A. REITZ and SHERRI L. REITZ, as parents and natural guardians of the minor Plaintiff, STEPHANI M. REITZ, have been, and probably will in the future lose wages and income because of the time they have had to take off from work in seeking treatment for their minor child.

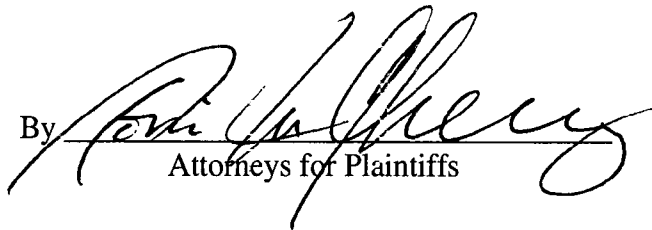
38. By reason of their minor child's injuries, the earnings of the said minor child will be impaired during the age of her minority, to which earnings Plaintiffs, JOSEPH A. REITZ and SHERRI L. REITZ, are legally entitled, all of which have been and probably will be to their great financial damage and loss.



WHEREFORE, the Plaintiffs, JOSEPH A. REITZ and SHERRI L. REITZ, claim damages from the Defendant, RICHARD J. DOYLE, III, in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with delay damages and costs of suit.

Respectfully submitted,

GLEASON, CHERRY AND CHERRY, L.L.P.

By   
Attorneys for Plaintiffs

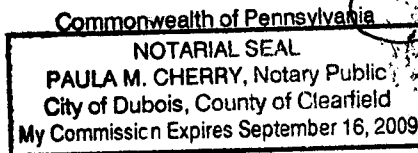
COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

Personally appeared before me, a Notary Public in and for the County and State aforesaid, SHARYN K. WHITEMAN who acknowledges that she is one of the Plaintiffs named in the foregoing Complaint and that she is authorized to make this Affidavit on behalf of herself and her husband, GEORGE T. WHITEMAN, and who, being duly sworn according to law, deposes and says that the facts set forth in Counts I and II of the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

*Sharyn K. Whiteman*  
Sharyn K. Whiteman

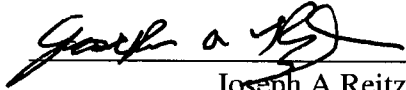
Sworn to and subscribed before me this 6<sup>th</sup> day of October, 2005.

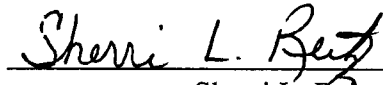
*Paula M. Cherry*



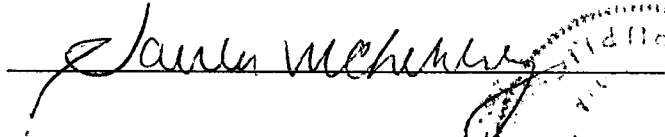
COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

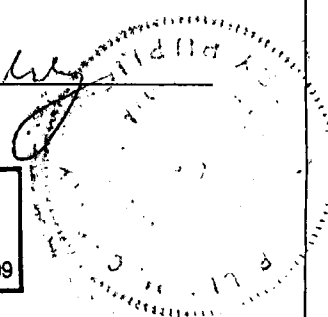
Personally appeared before me, a Notary Public in and for the County and State aforesaid, JOSEPH A. REITZ and SHERRI L. REITZ, who, being duly sworn according to law, depose and say that they are two of the Plaintiffs in the above matter; that they are the natural parents and guardians of STEPHANI M. REITZ; that they are duly authorized to make this Affidavit on behalf of themselves and the minor Plaintiff, STEPHANI M. REITZ; that the facts set forth in Counts III and IV of the foregoing Complaint are true and correct, partly upon their personal knowledge and the remainder upon information and belief.

  
\_\_\_\_\_  
Joseph A Reitz

  
\_\_\_\_\_  
Sherri L. Reitz

Sworn to and subscribed before me this 6<sup>th</sup> day of October, 2005.

  
\_\_\_\_\_  
Commonwealth of Pennsylvania  
NOTARIAL SEAL  
PAULA M. CHERRY, Notary Public  
City of Dubois, County of Clearfield  
My Commission Expires September 16, 2009



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights : No. 05 - 1129 C.D.  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs. :  
RICHARD J. DOYLE, III, :  
Defendant :

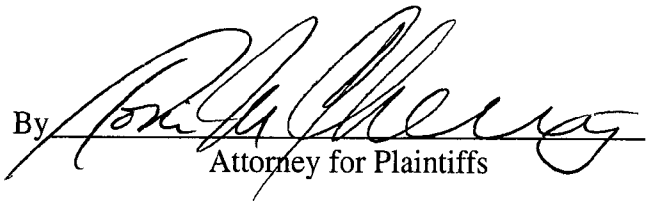
**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of October, 2005, a certified copy of the Complaint filed by Plaintiffs was served upon MATTHEW B. TALADAY, ESQ., counsel for Defendant, by mailing the same to him by United States First Class Mail, Postage Prepaid, by depositing the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

MATTHEW B. TALADAY, ESQ.  
Hanak, Guido and Taladay  
Attorneys at Law  
P. O. Box 487  
DuBois, PA 15801

GLEASON, CHERRY AND CHERRY, L.L.P.

Dated: October 7, 2005

By   
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN, ET AL.,  
Plaintiffs

vs.

RICHARD J. DOYLE, III,  
Defendant

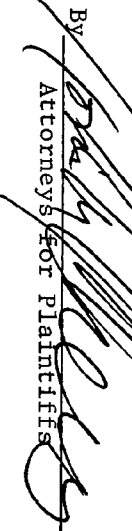
No. 05 - 1129 C.D.

C O M P L A I N T

To The Within Defendant:

YOU ARE HEREBY NOTIFIED TO  
PLEAD TO THE WITHIN COMPLAINT  
WITHIN TWENTY (20) DAYS FROM THE  
DATE OF SERVICE HEREOF.

GLEASON, CHERRY AND CHERRY, L.L.P.

By   
Attorneys for Plaintiffs

LAW OFFICES

GLEASON, CHERRY & CHERRY, L.L.P.

P.O. Box 505

Du Bois, PENNSYLVANIA 15801-0505

ONE NORTH FRANKLIN STREET

FILED

OCT 07 2005

William A. Shaw

Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and	:	Type of Case: Civil Action
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	No. 2005-01129-CD
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	Type of Pleading:
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	Notice of
REITZ, in their own rights and	:	Service
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	Filed on Behalf of:
Plaintiffs	:	
	:	Defendant
vs	:	
	:	Counsel of Record for This
RICHARD J. DOYLE, III,	:	Party:
Defendant	:	
	:	Matthew B. Taladay, Esq.
	:	Supreme Court No. 49663
	:	Hanak, Guido and Taladay
	:	498 Jeffers Street
	:	P.O. Box 487
	:	DuBois, PA 15801
	:	
Date: November 23, 2005	:	(814) 371-7768

FILED

NOV 28 2005

m/s/30/10

William A. Shaw

Prothonotary/Clerk of Courts

NO 6/1

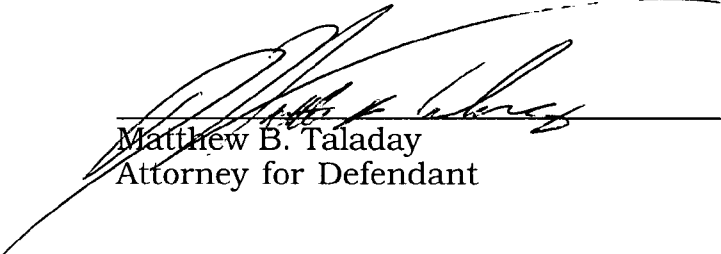
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF SERVICE**

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being  
counsel of record for Defendant, do hereby certify that I propounded  
on Plaintiffs, via United States mail, first class, postage pre-paid, this  
23<sup>rd</sup> day of November, 2006, Defendant's FIRST SET OF  
DISCOVERY MATERIALS to the below indicated person, at said  
address, being counsel of record for the Plaintiffs:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: November 23, 2005

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Answer and New  
Matter

Filed on Behalf of:

Defendant

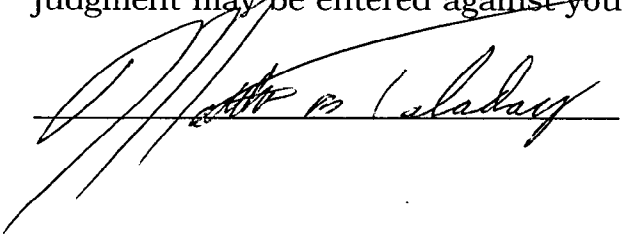
Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

JURY TRIAL IS DEMANDED

You are hereby notified to plead  
to the within pleading within twenty  
(20) days of service thereof or default  
judgment may be entered against you.



FILED

NOV 28 2005  
11:30 AM  
William A. Shaw  
Prothonotary/Clerk of Courts  
w/c/c



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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**ANSWER**

AND NOW, comes the Defendant, Richard J. Doyle, III, by his attorneys, Hanak, Guido and Taladay, and hereby responds to Plaintiffs' Complaint as follows:

**Count I**

**Sharyn K. Whiteman, Wife Plaintiff**  
**vs.**  
**Richard J. Doyle, III, Defendant**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.

8. Admitted.

9. Admitted.

10. Upon information and belief, admitted.

11. Denied as stated. It is admitted that the automobile operated by Richard J. Doyle, III did collide with the car operated by Sharyn K. Whiteman. The remaining allegations of paragraph 11 are denied and strict proof thereof is demanded at trial.

12. Defendant, Richard J. Doyle, III, admits liability for the collision. The remaining allegations of paragraph 12(a) through (k) are denied in accordance with Pa.R.C.P. Rule 1029(e).

13. It is admitted that Plaintiff Sharyn K. Whiteman shares no fault for the collision. The remaining allegations of paragraph 13 are denied in accordance with Pa.R.C.P. Rule 1029(e).

14. It is admitted that Plaintiff Stephani M. Reitz shares no blame for the collision. The remaining allegations of paragraph 14 are denied in accordance with Pa.R.C.P. Rule 1029(e).

15. - 21. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of these allegations, therefore, they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendant, Richard J. Doyle, III, demands judgment in his favor.

## **Count II**

**George T. Whiteman, Husband Plaintiff**  
**vs.**  
**Richard J. Doyle, III, Defendant**

22. Admitted.

23. Defendant incorporates by reference his responses to paragraphs 1 through 21 of Count I of the Complaint.

24. - 26. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of these allegations, therefore, they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Plaintiff requests judgment in his favor.

### **Count III**

**Stephani M. Reitz, a minor, by Joseph A. Reitz and Sherri L. Reitz,  
her parents and natural guardians, Plaintiff**

**vs.**

**Richard J. Doyle, III**

27. Defendant incorporates paragraphs 1 through 14 above as if set forth in full.

28. Defendant, Richard J. Doyle, III, admits liability for the collision and further admits that Stephani M. Reitz is not liable for the collision. With regard to the remaining allegations of paragraph 28, Defendant is, after reasonable investigation, without information sufficient to form a belief as to the truth of these averments, therefore they are denied and strict proof thereof is demanded at the time of trial.

29. - 34. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of the allegations of paragraphs 29 - 34 of the Complaint, therefore, they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, the Defendant, Richard J. Doyle, III, requests judgment in his favor.

**Count IV**

**Joseph A. Reitz and Sherri L. Reitz,  
Parents of Stephani M. Reitz, Plaintiffs  
vs.  
Richard J. Doyle, III, Defendant**

35. Defendant, Richard J. Doyle, III, incorporates his responses to the relevant paragraphs of Plaintiffs' Complaint as if set forth in full.

36. - 38. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of the allegations of paragraphs 36 - 38 of the Complaint, therefore, they are denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendant requests judgment in his favor.

**NEW MATTER**

39. Plaintiffs' claims are barred or limited by application of the Pennsylvania Motor Vehicle Financial Responsibility Law, including, but not limited to, the limited tort threshold.

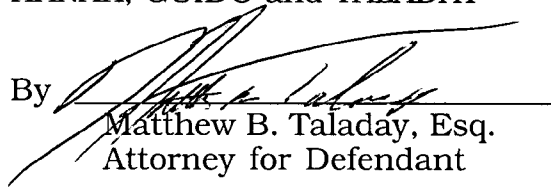
WHEREFORE, Defendant requests judgment in his favor.

A JURY TRIAL IS DEMANDED.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

**VERIFICATION**

I, **Richard J. Doyle, III**, do hereby verify that I have read the foregoing Answer and New Matter. The statements therein are correct to the best of my personal knowledge or information and belief.

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

Date: 11-17-05

  
\_\_\_\_\_  
Richard J. Doyle, III

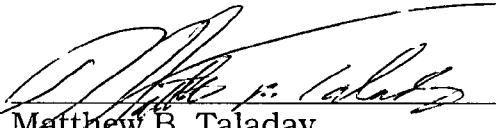
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and :  
GEORGE T. WHITEMAN; :  
STEPHANI M. REITZ, a minor, :  
by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents :  
and natural guardians and :  
JOSEPH A. REITZ and SHERRI L. :  
REITZ, in their own rights and : No. 2005-01129-CD  
as parents and natural guardians :  
of STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs :  
RICHARD J. DOYLE, III, :  
Defendant :

**CERTIFICATE OF SERVICE**

I certify that on the 23rd day of November, 2005, a true  
and correct copy of the foregoing Answer & New Matter was sent via  
first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100711  
NO: 05-1129-CD  
SERVICE # 1 OF 1  
SUMMONS

PLAINTIFF: SHARYN K. WHITEMAN and GEORGE T. WHITEMAN al  
vs.  
DEFENDANT: RICHARD J. DOYLE III

SHERIFF RETURN

NOW, August 10, 2005 AT 10:51 AM SERVED THE WITHIN SUMMONS ON RICHARD J. DOYLE, III  
DEFENDANT AT RR#1 BOX 350, HATTEN ROAD, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA, BY  
HANDING TO JAMIE DOYLE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE  
KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

012:0738  
DEC 19 2005

William A. Shaw  
Prothonotary Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	GLEASON	10317	10.00
SHERIFF HAWKINS	GLEASON	10317	28.09

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*  
*by Maury 2 Hawkins*

Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and	:	Type of Case: Civil Action
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	No. 2005-01129-CD
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	Type of Pleading:
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	Motion to
REITZ, in their own rights and	:	Compel Discovery
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	Filed on Behalf of:
Plaintiffs	:	
	:	Defendant
vs	:	
	:	Counsel of Record for This
RICHARD J. DOYLE, III,	:	Party:
Defendant	:	
	:	Matthew B. Taladay, Esq.
	:	Supreme Court No. 49663
	:	Hanak, Guido and Taladay
	:	498 Jeffers Street
	:	P.O. Box 487
	:	DuBois, PA 15801
	:	
Date: January 30, 2006	:	(814) 371-7768

**FILED** <sup>icc</sup>  
 m) 10:33:01  
 JAN 31 2006  
 William A. Shaw  
 Prothonotary/Clerk of Courts

*Any Taladay*  
*LM*



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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**MOTION TO COMPEL DISCOVERY**

AND NOW comes Defendant, Richard J. Doyle, III, by his attorneys, Hanak, Guido and Taladay and hereby petition this Honorable Court to compel discovery averring as follows:

1. On November 23, 2005 Interrogatories and Request for Production of Documents were served by Defendant upon Plaintiff. A Notice of Service was filed with the Office of Prothonotary by first class mail on that date. A copy of the Notice of Service is attached hereto as Exhibit "A".
2. To date, no responses to these discovery requests have been provided.
3. Defendant requests this Honorable Court to issue an Order compelling Counsel for Plaintiff to provide full and complete

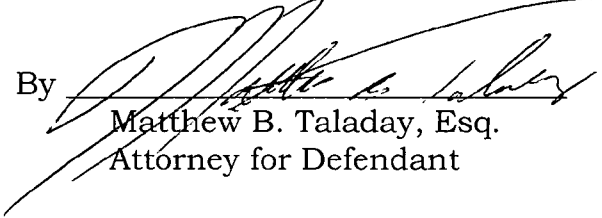
discovery responses within thirty days of the date of this Order, upon failure of which the Court may impose sanctions.

WHEREFORE, it is respectfully requested that this Motion to Compel Discovery be granted.

Respectfully submitted,

HANAK, GUIDO AND TALADAY

By



Matthew B. Taladay, Esq.  
Attorney for Defendant

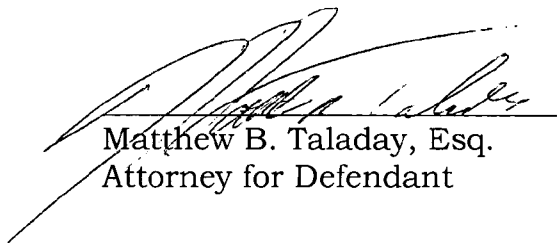
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 30th day of January, 2006, a true and correct copy of the foregoing Motion to Compel Discovery was sent via first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

CA

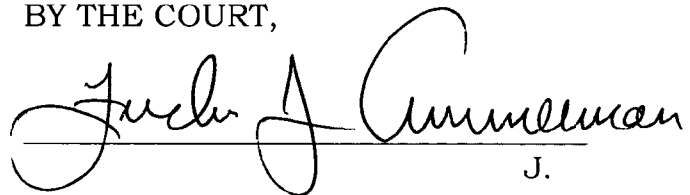
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

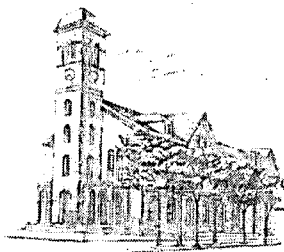
**ORDER**

AND NOW, this 15<sup>th</sup> day of February, 2006,  
upon consideration of Defendant's Motion to Compel, Plaintiff is hereby  
ordered to provide full and complete responses within thirty (30) days of  
the date of this Order. Upon failure of which, Plaintiff may be subject to  
sanctions by further Order of this Court.

BY THE COURT,

  
J.

**FILED** <sup>icc</sup>  
~~01:00 PM~~ <sup>Any Taladay</sup>  
**FEB 02 2006**  
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: 2/2/06

X 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

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: February 7, 2006

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Certificate of  
Service

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED  
m/10:30  
FEB 08 2006

William A. Shaw  
Prothonotary/Clerk of Courts

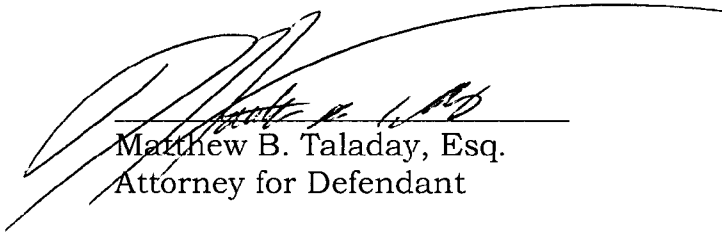
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 7th day of February, 2006, a Court certified copy of Motion to Compel Discovery and Order of Court dated February 1, 2006 was sent via first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

FILED No. CC  
0/34461  
MAR 06 2006  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights : No. 05 - 1129 C.D.  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs. :  
RICHARD J. DOYLE, III, :  
Defendant :

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of March, 2006, an original of Plaintiffs', JOSEPH A. REITZ and SHERRI L. REITZ, as parents and natural guardians of STEPHANI M. REITZ, a minor, Answers to Defendant's Interrogatories and Request for Production of Documents - First Set were sent to MATTHEW B. TALADAY, ESQ., counsel for Defendant, by mailing the same to him by United States First Class Mail, postage prepaid, by depositing in the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

MATTHEW B. TALADAY, ESQ.  
Hanak, Guido and Taladay  
Attorneys at Law  
498 Jeffers Street  
P. O. Box 487  
DuBois, PA 15801

GLEASON, CHERRY AND CHERRY, L.L.P.

By   
Attorneys for Plaintiffs.

Dated: March 2, 2006



FILED  
03:49 PM  
MAR 06 2006  
NO CC  
LM

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

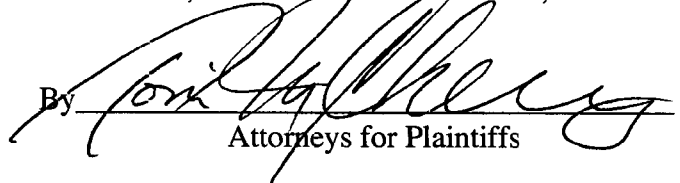
SHARYN K. WHITEMAN and GEORGE :  
T. WHITEMAN; STEPHANI M. REITZ, :  
a minor, by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents and :  
natural guardians and JOSEPH A. REITZ :  
and SHERRI L. REITZ, in their own rights : No. 05 - 1129 C.D.  
and as parents and natural guardians of :  
STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs. :  
RICHARD J. DOYLE, III, :  
Defendant :

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March, 2006, an original of Plaintiffs', SHARYN K. WHITEMAN and GEORGE T. WHITEMAN, Answers to Defendant's Interrogatories and Request for Production of Documents - First Set were sent to MATTHEW B. TALADAY, ESQ., counsel for Defendant, by mailing the same to him by United States First Class Mail, postage prepaid, by depositing in the same in the United States Post Office at DuBois, Pennsylvania, addressed as follows:

MATTHEW B. TALADAY, ESQ.  
Hanak, Guido and Taladay  
Attorneys at Law  
498 Jeffers Street  
P. O. Box 487  
DuBois, PA 15801

GLEASON, CHERRY AND CHERRY, L.L.P.

By   
Attorneys for Plaintiffs

Dated: March 1, 2006

CA

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: March 6, 2006

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Praecipe to Withdraw

Motion to Compel Discovery

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED  
MAR 10 4 46 PM '06  
MAR 07 2006  
William A. Shaw  
Prothonotary/Clerk of Courts

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

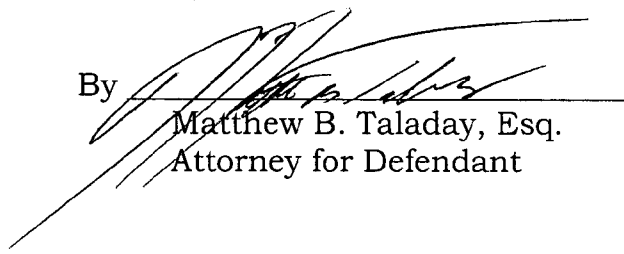
**PRAECIPE TO WITHDRAW MOTION TO COMPEL DISCOVERY**

TO THE PROTHONOTARY:

Kindly withdraw the Motion to Compel Discovery previously  
filed by the Defendant in this matter.

HANAK, GUIDO AND TALADAY

By

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

110-3004  
 MAR 15 2006  
 William A. Shaw  
 Prothonotary/Clerk of Courts

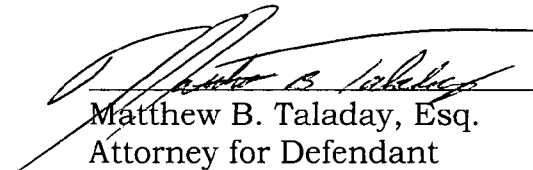
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF SERVICE**

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being counsel of record for Defendant, do hereby certify that I propounded on Plaintiffs, via United States mail, first class, postage pre-paid, this 14th day of March, 2006, Defendant's SECOND SET OF DISCOVERY MATERIALS to the below indicated person, at said address, being counsel of record for the Plaintiffs:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

RICHARD J. DOYLE, III,  
Defendant

(814) 371-7768

William A Shaw  
Notary Public/Clerk of Courts

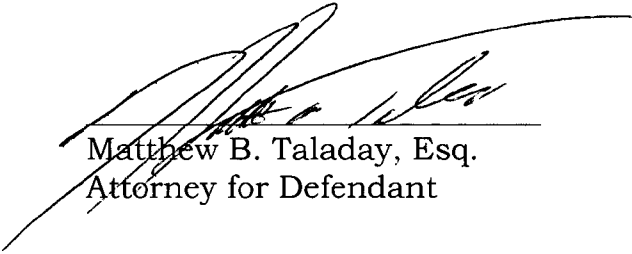
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 21st day of March, 2006, three original  
Notices of Deposition, copies of which are attached hereto, were sent via  
first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

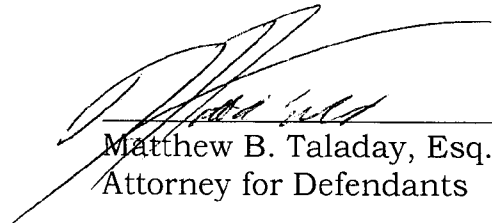
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF DEPOSITION**

TO: SHARYN K. WHITEMAN, Plaintiff  
c/o Toni M. Cherry, Esq.

TAKE NOTICE that your deposition by oral examination will be taken on **Thursday, May 4, 2006** at **10:00 a.m.** at the law office of Hanak, Guido and Taladay, 498 Jeffers Street, DuBois, Pennsylvania. This deposition is being taken for the purpose of discovery and for use at trial, pursuant to the Pennsylvania Rules of Civil Procedure regarding Discovery.

  
Matthew B. Taladay, Esq.  
Attorney for Defendants

cc: Schreiber Reporting Service



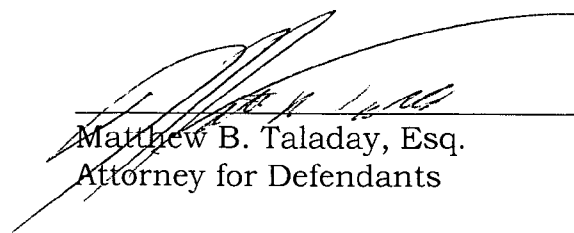
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF DEPOSITION**

TO: SHERRI L. REITZ, Plaintiff  
c/o Toni M. Cherry, Esq.

TAKE NOTICE that your deposition by oral examination will be taken on **Thursday, May 4, 2006** at **11:00 a.m.** at the law office of Hanak, Guido and Taladay, 498 Jeffers Street, DuBois, Pennsylvania. This deposition is being taken for the purpose of discovery and for use at trial, pursuant to the Pennsylvania Rules of Civil Procedure regarding Discovery.

  
Matthew B. Taladay, Esq.  
Attorney for Defendants

cc: Schreiber Reporting Service

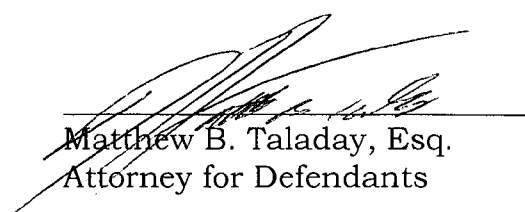
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and :  
GEORGE T. WHITEMAN; :  
STEPHANI M. REITZ, a minor, :  
by JOSEPH A. REITZ and :  
SHERRI L. REITZ, her parents :  
and natural guardians and :  
JOSEPH A. REITZ and SHERRI L. :  
REITZ, in their own rights and : No. 2005-01129-CD  
as parents and natural guardians :  
of STEPHANI M. REITZ, a minor, :  
Plaintiffs :  
vs :  
RICHARD J. DOYLE, III, :  
Defendant :

**NOTICE OF DEPOSITION**

TO: STEPHANI M. REITZ, Plaintiff  
c/o Toni M. Cherry, Esq.

TAKE NOTICE that your deposition by oral examination will  
be taken on **Thursday, May 4, 2006** at **11:00 a.m.** at the law office of  
Hanak, Guido and Taladay, 498 Jeffers Street, DuBois, Pennsylvania.  
This deposition is being taken for the purpose of discovery and for use at  
trial, pursuant to the Pennsylvania Rules of Civil Procedure regarding  
Discovery.

  
Matthew B. Taladay, Esq.  
Attorney for Defendants

cc: Schreiber Reporting Service

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: May 12, 2006

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Notice of  
Service

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED

MAY 15 2006

m/8:30/w  
William A. Shaw  
Prothonotary/Clerk of Courts

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF SERVICE**

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being counsel of record for Defendant, do hereby certify that I propounded on Plaintiffs, via United States mail, first class, postage pre-paid, this 12th day of May, 2006, Defendant's SECOND SUPPLEMENTAL SET OF DISCOVERY MATERIALS to the below indicated person, at said address, being counsel of record for the Plaintiffs:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

Matthew B. Taladay  
Matthew B. Taladay, Esq.  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Certificate Prerequisite to  
Service of Subpoena

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

Dated: November 16, 2006

**FILED** *no cc*  
*mhc/2/06*  
NOV 17 2006 *JS*

William A. Shaw  
Prothonotary/Clerk of Courts

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

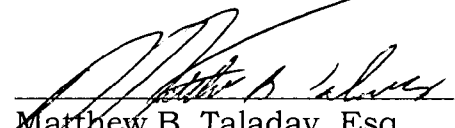
SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA  
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for the production of documents and things pursuant to Rule 4009.22, Plaintiffs certify that

1. A notice of intent to serve subpoena with a copy of subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the subpoena is sought to be served;
2. A copy of the notice, including the proposed subpoena, is attached to this certificate;
3. No objection to the subpoena has been received; and
4. The subpoena which will be served is identical to the one attached to the notice of intent to serve the subpoena.

Dated: November 16, 2006

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

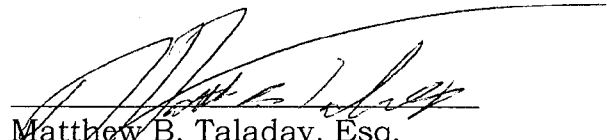
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF INTENT TO SERVE SUBPOENA  
TO PRODUCE DOCUMENTS AND THINGS  
FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant, Richard J. Doyle, III, intends to serve a subpoena identical to the one attached to this notice. You have twenty (20) days from the date listed below to file of record and serve upon the undersigned objections to the subpoena. If no objections are made, the subpoena may be served.

Date: 10-25-2006

  
Matthew B. Taladay, Esq.  
Attorney for Defendant  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801  
(814) 371-7768

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Sharyn K. Whiteman  
George T. Whiteman  
Stephani M. Reitz  
Joseph A. Reitz  
Sherri L. Reitz  
Plaintiff(s)

Vs.

Richard J. Doyle III  
Defendant(s)

\*

\*

No. 2005-01129-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO  
RULE 4009.22

TO: Kness Insurance & Financial Services, 407 S. Main St., DuBois, PA 15801  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Declaration page for automobile insurance policy issued to Joseph A.  
and Sherri L. Reitz and covering the time period inclusive of  
August 6, 2003.

(Address) 3 S. Brady Street  
PO Box 487  
DuBois PA 15801

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Matthew B. Taladay, Esq.  
ADDRESS: PO Box 487  
DuBois PA 15801  
TELEPHONE: (814) 371-7768  
SUPREME COURT ID # 49663  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

DATE: Monday, October 23, 2006  
Seal of the Court

\_\_\_\_\_  
Deputy



LA

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: November 28, 2006

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Praecipe to List  
Case for Trial

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED

NOV 29 2006

W/10:30/2  
William A. Shaw  
Prothonotary/Clerk of Courts

no C/L

611

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**PRAECIPE TO LIST CASE FOR TRIAL**

TO THE PROTHONOTARY:

Please list the above captioned case for trial. In support of this Praecipe, I, the undersigned counsel for Defendant, certify as follows:

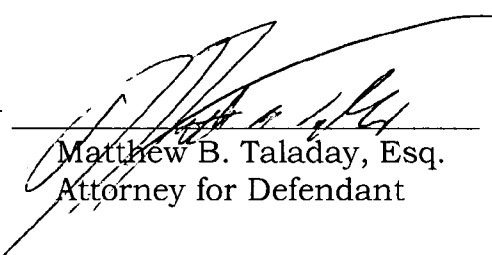
1. There are no motions outstanding, discovery has been completed and the case is ready for trial.
2. This case is to be heard by a jury.

3. Notice of intention to submit this Praecipe has been  
given to all counsel of record.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By



Matthew B. Taladay, Esq.  
Attorney for Defendant

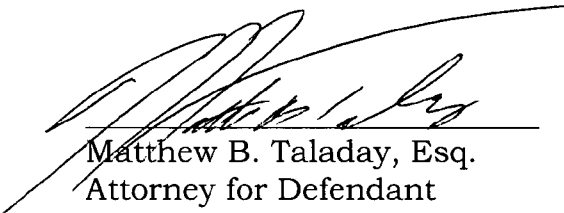
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 28th day of November, 2006, a true and correct copy of the foregoing Praecipe was sent via first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

LA

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
CIVIL TRIAL LISTING

CERTIFICATE OF READINESS

TO THE PROTHONOTARY

No. 2005-01129-CD

11/28/06

CASE NUMBER	TYPE TRIAL REQUESTED	DATE PRESENTED	ESTIMATED TRIAL TIME
-------------	----------------------	----------------	----------------------

Date Complaint Filed: ☒ Jury ☐ Non-Jury  
☐ Arbitration

2 Days

10/07/05

PLAINTIFF(S) SHARYN K. WHITEMAN and GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ and SHERRI L.  
REITZ, her parents and natural guardians

DEFENDANT(S)

RICHARD J. DOYLE, III

ADDITIONAL DEFENDANT(S)

☐

Check Block if  
a Minor is a  
Party to the  
Case

☐

JURY DEMAND FILED BY:

Defendant

DATE JURY DEMAND FILED:

11/23/06

AMOUNT AT ISSUE	CONSOLIDATION	DATE CONSOLIDATION ORDERED
-----------------	---------------	----------------------------

more than  
\$ 25,000.00 ☐ yes ☐ no

**FILED**

NOV 29 2006

William A. Shaw  
Prothonotary/Clerk of Courts

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. COPY TO C/A (GW)

FOR THE PLAINTIFF

Toni M. Cherry, Esq.

TELEPHONE NUMBER

(814) 371-5800

FOR THE DEFENDANT

Matthew B. Taladay, Esq.

TELEPHONE NUMBER

(814) 371-7768

FOR ADDITIONAL DEFENDANT

TELEPHONE NUMBER

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: December 20, 2006

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Request for  
Admissions

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED  
DEC 21 2006  
no cc

William A. Shaw  
Prothonotary/Clerk of Courts

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

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**DEFENDANT'S REQUEST FOR ADMISSIONS TO PLAINTIFFS**  
**STEPHANIE M. REITZ, JOSEPH A. REITZ and SHERRI L. REITZ**

Pursuant to Pa.R.C.P. No. 4014, Defendant, Richard J. Doyle, III, by his attorney Matthew B. Taladay, Esq., hereby requests that Plaintiffs Stephanie M. Reitz, Joseph A. Reitz and Sherri L. Reitz made the following admissions within thirty (30) days after service, for the purposes of this action only and subject to all pertinent objections as to relevancy which may be interposed at the trial of this case. Response to this request is to be served within thirty (30) days after service upon Plaintiffs' attorney.

**Instructions**

1. This request for admissions are directed to Plaintiffs Stephanie M. Reitz, Joseph A. Reitz and Sherri L. Reitz, their agents, servants, assigns, representatives, past and present, and unless privilege is claimed, each and every attorney, past and present, of each and every such individual or entity. As used herein, "Plaintiffs", "you" and "your" means the Plaintiffs to which these requests for admissions are addressed, their officers, employees, agents, servants, assigns, representatives, past and present, and each and every attorney, past and present, of each and every such individual or entity.

2. This request for admissions encompass all information, documents and records that are in the possession, control or custody of Defendant or any of its officers, employees, agents, servants, attorneys and assigns.

3. If any objections are made to any request for admission, the reasons therefore shall be stated.

4. If there is a claim of privilege relating to any request to admit, you shall set forth fully the basis for the claim of privilege, including the facts upon which you rely to support the claim of privilege in sufficient detail to permit the court to rule on the propriety of the privilege.

5. If your response to any request is not an unqualified admission, your answer shall specifically deny the matter or set forth in detail the reasons why you cannot truthfully admit or deny the matter.

6. A denial shall fairly meet the substance of the requested admission, and when good faith requires that you qualify your answer or deny only a part of the matter of which an admission is requested, you should specify so much of it as is true and qualify or deny the remainder.

7. You may not give lack of information or knowledge as a reason for failure to admit or deny, unless you state that you have made reasonable inquiry and that the information known to you or readily obtainable by you is insufficient to enable you to admit or deny.

8. This request for admissions is continuous in nature and must be supplemented promptly if Plaintiffs obtain or learn further or different information between the date of the response and the time of trial by which Plaintiffs know that a previous response was incorrect when made, or though correct when made, is then no longer true.

### **Definitions**

1. All verbs are intended to include all tenses.

2. References to the singular are intended to include the plural and vice versa.

3. "Any" as well as "all" shall be construed to mean "each and every".



4. "And" as well as "or" shall be construed disjunctively as well as conjunctively, as necessary, in order to bring within the scope of these requests all information that might otherwise be construed to be outside their scope.

5. "Refer to" or "relate to" means constituting, defining, describing, discussing, involving, concerning, containing, embodying, reflecting, identifying, stating, analyzing, mentioning, responding to, referring to, dealing with, commenting upon, or in any way pertaining to.

**REQUEST FOR ADMISSIONS**

To: Stephani M. Reitz, Joseph A. Reitz and Sherri L. Reitz

1. Do you admit that State Farm Mutual Automobile Insurance Company policy No. 6431-769-38 covering a 1989 Chevrolet Beretta in effect August 6, 2003 provided for limited tort coverage.

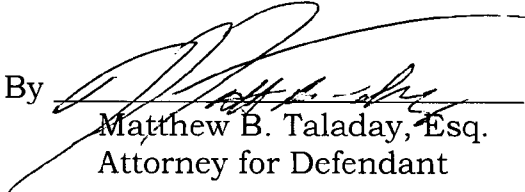
\_\_\_\_\_ Admitted

\_\_\_\_\_ Denied

Respectfully submitted,

HANAK, GUIDO and TALADAY

By

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

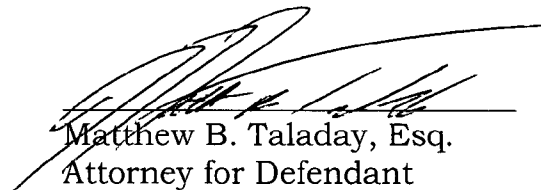
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**CERTIFICATE OF SERVICE**

I certify that on the 20th day of December, 2006, a true and correct copy of the foregoing Request for Admissions was sent via first class mail, postage prepaid, to the following:

Toni M. Cherry, Esq.  
Attorney for Plaintiffs  
Gleason, Cherry & Cherry  
P.O. Box 505  
DuBois, PA 15801

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

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

SHARYN K. WHITEMAN and GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ  
and SHERRI L. REITZ, her parents and natural guardians  
and JOSEPH A. REITZ and SHERRI L. REITZ, in their own  
rights and as parents and natural guardians of STEPHANI  
M. REITZ, a minor,  
Plaintiffs

vs.

RICHARD J. DOYLE, III,  
Defendant

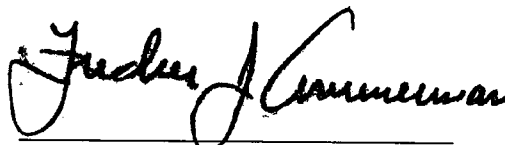
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\*

NO. 05-1129-CD

**ORDER**

AND NOW, this 2<sup>nd</sup> day of January, 2007, it is the ORDER of this Court that the  
Pre-Trial Conference in the above matter shall be held on the **24<sup>th</sup> day of January,**  
**2007 at 2:30 p.m. in Chambers.**

BY THE COURT,



FREDRIC J. AMMERMAN  
President Judge

FILED 1CC Atty's:  
01/14/07 BT T. Cherry  
JAN 03 2007 Taladay  
William A. Shaw  
Prothonotary/Clerk of Courts

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

SHARYN K. WHITEMAN and GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor, by JOSEPH A. REITZ  
and SHERRI L. REITZ, her parents and natural guardians  
and JOSEPH A. REITZ and SHERRI L. REITZ, in their own  
rights and as parents and natural guardians of STEPHANI  
M. REITZ, a minor,  
Plaintiffs  
vs.  
RICHARD J. DOYLE, III,  
Defendant

FILED <sup>acc Attys'</sup>  
9:20 AM T. Cherry  
JAN 26 2007 Taladay  
GK

William A. Shaw  
Prothonotary/Clerk of Courts

NO. 05-1129-CD

ORDER

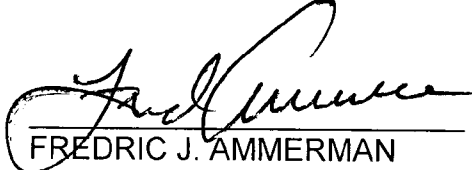
AND NOW, this 24<sup>th</sup> day of January, 2007, following Pre-Trial Conference with  
counsel for the parties as set forth above, it is the ORDER of this Court as follows:

1. Jury Selection will be held on February 1, 2007 commencing at 9:00 a.m. in  
Courtroom No. 1 of the Clearfield County Courthouse, Clearfield,  
Pennsylvania.
2. Jury Trial is hereby scheduled for Tuesday, May 15<sup>th</sup> and Wednesday, May  
16<sup>th</sup>, 2007 at 9:00 a.m. in Courtroom No. 1 of the Clearfield County  
Courthouse, Clearfield, Pennsylvania.
3. Any party making objections relative the testimony to be provided by any  
witness in the form of a deposition at time of trial shall submit said objections  
to the Court, in writing, no later than thirty (30) days prior to the  
commencement of trial. All objections shall reference specific page and line  
numbers within the deposition(s) in question along with that party's brief

relative same. The opposing party shall submit its brief in opposition to said objections no later than fifteen (15) days prior to the commencement of trial.

4. Any party filing any Motion or Petition regarding limitation or exclusion of evidence or testimony to be presented at time of trial, including but not limited to Motions in Limine, shall file the same no more than thirty (30) days prior to the trial date. The party's Petition or Motion shall be accompanied by an appropriate brief. The responding party thereto shall file its Answer and submit appropriate response brief no later than fifteen (15) days prior to trial.
5. Any further expert report(s) on the part of the Plaintiff shall be provided to the Defense by no later than February 23, 2007. Any expert report(s) to be produced in response to the Plaintiffs' expert report shall be provided by the Defense to the Plaintiff by no later than April 1, 2007. The testimony of any expert whose report has not been provided pursuant to the deadlines as set forth above shall not be permitted to testify during the time of trial.

BY THE COURT,

  
FREDRIC J. AMMERMAN  
President Judge

DATE: 1-26-2007

\_\_\_\_ You are responsible for the following parties:

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

\_\_\_\_ Plaintiff(s) ☒ Plaintiff(s) Attorney \_\_\_\_ Other

\_\_\_\_ Defendant(s) ☒ Defendant(s) Attorney

\_\_\_\_ Special Instructions:

**FILED**

**JAN 26 2007**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Certificate Prerequisite to  
Service of Subpoena

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

Dated: February 16, 2007

FILED  
FEB 20 2007  
m/s 30/0  
William A. Shaw  
Prothonotary/Clerk of Courts  
no c/c



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

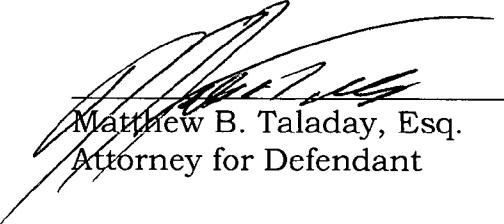
SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA  
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for the production of documents and things pursuant to Rule 4009.22, Plaintiffs certify that

1. A notice of intent to serve subpoena with a copy of subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the subpoena is sought to be served;
2. A copy of the notice, including the proposed subpoena, is attached to this certificate;
3. No objection to the subpoena has been received; and
4. The subpoena which will be served is identical to the one attached to the notice of intent to serve the subpoena.

Dated: February 16, 2007

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

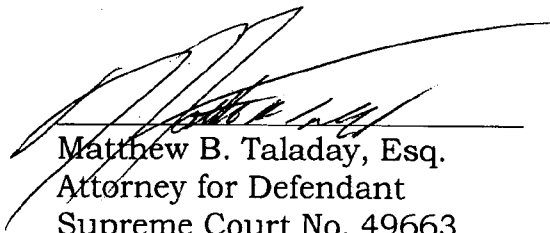
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF INTENT TO SERVE SUBPOENA  
TO PRODUCE DOCUMENTS AND THINGS  
FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant, Richard J. Doyle, III, intends to serve a subpoena identical to the one attached to this notice. You have twenty (20) days from the date listed below to file of record and serve upon the undersigned objections to the subpoena. If no objections are made, the subpoena may be served.

Date: 02-09-07



Matthew B. Taladay, Esq.  
Attorney for Defendant  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801  
(814) 371-7768

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Sharyn K. Whiteman and George T. Whiteman; \*  
Stephani M. Reitz, a minor, by Joseph A. Reitz  
and Sherri L. Reitz, her parents and natural  
guardians and Joseph A. Reitz and Sherri L.  
Reitz, in their own rights and as parents and  
natural guardians of Stephani M. Reitz, a minor  
Plaintiff(s)

Vs. \*

No. 2005-01129-CD

Richard J. Doyle III \*  
Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO  
RULE 4009.22

TO: Aaron M. Peters, D.C.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to  
produce the following documents or things:

All office records, office notes, reports, consultation reports, narratives,  
diagnostic tests, correspondence and bills for services rendered from 01/01/03  
to present for Sharyn K. Whiteman,      3 S. Brady Street, Suite 300  
S.S. No. 198-34-8989,      (Address)      P.O. Box 487  
D.O.B. 09/29/45.      DuBois, PA 15801

You may deliver or mail legible copies of the documents or produce things requested by  
this subpoena, together with the certificate of compliance, to the party making this request at the  
address listed above. You have the right to seek in advance the reasonable cost of preparing the  
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty  
(20) days after its service, the party serving this subpoena may seek a court order compelling you  
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Matthew B. Taladay, Esq.

ADDRESS: P.O. Box 487  
DuBois PA 15801

TELEPHONE: (814) 371-7768

SUPREME COURT ID # 49663

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division

  
Deputy

DATE: Wednesday, February 07, 2007  
Seal of the Court

**WILLIAM A. SHAW**  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2010  
Clearfield Co., Clearfield, PA

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Certificate Prerequisite to  
Service of Subpoena

Filed on Behalf of:

Defendant

Counsel of Record for This  
Party:

Matthew B. Taladay, Esq.  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

Dated: February 16, 2007

FILED  
FEB 20 2007  
M/8:30/w  
William A. Shaw  
Prothonotary/Clerk of Courts  
w/c/c

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

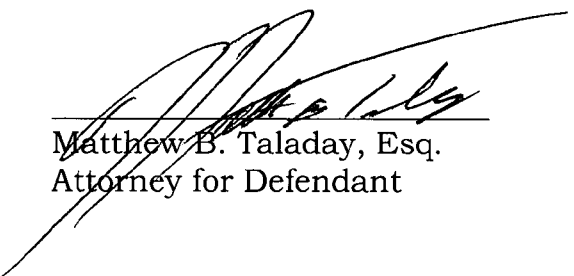
SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA  
PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoena for the production of documents and things pursuant to Rule 4009.22, Plaintiffs certify that

1. A notice of intent to serve subpoena with a copy of subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the subpoena is sought to be served;
2. A copy of the notice, including the proposed subpoena, is attached to this certificate;
3. No objection to the subpoena has been received; and
4. The subpoena which will be served is identical to the one attached to the notice of intent to serve the subpoena.

Dated: February 16, 2007

  
Matthew B. Taladay, Esq.  
Attorney for Defendant

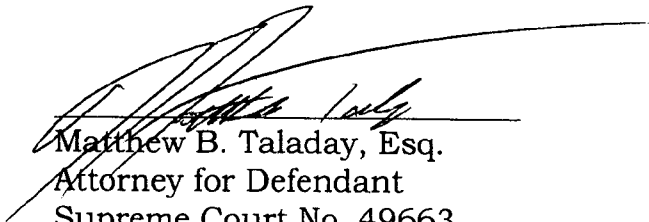
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**NOTICE OF INTENT TO SERVE SUBPOENA  
TO PRODUCE DOCUMENTS AND THINGS  
FOR DISCOVERY PURSUANT TO RULE 4009.21**

Defendant, Richard J. Doyle, III, intends to serve a subpoena identical to the one attached to this notice. You have twenty (20) days from the date listed below to file of record and serve upon the undersigned objections to the subpoena. If no objections are made, the subpoena may be served.

Date: 02-09-07

  
Matthew B. Taladay, Esq.  
Attorney for Defendant  
Supreme Court No. 49663  
Hanak, Guido and Taladay  
498 Jeffers Street  
P.O. Box 487  
DuBois, PA 15801  
(814) 371-7768

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

Sharyn K. Whiteman and George T. Whiteman; \*  
Stephani M. Reitz, a minor, by Joseph A. Reitz  
and Sherri L. Reitz, her parents and natural  
guardians and Joseph A. Reitz and Sherri L.  
Reitz, in their own rights and as parents and  
natural guardians of Stephani M. Reitz, a minor  
Plaintiff(s)

Vs.

\*

No. 2005-01129-CD

Richard J. Doyle III  
Defendant(s)

\*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO  
RULE 4009.22

TO: Gateway Area Medical Associates, Inc.  
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to  
produce the following documents or things:

All office records, office notes, reports, consultation reports, narratives,  
diagnostic tests, correspondence and bills for services rendered from 01/01/03  
to present for Stephani M. Reitz, 3 S. Brady Street, Suite 300  
S.S. No. 180-70-2423, (Address) P.O. Box 487  
D.O.B. 09/13/88. DuBois, PA 15801

You may deliver or mail legible copies of the documents or produce things requested by  
this subpoena, together with the certificate of compliance, to the party making this request at the  
address listed above. You have the right to seek in advance the reasonable cost of preparing the  
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty  
(20) days after its service, the party serving this subpoena may seek a court order compelling you  
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Matthew B. Taladay, Esq.  
ADDRESS: P.O. Box 487  
DuBois PA 15801  
TELEPHONE: (814) 371-7768  
SUPREME COURT ID # 49663  
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw  
Prothonotary/Clerk, Civil Division



Deputy

**WILLIAM A. SHAW**  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2010  
Clearfield Co., Clearfield, PA

DATE: Wednesday, February 07, 2007  
Seal of the Court

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARYN K. WHITEMAN and  
GEORGE T. WHITEMAN;  
STEPHANI M. REITZ, a minor,  
by JOSEPH A. REITZ and  
SHERRI L. REITZ, her parents  
and natural guardians and  
JOSEPH A. REITZ and SHERRI L.  
REITZ, in their own rights and  
as parents and natural guardians  
of STEPHANI M. REITZ, a minor,  
Plaintiffs

vs

RICHARD J. DOYLE, III,  
Defendant

Date: June 4, 2007

Type of Case: Civil Action

No. 2005-01129-CD

Type of Pleading:

Praecipe for  
Discontinuance

Filed on Behalf of:

Plaintiffs

Counsel of Record for This  
Party:

Toni M. Cherry, Esq.  
Supreme Court No. 30205  
Gleason, Cherry and Cherry, L.L.P.  
One North Franklin Street  
P.O. Box 505  
DuBois, PA 15801

(814) 371-5800

FILED

JUN 08 2007

William A. Shaw  
Prothonotary/Clerk of Courts

2 CENT OF DISC TO  
ATTY TALMADGE



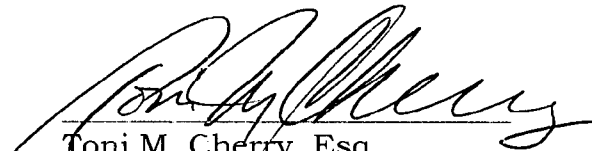
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION

SHARYN K. WHITEMAN and	:	
GEORGE T. WHITEMAN;	:	
STEPHANI M. REITZ, a minor,	:	
by JOSEPH A. REITZ and	:	
SHERRI L. REITZ, her parents	:	
and natural guardians and	:	
JOSEPH A. REITZ and SHERRI L.	:	
REITZ, in their own rights and	:	No. 2005-01129-CD
as parents and natural guardians	:	
of STEPHANI M. REITZ, a minor,	:	
Plaintiffs	:	
	:	
vs	:	
	:	
RICHARD J. DOYLE, III,	:	
Defendant	:	

**PRAECIPE FOR DISCONTINUANCE**

TO THE PROTHONOTARY:

Kindly mark the above case settled and discontinued.

  
Toni M. Cherry, Esq.  
Attorney for Plaintiffs

**HANAK, GUIDO and TALADAY**  
**Attorneys at Law**

Robert M. Hanak  
Anthony S. Guido  
Matthew B. Taladay

Telephone: (814) 371-7768  
Fax: (814) 371-1974

P.O. Box 487  
DuBois, PA 15801  
mbtaladay@verizon.net

Nicole Hanak Bankovich

June 7, 2007

William A. Shaw  
Prothonotary  
P.O. Box 549  
Clearfield, PA 16830

Re: Whiteman, et al. vs. Doyle  
No. 2005-01129-CD

Dear Mr. Shaw:

Enclosed for filing is a Praeipce for Discontinuance. Kindly forward a Certificate of Discontinuation to my office in the enclosed envelope. If you have any questions regarding the enclosed, please contact me. Thank you for your assistance in this matter.

Sincerely,



Matthew B. Taladay

MBT:kam

Enc.

cc: Toni M. Cherry, Esq.  
Steven Terry  
Claim No. 010110485739

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

**CIVIL DIVISION**

**Sharyn K. Whiteman  
George T. Whiteman  
Stephani M. Reitz  
Joseph A. Reitz  
Sherri L. Reitz**

**Vs.  
Richard J. Doyle III**

**No. 2005-01129-CD**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on June 8, 2007, marked:

Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by Gleason, Cherry & Cherry.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of June A.D. 2007.

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