

05-1734-CD

Joseph Rumfola al vs Lucy Randles

05-1734-CD

Joseph Rumfola, al vs Lucy Randles

Date: 11/8/2007

## Clearfield County Court of Common Pleas

User: LMILLER

Time: 10:12 AM

ROA Report

Page 1 of 3

Case: 2005-01734-CD

Current Judge: Fredric Joseph Ammerman

Joseph W. Rumfola, Brenda D. Rumfola vs. Lucy Randles

## Civil Other

Date		Judge
11/7/2005	New Case Filed.	No Judge
	<del>XX</del> Filing: Praecipe for Writ of Summons Paid by: Naddeo, James A. (attorney for Rumfola, Joseph W.) Receipt number: 1911183 Dated: 11/07/2005 Amount: \$85.00 (Check) No CC., 1 writ to shff.	No Judge
12/8/2005	<del>XX</del> Praecipe For Entry of Appearance, filed on behalf of Defendant, enter appearance of Katherine V. Oliver, Esquire, and James M. Horne, Esquire. by s/Katherine V. Oliver, Esquire. No CC	No Judge
	<del>XX</del> Praecipe For Rule to File Complaint, filed by s/ Katherine V. Oliver, Esquire. No CC, Rule to Atty Oliver	No Judge
12/13/2005	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter on the 12th day of December 2005 to James A. Naddeo Esq., filed by Katherine V. Oliver Esq. No CC.	No Judge
1/4/2006	<del>XX</del> Complaint, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
	<del>XX</del> Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
1/12/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of the Defendant's Interrogatories and Request for Production of Documents Directed to Plaintiffs (set one) and Request for Production of Documents and Tangible Things to Plaintiff (set two) in the above-captioned matter on this 11th day of January 2006 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq.	No Judge
1/13/2006	<del>XX</del> Certificate of Service, filed. Certify that Interrogatories Addressed to Defendant was served on Katherine V. Oliver Esq., on the 13th day of January, 2006, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
1/24/2006	<del>XX</del> Defendant's Answer with New Matter to Plaintiffs' Complaint, filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
1/27/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Thing in the above-referenced matter was mailed on the 26th day of January, 2006 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
2/6/2006	<del>XX</del> Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Katherine V. Oliver, Esquire. NO CC	No Judge
2/10/2006	<del>XX</del> Answer to New Matter, filed by s/ James A. Naddeo Esq. 1CC to Atty.	No Judge
2/14/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant's Answers and Objections to Plaintiffs' Interrogatories in the above-captioned matter was mailed on the 13th day of February, 2006 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
2/15/2006	<del>XX</del> Sheriff Return, November 16, 2005 served the within Summons on Lucy Randles. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm Shff Hawkins costs pd by Naddeo \$32.79	No Judge
2/21/2006	<del>XX</del> Answer to Interrogatories and Request for Production of Documents, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
3/16/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter this 15th day of March 2006, to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. NO CC.	No Judge

## Civil Other

Date		Judge
3/23/2006	<del>XX</del> Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Katherine V. Oliver, Esquire. No CC	No Judge
6/6/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant's Notices of Deposition and Request for Production of Documents in the above-captioned matter was mailed to James A. Naddeo on the 5th day of June 2006, filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
6/8/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant's Notice of Deposition and Request for Production of Documents in the above-captioned matter on the 7th day of June 2006 to James A. Naddeo Esq. No CC.	No Judge
6/12/2006	<del>XX</del> Certificate of Service, filed. That a copy of the Notice of Taking Deposition of Lucy Randles was served on Katherine V. Oliver Esq., on the 12th day of June 2006, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
6/13/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant's Amended Notices of Deposition and Request for Production of Documents in the above-captioned matter was mailed on the 12th day of June 2006 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
9/5/2006	<del>XX</del> Certificate of Service, filed. That a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was sent on this 1st day of September 2006 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. NO CC.	No Judge
9/13/2006	<del>XX</del> Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Katherine V. Oliver Esq. No CC.	No Judge
4/18/2007	<del>XX</del> Request For Status Conference, filed by s/ Katherine V. Oliver, Esquire. No CC	No Judge
4/27/2007	<del>XX</del> Order, NOW, this 26th day of April, 2007, it is Ordered that a status conference has been scheduled for 10:30 a.m. on May 29, 2007 in Chambers of the Honorable Fredric J. Ammerman. It is the responsibility of the Petitioner to serve certified copy of said scheduling Order on the Plaintiff. By The court, /s/ Fredric J. Ammerman, Pres. Judge. 3CC Atty. Oliver	Fredric Joseph Ammerman
5/1/2007	<del>XX</del> Certificate of Service, filed. That a true and correct copy of the Court's Order dated April 26, 2007 scheduling a status conference in the above-captioned matter was mailed on this 30th day of April 2007 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	Fredric Joseph Ammerman
5/2/2007	<del>XX</del> Motion For Continuance, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	Fredric Joseph Ammerman
5/4/2007	<del>XX</del> Order, NOW, this 3rd day of May, 2007, it is Ordered that a Status Conference is scheduled for the 5th day of June, 2007, at 11:00 a.m. in Courtroom 1. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Atty. Naddeo	Fredric Joseph Ammerman
5/7/2007	<del>XX</del> Certificate of Service, filed. That a certified copy of the Motion for Continuance and Order filed in the above-captioned case was served on the 7th day of May 2007 to Katherine V. Oliver Esq., filed by s/ James A. Naddeo Esq. NO CC.	Fredric Joseph Ammerman

## Civil Other

Date		Judge
5/14/2007	<p>Stipulated Order, this 11th day of May, 2007, parties having stipulated as to certain deadlines for expert discovery, it is Ordered:</p> <ol style="list-style-type: none"> <li>1. Plaintiff shall produce reports of any and all physicians and/or expert witnesses to be called at trial of this case within 60 days of the date of this Order; and</li> <li>2. Within 60 days of receipt of Plaintiffs' expert reports, Defendant shall identify any experts to be called at trial, and shall schedule any medical examination that will be conducted as part of Defendant's expert review in this case. By The Court, /s/ Fredric J. Ammerman, Pres. Judge.</li> </ol>	Fredric Joseph Ammerman
5/17/2007	Certificate of Service, filed. That a true and correct copy of the Court's Stipulated Order dated May 11, 2007 in the above-captioned matter was mailed on this 16th day of May 2007 to James A. Naddeo Esq. filed by s/ Chena L. Glenn-Hart Esq. No CC.	Fredric Joseph Ammerman
5/25/2007	Order, this 23rd day of May, 2007, the Court noting the Stipulated Order signed by this Court on May 11, 2007; it is the Order of this Court that the status conference scheduled for June 5, 2007 at 11:00 a.m. is canceled. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Attys: Naddeo, Oliver	Fredric Joseph Ammerman
7/11/2007	Certificate of Service, filed. That a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter this 10th day of July 2007 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. NO CC.	Fredric Joseph Ammerman
7/13/2007	Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Katherine V. Oliver, Esquire. No CC	Fredric Joseph Ammerman
8/8/2007	Certificate of Service, filed. That a true and correct copy of Defenant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter this 7th day of August 2007 to James A. Naddeo Esq., filed by s/ Katherine V Oliver Esq. No CC.	Fredric Joseph Ammerman
8/13/2007	Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.21, filed by s/ Katherine V. Oliver, Esquire. No CC	Fredric Joseph Ammerman
9/10/2007	Certificate of Service, filed. That a true and correct copy of the Interrogatories Addressed to Defendants (Set Two) filed in the above-captioned case was served on Katherine V. Oliver Esq on the 7th day of September 2007, filed by s/ James A. Naddeo Esq. No CC.	Fredric Joseph Ammerman
10/10/2007	Certificate of Service, filed. That a true and correct copy of Objection and Answers to Interrogatories Addressed to Defendant (Set II) in the above-captioned matter on James A. Naddeo Esq., on this 8th day of October 2007, filed by s/ Katherine V. Oliver Esq. No CC.	Fredric Joseph Ammerman
10/15/2007	Motion to Compel, filed by s/ James A. Naddeo, Esquire. 1CC Atty Naddeo	Fredric Joseph Ammerman
10/19/2007	Rule, this 18th day of Oct., 2007, upon consideration the the Motion to Compel, Rule is granted upon the Defendant. Rule Returnable and argument to be held the 15th day of Nov., 2007, at 2:00 p.m. in Courtroom 1. by The court, /s/ Fredric J. Ammerman, pres. Judge. 1CC Atty. Naddeo	Fredric Joseph Ammerman
10/23/2007	Certificate of Service, filed. That a certified copy of Motion to Compel filed in the above-captioned case was served on Katherine V. Oliver Esq on the 22nd day of October 2007, filed by s/ James A. Naddeo Esq. NO CC.	Fredric Joseph Ammerman
10/31/2007	Defendant's Response to Plaintiffs' Motion to Compel, filed by s/ Katherine V. Oliver, Esquire. No CC	Fredric Joseph Ammerman

11-14-07 Certificate of Service

## Civil Other

Date	Selected Items	Judge
11/20/2007	Order, this 19th day of Nov., 2007, following argument on Plaintiffs' Motion to Compel, it is Ordered that the Defense provide the following information to the Plaintiff within no more than twenty days from this date: (see original). By The Court, /s/Fredric J. Ammerman, Pres. Judge. 1CC Attys: Naddeo, Oliver & Horne.	Fredric Joseph Ammerman
12/11/2007	Certificate of Service, filed. That a true and correct copy of Defendant's Response to Plaintiffs' Expert Interrogatories in Accordance with the Court Order of November 19, 2007 in the above-captioned matter was mailed by first class mail on this 10th day of December 2007 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	Fredric Joseph Ammerman
12/31/2007	Certificate of Service, filed. That a true and correct copy of Interrogatories Addressed to Defendant's (set three) filed in the above-captioned case was served on the 22nd day of October 2007 by first class mail to Katherine V. Oliver Esq., filed by s/ James A. Naddeo Esq. NO CC.	Fredric Joseph Ammerman
1/22/2008	Amended Certificate of Service, filed. That a true and correct copy of Interrogatories Addressed to Defendants (set three) filed in the above-captioned case was served on the 22nd day of January 2008 by first-class mail to Katherine V. Oliver Esq., filed by s/ James A. Naddeo Esq. NO CC.	Fredric Joseph Ammerman
2/8/2008	Certificate of Service, filed. That a true and correct copy of Defendant's Responses to Plaintiffs' Interrogatories (set three) in the above-captioned matter was mailed by 1st class mail on this 7th day of February 2008 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	Fredric Joseph Ammerman
4/22/2008	Certificate of Readiness for Jury Trial, filed by s/ Katherine V. Oliver, Esquire. no CC	Fredric Joseph Ammerman
4/29/2008	Order, this 29th day of April, 2008, it is Ordered that the Pre-Trial Conference shall be held on the 19th day of May, 2008, at 9:30 a.m. in Chambers. Jury Selection is scheduled for July 24, 2008 in Courtroom 1. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC Attys; Horne, Oliver, Naddeo	Fredric Joseph Ammerman
5/12/2008	Certificate of Service, filed. That a true and correct copy of Defendant's Pre-trial Memorandum in the above-captioned matter was mailed by 1st class mail on this 12th day of May 2008 to James A. Naddeo Esq., filed by s/ Katherine V. Oliver Esq. No CC.	Fredric Joseph Ammerman

GEORGE E. BENDER  
MICHAEL D. MCNAUL  
ALLAN A. MCNAUL  
ANN ARGO  
RALPH MONACO  
ARDATH MORGAN  
SONYS LEA MCNAUL a/k/a SONYA LEA HART  
WILLIAM D. MCNAUL  
FRANCES A. GATTUSO  
JOHN M. DERR  
ROBERT A. DERR  
JENINE MCNAUL CAMPBELL  
RICHARD PELUSE  
KATHRYN COLLORD  
BARBARA J. MCNAUL  
MARTHA JANE SPINELLI  
MICHAEL R. MCNAUL  
ROBERT G. MCNAUL

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: 5/12/2008



William A. Shaw  
Prothonotary

Issuing Attorney:

John Sughrue  
23 North Second Street  
Clearfield, PA 16830  
814-765-1704

FILED Noce  
0/10:48 AM I writ to Shiff  
NOV 07 2005  
Any pd. 85.00  
W. Am. A. Shaw  
County Clerk of Courts

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

**SUMMONS**

**Joseph W. Rumfola  
Brenda D. Rumfola**

**Vs.**

**NO.: 2005-01734-CD**

**Lucy Randles**

**TO: LUCY RANGLES**

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: 11/07/2005

---

William A. Shaw  
Prothonotary

Issuing Attorney:

James A. Naddeo  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601



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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **PRAECIPE FOR ENTRY OF**  
: **APPEARANCE**  
:  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:

: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED<sup>NO</sup>  
m 4:00 PM  
DEC 08 2005 CC

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**PRAECIPE FOR ENTRY OF APPEARANCE**

TO THE PROTHONOTARY:

Please enter our appearance on behalf of the Defendant, Lucy Randles, in the above-captioned matter.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

Dated: December 7, 2005

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



Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I.D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of our Praecipe for Entry of Appearance on behalf the Defendant Lucy Randles, in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 7<sup>th</sup> day of December, 2005, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **PRAECIPE FOR RULE TO**  
: **FILE COMPLAINT**

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:  
: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED**

m/4/0001  
DEC 08 2005

William A. Shaw  
Prothonotary/Clerk of Courts

cc  
Rule to  
Atty Oliver

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Praecept for Rule to File Complaint on behalf of Defendant in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 7<sup>th</sup> day of December, 2005, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

 COPY

Joseph W. Rumfola and  
Brenda D. Rumfola

Vs.  
Lucy Randles

Case No. 2005-01734-CD

RULE TO FILE COMPLAINT

TO: Joseph W. & Brenda D. Rumfola  
c/o James A. Naddeo, Esquire  
PO Box 552  
Clearfield, PA 16830

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: December 8, 2005

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *no cc*  
*11/21/05*  
DEC 13 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

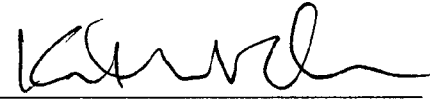
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 12<sup>th</sup> day of December, 2005, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant



William A. Shaw  
Prothonotary

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

NOTICE

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

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

Court Administrator  
Clearfield County Courthouse  
Market and Second Streets  
Clearfield, PA 16830

(814) 765-2641, ext. 5982

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

COMPLAINT

NOW COME the Plaintiffs, Joseph W. Rumfola and Brenda D. Rumfola, and by their attorney, James A. Naddeo, Esquire, set forth the following:

1. That the Plaintiffs are Joseph W. Rumfola and Brenda D. Rumfola, husband and wife, who reside at 1061 Bloomington Avenue Extension, Curwensville, PA 16833.

2. That the Defendant is Lucy Randles, an individual, who resides at 3373 Wilkinson Street, Akron, OH 44333.

3. That at all times referred to herein Plaintiffs were the owners of a 1989 Plymouth Voyager bearing Pennsylvania License Plate No. ENE-9768.

4. That at all times referred to herein the Defendant, Lucy Randles, was the owner of a 1999 Chevrolet Tahoe bearing Ohio License Plant No. CCW-5707.

First Count  
Brenda D. Rumfola v. Lucy Randles

5. That on or about December 1, 2003 at approximately 4:47 p.m., E.S.T., the Plaintiff, Brenda D. Rumfola, was the operator of the vehicle described in Paragraph 3 hereof which is incorporated herein by reference.

6. That on or about the said day and at or about the said time, the Defendant, Lucy Randles, was the operator of the vehicle described in Paragraph 4 hereof which is incorporated herein by reference.

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

8. That on or about the said day and at or about the said time, the Plaintiff, Brenda D. Rumfola, was operating her vehicle in a westerly direction on Pa. State Route 879.

9. That on or about the said day and at or about the said time, the Defendant, Lucy Randles, was likewise operating her vehicle in a westerly direction on Pa. State Route 879.

10. That Pa. Route 879 at a point adjacent to the on-ramp from US Route 322 is a three-lane macadam highway consisting of a through lane and a merging lane.

11. That on or about the said day and at or about the said time, the Plaintiff, Brenda D. Rumfola, had reached the

point on Pa. State Route 879 described in Paragraph 10 hereof which is incorporated herein by reference.

12. That on or about the said day and at or about the said time, the Defendant, Lucy Randle's, vehicle was parked in the western berm of Pa. Route 879 adjacent to the merging lane described in Paragraph 10 hereof which is incorporated herein by reference.

13. That on or about the said day and at or about the said time, the Defendant, Lucy Randles, suddenly and without warning moved her vehicle from the western berm of Pa. Route 879 and attempted a u-turn across said roadway directly into the path of the vehicle operated by the Plaintiff, Brenda D. Rumfola, which vehicle was lawfully proceeding in the through lane of travel.

14. That as a direct result of the maneuver conducted by the Defendant, Lucy Randles, as described in Paragraph 13 hereof which is incorporated herein by reference, the front of Plaintiff's vehicle impacted with the side of Defendant's vehicle in Plaintiff's proper lane of travel.

15. That as a result of the impact described in Paragraph 14 hereof which is incorporated herein by reference, the Plaintiff, Brenda D. Rumfola, was thrown generally forward and backward within the vehicle which she was operating causing the numerous and serious injuries hereinafter described.

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16. That the Defendant, Lucy Randles, was guilty of the following negligence, recklessness and carelessness which was the proximate cause of the accident and the injuries to the Plaintiff, Brenda D. Rumfola, as follows:

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

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

C. That the Defendant, Lucy Randles, violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3714, 75 Pa. C.S.A. Section 3174 and supplements thereto in that she operated her vehicle upon Pa. Route 879 with careless disregard for the safety of the Plaintiff, Brenda D. Rumfola.

D. That the Defendant, Lucy Randles, violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3736, 75 Pa. C.S.A. Section 3736, and supplements thereto, in that she operated her vehicle upon Pa. Route 879 in willful or wanton disregard for the safety of the person or property of the Plaintiff, Brenda D. Rumfola.

E. That the Defendant, Lucy Randles, violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3332, 75 Pa. C.S.A. Section 3332 and

supplements thereto, in that she attempted to turn her vehicle in the opposite direction when such maneuver could not be made in safety and without interference with other traffic.

F. That the Defendant, Lucy Randles, violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3333, 75 Pa. C.S.A. Section 3333 and supplements thereto, in that she moved her vehicle from a parked or standing position onto the main traveled portion of the highway at a time when said movement could not be made with safety.

G. That the Defendant, Lucy Randles, violated the Motor Vehicle Code of 1976, June 17, P.L. 162, Section 3334, 75 Pa. C.S.A. Section 3334 and supplements thereto, in that she entered the traffic stream from a parked position when said movement could not be made with reasonable safety and while failing to give an appropriate signal as required by 75 Pa. Section 3335.

H. That the Defendant, Lucy Randles, was negligent, careless and reckless in that she failed to use due care under all circumstances of the case.

17. That as a result of the collision described in Paragraph 10 hereof, the Plaintiff, Brenda D. Rumfola, suffered the following injuries which may and probably will be permanent:

- A. Laceration right knee;
- B. Severe bruising right and left knees;
- C. Suspected cartilage tear both knees;
- D. Strain of cervical spine;
- E. Strain of lumbar spine;
- F. Bruised sternum.

18. That as a result of the injuries referred to in Paragraph 17 hereof, the Plaintiff, Brenda D. Rumfola, may incur medical expenses for the treatment of her injuries in excess of her available first party medical benefits.

19. That the Plaintiff, Brenda D. Rumfola, claims a reasonable amount for the following:

- A. Pain and suffering: past, present and future;
- B. Privation and inconvenience: past, present and future;
- C. Loss of income: past, present and future;
- D. Future medical expenses;
- E. All other damages allowable by law.



WHEREFORE, the Plaintiff, Brenda D. Rumfola, claims damages from the Defendant, Lucy Randles, in excess of Twenty Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.

Second Count  
Joseph W. Rumfola v. Lucy Randles

20. That the Plaintiff, Joseph W. Rumfola, incorporates Paragraphs 1 through 19 of the First Count of this Complaint by reference and makes them a part hereof.

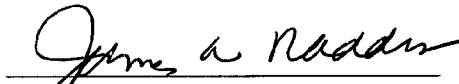
21. That the Plaintiff, Joseph W. Rumfola, is the husband of Brenda D. Rumfola having been married to her on September 6, 1975.

22. That at all times referred to herein, the Plaintiff, Joseph W. Rumfola, was residing with his wife, Brenda D. Rumfola, and continues to reside with her up to the date of this Complaint.

20. That as a result of the injuries suffered by the Plaintiff, Brenda D. Rumfola, the Plaintiff, Joseph W. Rumfola, has been deprived of the services and society of his wife and will continue to be so deprived for an indefinite period of time in the future.


WHEREFORE, Plaintiff, Joseph W. Rumfola, claims damages from the Defendant, Lucy Randles, in excess of Twenty

Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.

  
James A. Naddeo  
Attorney for Plaintiffs

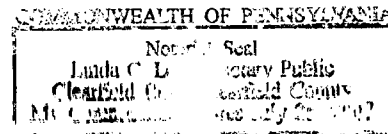
COMMONWEALTH OF PENNSYLVANIA )  
COUNTY OF CLEARFIELD )

Before me, the undersigned officer, personally appeared BRENDA D. RUMFOLA, who being duly sworn according to law, depose and state that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

  
Brenda D. Rumfola

SWORN and SUBSCRIBED before me this 30<sup>th</sup> day of December, 2005.

*Sredal Lewis*  
COMMONWEALTH OF PENNSYLVANIA



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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a  
certified copy of the Complaint was served on the following and in  
the following manner on the 3rd day of January, 2006:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801

  
James A. Naddeo  
Attorney for Plaintiffs

FILED

JAN 03 2006

William A. Shaw  
Prothonotary

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE PREREQUISITE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED**

**JAN 04 2006**

m/1/15/06  
William A. Shaw

Prothonotary/Clerk of Courts

No 9/C

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

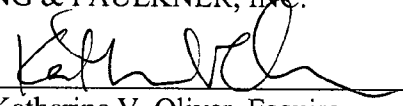
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**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF SUBPOENAS**  
**PURSUANT TO RULE 4009.22**

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendants certify that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto were mailed or delivered to the party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, are attached to this certificate,
- 3) no objection to the subpoenas has been received; and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:   
Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: January 3, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

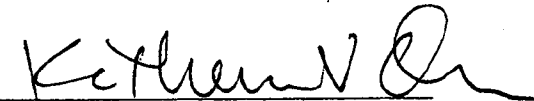
No. 2005-01734-CD

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

Defendant intends to serve subpoenas identical to those attached to this notice to Clearfield Emergency Medical Service, Clearfield Hospital and Horace Mann Insurance. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: December 12, 2005



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Horace Mann Insurance Company*  
*Attention: Medical Records Custodian*  
*235 St. Charles Way*  
*Suite 250*  
*York, PA 17402*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *a true and correct copy of the first-party file in your possession pertaining to Brenda D. Rumfola, Policy # 37-66253150, Date of Loss: 12/1/03 .*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

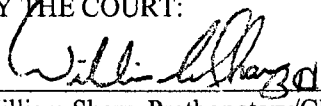
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



William Shaw, Prothonotary/Clerk

Civil Division

[Seal of the Court]

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

Dated: 12/13/05

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: Clearfield Hospital  
Attention: Medical Records Custodian  
809 Turnpike Avenue  
Clearfield, PA 16830

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

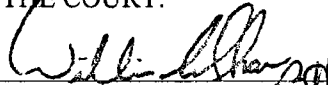
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive, State College, PA 16801  
TELEPHONE: (814) 238-4926  
SUPREME CT ID#: 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 12/13/05

WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Clearfield Emergency Medical Service*  
*Attention: Medical Records Custodian*  
*713 West Front Street*  
*Clearfield, PA 16830*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

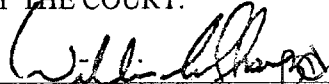
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 12/13/05

WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoenas Directed to Clearfield Emergency Medical Service, Clearfield Hospital and Horace Mann Insurance Company, in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 3<sup>rd</sup> day of January, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *no cc*  
*211:4726*  
**JAN 12 2006** *LM*  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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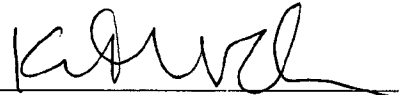
No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Defendant's Interrogatories and Request for Production of Documents Directed to Plaintiffs (Set One) and Request for Production of Documents and Tangible Things Directed to Plaintiffs (Set Two) in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 11<sup>th</sup> day of January, 2006 to the attorney(s) of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I.D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant



**FILED** *ice*  
*013,45/01 Amy*  
**JAN 13 2006** *Naddeo*  
*LM*  
 William A. Shaw  
 Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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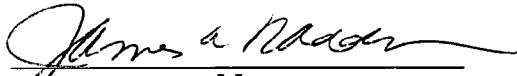
No. 05-1734-CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that  
Interrogatories Addressed to Defendant was served on the following  
and in the following manner on the 13th day of January, 2006:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

  
James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **DEFENDANT'S ANSWER WITH NEW**  
: **MATTER TO PLAINTIFFS' COMPLAINT**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *no cc*  
*01/01/28/01*  
**JAN 24 2006**  
*LM*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

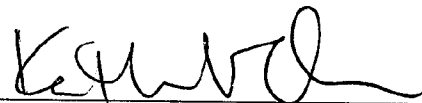
**NOTICE TO PLEAD**

TO: Joseph W. & Brenda D. Rumfola  
c/o James A. Naddeo, Esquire  
P.O. Box 552  
Clearfield, PA 16830

YOU ARE HEREBY notified to file a written response to the enclosed Answer with New Matter to Plaintiffs' Complaint within twenty (20) days from the date of service hereof or a judgment may be entered against you.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

Dated: January 23, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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:

No. 2005-01734-CD

**DEFENDANT'S ANSWER WITH NEW MATTER TO**  
**PLAINTIFFS' COMPLAINT**

AND NOW, comes Defendant, Lucy Rangles, by and through her attorneys, McQuaide, Blasko, Fleming & Faulkner, Inc., and files the following Answer with New Matter to Plaintiffs' Complaint.

1. Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 1. The same are therefore denied and strict proof thereof demanded.

2. Admitted.

3. Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the averments of paragraph 3. The same are therefore denied and strict proof thereof demanded.

4. Admitted.

5. Admitted in part and denied in part. It is denied that the events in question occurred at approximately 4:47. To the contrary, Defendant believes that the events occurred

substantially later than that time. The balance of the averments of paragraph 5 are admitted on information and belief.

6. Admitted.

7. Denied. To the contrary, on that day and at the time of the events at issue, it was very dark, there had been a heavy snow fall, and there was black ice on the roadway, which was not known to Defendant until after the accident at issue.

8. Admitted, with the exception of the allegations as to time, which are denied.

9. Admitted, with the exception of the allegations as to time, which are denied.

10. Denied. Defendant is not sure of the precise location that Plaintiff is attempting to describe in paragraph 10, and thus lacks sufficient knowledge or information, after reasonable investigation, to form a belief as to the truth of the same. The allegations are therefore denied and strict proof thereof demanded. Defendant further responds that the location where the events at issue occurred was further westbound on SR 879 than the 322 on-ramp. In the location where the accident occurred, the roadway is two travel lanes in each direction, and there is a wide berm on westbound SR 879. Any implication to the contrary is denied.

11. Denied for the reasons set forth in paragraphs 5 and 10, above, incorporated herein by reference.

12. Denied. Please see response to paragraphs 5 and 10, above, incorporated herein by reference. By way of further response, it is denied that Defendant was stopped on the west berm of SR 879 adjacent to a merging lane. To the contrary, Defendant pulled her vehicle to the right hand berm of SR 879, where she stopped temporarily, at a location further westbound on SR 879 than the 322 on-ramp and merging lane.

13. Denied. Please see response to paragraphs 5 and 10, above, incorporated herein by reference. By way of further response, it is denied that Defendant suddenly and without warning moved her vehicle from the western berm on Route 879, and denied that Defendant, at any time, attempted a U-turn across said roadway. To the contrary, Defendant was in the process of attempting to lawfully re-enter Route 879 from the berm when she encountered black ice and lost control of her vehicle, causing her vehicle to cross into the path of the vehicle operated by Plaintiff. By way of further response, after reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the averments that Plaintiff's operation of her vehicle was lawful in all respects. The same are therefore denied and strict proof thereof demanded.

14. Admitted in part and denied in part. It is admitted only that the front of Plaintiff's vehicle impacted with the side of Defendant's vehicle, and that the impact occurred in Plaintiff's lane of travel. The remainder of the averments in paragraph 14 are denied and strict proof thereof demanded. By way of further response, Defendant incorporates her answer in paragraph 13, above.

15. Denied. Defendant incorporates by reference paragraphs 13 and 14, above. By way of further response, after reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the averments regarding what happened to Plaintiff as a result of the impact, and regarding Plaintiff's alleged injuries and damages. The allegations regarding the same are therefore denied and strict proof thereof demanded.

16. Denied. All allegations of negligence, recklessness and carelessness are denied pursuant to Pennsylvania Rule of Civil Procedure 1029(e).

- (a) It is denied that Defendant was negligent and failed to have her vehicle under proper control;
- (b) It is denied that Defendant failed to maintain a proper lookout;
- (c) It is denied that Defendant violated the Motor Vehicle Code Sections referenced, and denied that Defendant operated her vehicle with careless disregard for the safety of Plaintiff;
- (d) It is denied that Defendant violated the Motor Vehicle Code Sections referenced, and denied that Defendant operated her vehicle in a willful or wanton disregard for the safety of the person or property of Plaintiff;
- (e) It is denied that Defendant violated the Motor Vehicle Code Section referenced, and denied that Defendant attempted to turn her vehicle in the opposite direction as alleged;
- (f) It is denied that Defendant violated the Motor Vehicle Code Section referenced, and denied that Defendant moved her vehicle from a parked or standing position onto the main traveled portion of the highway at a time when the movement could not be made with safety;
- (g) It is denied that Defendant violated the Motor Vehicle Code Sections referenced, denied that Defendant entered the traffic stream from a parked position when the movement could not be made with reasonable safety, and denied that Defendant failed to give an appropriate signal
- (h) Denied. By way of further response, please see paragraph 13, above.

17. Denied. It is denied that the collision occurred in the manner described in Plaintiffs' Complaint. With respect to Plaintiffs' allegations of injuries and damages, after



reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the same. The allegations are therefore denied and strict proof thereof demanded.

18-19. Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraphs 18-19. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Lucy Randles respectfully requests that Plaintiffs' Complaint be dismissed, with prejudice and costs of suit.

**Second Count**  
**Joseph W. Rumfola vs. Lucy Randles**

20. Defendant incorporates by reference paragraphs 1-19 of this Answer with New Matter as though set forth in full.

21. Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 21. The same are therefore denied and strict proof thereof demanded.

22. Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 22. The same are therefore denied and strict proof thereof demanded.

20. [sic] Denied. After reasonable investigation, Defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 20. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Lucy Randles respectfully requests that Plaintiffs' Complaint be dismissed, with prejudice and costs of suit.

**NEW MATTER**

24. The averments at paragraphs 1-20 [sic] of this Answer with New Matter are incorporated herein by reference as though set forth in full.

25. Defendant hereby raises and asserts all those defenses and/or limitations on damages available by reason of the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

26. To the extent Plaintiff's medical expenses, if any, have been paid or are payable under a policy of insurance, the same may not be plead, proven or recovered in the instant action.

27. To the extent Plaintiff was insured under a policy of insurance carrying the limited tort option, Plaintiff's claims are barred or reduced accordingly.

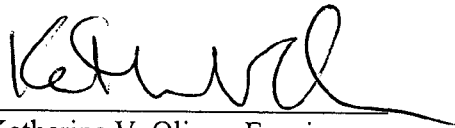
28. Plaintiff's injuries and damages, if any, are unrelated to the motor vehicle incident at issue.

29. Defendant hereby raises the sudden emergency doctrine.

WHEREFORE, Defendant Lucy Randles respectfully requests that Plaintiffs' Complaint be dismissed, with prejudice and costs of suit.

Dated: January 23, 2006

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

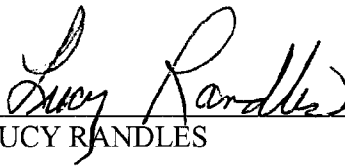
By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I.D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

## **VERIFICATION**

The undersigned verifies that she is authorized to make this Verification on her own behalf, and that the statements made in the foregoing Answer with New Matter to Plaintiffs' Complaint are true and correct to the best of her knowledge, information and belief. The undersigned understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.

  
\_\_\_\_\_  
LUCY RANGLES

Dated: 1/19/2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

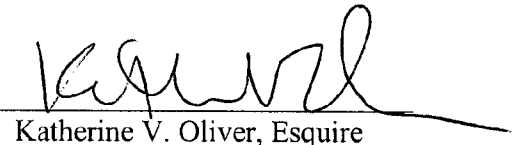
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Answer with New Matter to Plaintiffs' Complaint in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 23<sup>rd</sup> day of January, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *mc*  
*mjl:5187*  
**JAN 27 2008** *(S)*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 26<sup>th</sup> day of January, 2006, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE PREREQUISITE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *NP CC*  
*m 11:32/01*  
**FEB 06 2006** *GP*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF SUBPOENAS**  
**PURSUANT TO RULE 4009.22**

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendants certify that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto were mailed or delivered to the party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, are attached to this certificate,
- 3) Plaintiffs' attorney has waived the 20-day objection period; and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: February 3, 2006



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

Defendant intends to serve subpoenas identical to those attached to this notice to Mark Piasio, M.D., Phuong T. Wirth, D.O., A. Glenn Williams, D.C. and Ralph A. Cardamone, M.D. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: January 26, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Mark Piasio, M.D.*  
*Attention: Medical Records Custodian*  
*East Allegheny Center*  
*145 Hospital Avenue, Suite 311*  
*DuBois, PA 15801*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

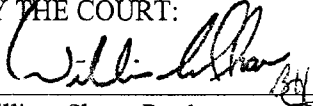
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 11/27/06

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

Joseph W. & Brenda D. Rumfola v. Lucy Randles

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

Joseph W. & Brenda D. Rumfola v. Lucy Randles

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS**  
**FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: *Ralph A. Cardamone, M.D.*  
*Attention: Medical Records Custodian*  
*10 S. 2<sup>nd</sup> Street*  
*Clearfield, PA 16830*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

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

Dated: 1/27/06

Joseph W. & Brenda D. Rumfola v. Lucy Randles

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS**  
**FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: A. Glenn Williams, D.C.  
Attention: Medical Records Custodian  
Village Chiropractors  
800 State Street  
Curwensville, PA 16833

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*


You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive, State College, PA 16801  
TELEPHONE: (814) 238-4926  
SUPREME CT ID#: 77069  
ATTORNEY FOR: Defendant

BY THE COURT:



William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

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

Dated: 11/27/06



Joseph W. & Brenda D. Rumfola v. Lucy Randles

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

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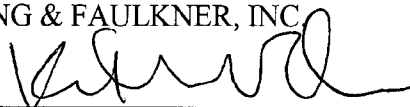
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoenas Directed to Mark Piasio, M.D., Phuong T. Wirth, D.O., A. Glenn Williams, D.C. and Ralph A. Cardamone, M.D., in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 3<sup>rd</sup> day of February, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC

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

  
Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**ANSWER TO NEW MATTER**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

**FILED**

FEB 10 2006

o/w/ww/w

William A. Shaw

Prothonotary/Clerk of Courts

1 CENT TO ATT

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *WCC*  
*m 11:32 AM*  
**FEB 14 2008** *LM*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

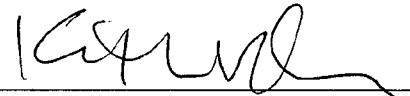
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Answers and  
Objections to Plaintiffs' Interrogatories in the above-captioned matter was mailed by U.S.  
1<sup>st</sup> Class Mail, postage prepaid, on this 13<sup>th</sup> day of February, 2006, to the attorney of  
record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I.D. No. 26908

811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100985  
NO: 05-1734-CD  
SERVICE # 1 OF 1  
SUMMONS

PLAINTIFF: JOSEPH W. RUMFOLA and BRENDA D. RUMFOLA  
vs.  
DEFENDANT: LUCY RANGLES

SHERIFF RETURN

NOW, November 16, 2005 SERVED THE WITHIN SUMMONS ON LUCY RANGLES DEFENDANT AT 3373 WILKINSON ST., AKRON, OH, 44333 BY CERTIFIED MAIL # 7003 3110 0001 9380 1005. THE RETURN RECEIPT IS HERETO ATTACHED ENDORSED BY TED A. RANGLES.

FILED  
013:09:81  
FEB 15 2006  
UM

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NADDEO	17703	10.00
SHERIFF HAWKINS	NADDEO	17703	22.79

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2006

\_\_\_\_\_

So Answers,

  
by   
Chester A. Hawkins  
Sheriff

**SENDER: COMPLETE THIS SECTION**

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

## 1. Article Addressed to:

LUCY RANGLES  
3373 Wilkinson St.  
Akron, OH 44333

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X**☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

## 3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

## 2. Article Number

(Transfer from service label)

7003 3110 0001 9380 1005

UNITED STATES POSTAL SERVICE

AKRON OH 443

16 NOV 2005 PM 1 L

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

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

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

100985

16830+2438



7003 3110 0000 9380 1000

<b>U.S. Postal Service™</b>	
<b>CERTIFIED MAIL™ RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ 0.37
Certified Fee	\$2.30
Return Receipt Fee (Endorsement Required)	\$1.75
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 4.42
0830 07 Postmark Here	
11/14/2005	
Sent To LUCY RANGLES	
Street, Apt. No., or PO Box No. 3373 Wilkinson St.	
City, State, ZIP+4 Akron, OH 44333	
PS Form 3800, June 2002 See Reverse for Instructions	

### **Certified Mail Provides:**

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

### **Important Reminders:**

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

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

100 985

PS Form 3800, June 2002 (Reverse)

**FILED** *Ice*  
*Atty Nadder*  
*01/11/05*  
**FEB 21 2006**  
*UN*  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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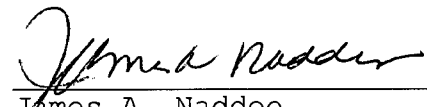
No. 05-1734-CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that  
Answer to Interrogatories and Request for Production of Documents  
was served on the following and in the following manner on the  
21st day of February, 2006:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

  
\_\_\_\_\_  
James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
:  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:

: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED <sup>no cc</sup>  
m/1135/BL  
MAR 10 2006 (SM)

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 15<sup>th</sup> day of March, 2006, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I. D. No. 26908

811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE PREREQUISITE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED**

**MAR 23 2006**

mf 12:30 CW  
William A. Shaw

Prothonotary/Clerk of Courts

no c/c

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF SUBPOENAS**  
**PURSUANT TO RULE 4009.22**

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendants certify that:

- 1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto were mailed or delivered to the party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, are attached to this certificate,
- 3) Plaintiffs' attorney has waived the 20-day objection period; and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I. D. No. 26908

811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

Dated: March 22, 2006



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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

Defendant intends to serve subpoenas identical to those attached to this notice to  
Charlene C. DeMarco, D.O., Terrence Babb, M.D., Eric W. Simons, M.D. and Lock Haven  
University. You have twenty (20) days from the date listed below in which to file of record and  
serve upon the undersigned any objection to the subpoenas. If no objection is made, the  
subpoenas may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

Dated: March 15, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Charlene C. DeMarco, D.O.*  
*Attention: Medical Records Custodian*  
*462 South Philadelphia Avenue*  
*Egg Harbor City, NJ 08215*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

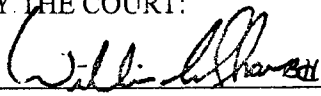
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 3/11/06

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

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Terrence Babb, M.D.*  
*Attention: Medical Records Custodian*  
*807 Turnpike Avenue*  
*Clearfield, PA 16830*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

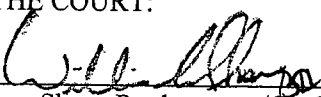
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID# *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 3/16/06

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

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Eric W. Simons, M.D.*  
*Attention: Medical Records Custodian*  
*807 Turnpike Avenue*  
*Clearfield, PA 16830*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

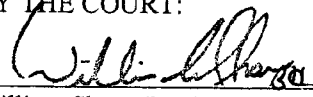
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 3/16/06

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

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Lock Haven University*  
*Attention: Records Custodian*  
*401 North Fairview Street*  
*Lock Haven, PA 17745*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *A true and correct copy of any and all academic records, including but not limited to transcripts and disciplinary records, and any records including but not limited to, personnel records, retirement benefits, attendance records, and pay rate information within your custody or control pertaining to Plaintiff Brenda D. Rumfola, DOB: 10/17/62.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

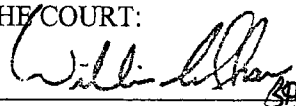
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
\_\_\_\_\_  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 3/16/06

**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  
CIVIL ACTION - LAW

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoenas Directed to Charlene C. DeMarco, D.O., Terrence Babb, M.D., Eric W. Simons, M.D. and Lock Haven University in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 22<sup>nd</sup> day of March, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I. D. No. 26908

811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:

: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED**

JUN 06 2006  
m/11:00/1  
William A. Shaw  
Prothonotary/Clerk of Courts  
no c/c

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

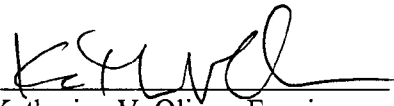
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Notices of Deposition and Request for Production of Documents in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 5<sup>th</sup> day of June, 2005, to the attorney(s) of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I.D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED <sup>no cc</sup>  
JUN 08 2006  
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LS

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Notices of Deposition and Request for Production of Documents in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7<sup>th</sup> day of June, 2005, to the attorney(s) of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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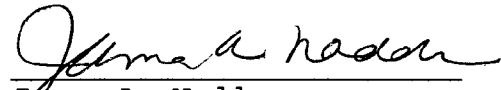
No. 05-1734-CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of the Notice of Taking Deposition of Lucy Randles was served on the following and in the following manner on the 12th day of June, 2006:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699



James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED** NO  
mli:25/61 ce  
JUN 13 2006  
William A. Shaw  
Prothonotary/Clerk of Courts



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Amended Notices of Deposition and Request for Production of Documents in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 12<sup>th</sup> day of June, 2005, to the attorney(s) of record:

James A. Naddeo, Esquire  
207 East Market Street  
Clearfield, PA 16830

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
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:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** Noce  
M/2:27um  
SEP 05 2006  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

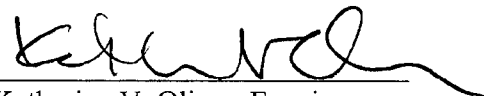
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 1<sup>st</sup> day of September, 2006, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE PREREQUISITE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
:  
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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED <sup>NO CC</sup>  
SEP 12 2006

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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: No. 2005-01734-CD  
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**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF A SUBPOENA**  
**PURSUANT TO RULE 4009.22**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve a subpoena with a copy of the subpoena attached thereto was mailed or delivered to the party at least twenty days prior to the date on which the subpoena is sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- 3) Plaintiffs' attorney has waived the 20-day objection period; and
- 4) the subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: September 11, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

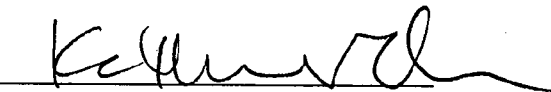
No. 2005-01734-CD

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

Defendant intends to serve a subpoena identical to that attached to this notice to Joseph T. Joseph, M.D. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the subpoena. If no objection is made, the subpoena may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: September 1, 2006

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Joseph T. Joseph, M.D.*  
*Attention: Medical Records Custodian*  
*1466 North Hermitage Road*  
*Hermitage, PA 16148*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

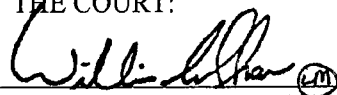
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
\_\_\_\_\_  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: September 5, 2006

**DOCUMENTS TO BE PRODUCED**

Any and all records for as long as you retain same and regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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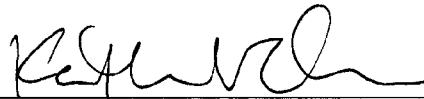
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of a Subpoena Directed to Joseph T. Joseph, M.D. in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 11<sup>th</sup> day of September, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

CA

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**REQUEST FOR STATUS CONFERENCE**

AND NOW COMES Defendant, Lucy Randles, by and through her attorneys, McQuaide, Blasko, Fleming & Faulkner, Inc., and respectfully requests that a status conference be scheduled in the above matter in accordance with Clearfield County Rule 212.1. More than 60 days have passed since the filing of Plaintiffs' Complaint.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire  
I.D. No. 77069

James M. Horne, Esquire  
I.D. No. 26908

811 University Drive  
State College, PA 16801  
(814) 238-4926  
Attorneys for Defendant

Dated: April 17, 2007

**FILED**

APR 18 2007

12:35/wn

William A. Shaw  
Prothonotary/Clerk of Courts

no c/c

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of a Request for Status Conference in the  
above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State  
College, Pennsylvania, on this 17<sup>th</sup> day of April, 2007, to the attorney(s) of record:

James A. Naddeo, Esquire  
207 East Market Street  
Clearfield, PA 16830

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA

vs.

LUCY RANGLES

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: No. 05-1734-CD  
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**ORDER**

AND NOW, this 26 day of April, 2007, it is the ORDER of the Court at the request of Defendant's Counsel that a status conference in the above-captioned matter has been scheduled for 10:30 A.M. on Tuesday, May 29, 2007 in Chambers of the Honorable Fredric J. Ammerman, Clearfield County Courthouse, Clearfield, PA.

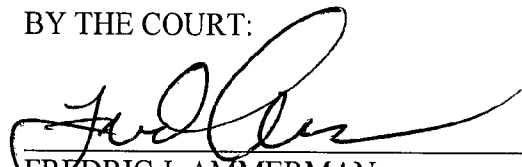
It is the responsibility of the Petitioner to serve certified copy of said scheduling Order on the Plaintiff.

FILED  
APR 27 2007

3cc  
Amy Oliver  
@

William A. Shaw  
Prothonotary/Clerk of Courts

BY THE COURT:

  
FREDRIC J. AMMERMAN  
President Judge

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

:  
:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED <sup>NO CC</sup>  
MAY 01 2007 <sup>10:51 AM</sup> 

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Court's Order dated April 26, 2007 scheduling a status conference in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 30<sup>th</sup> day of April, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

**FILED**

MAY 01 2007

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

MAY 01 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 01734 - CD

Type of Pleading:

**MOTION FOR CONTINUANCE**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

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

Naddeo & Lewis, LLC  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601

FILED *icc AH*  
9/3:55 *cm*  
MAY 02 2007 *(57)*  
*Naddeo*

William A. Shaw  
Prothonotary/Clerk of Courts



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 01734 - CD

MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF THE COURT:

NOW COME the Plaintiffs, by their undersigned counsel,  
James A. Naddeo, Esquire, and hereby move this Honorable Court  
for a continuance of the Status Conference and sets forth as  
follows:

1. That an Order was entered on April 26, 2007  
directing a Status Conference be held in the Clearfield County  
Courthouse, Judge Ammerman's Chambers, Clearfield, Pennsylvania  
on the 29<sup>th</sup> day of May, 2007, at 10:30 o'clock a.m.

2. That Plaintiffs' counsel, James A. Naddeo,  
Esquire, has a conflict with said date and time which coincides  
with previously scheduled depositions involving three deponents  
and multiple attorneys, two of whom are traveling from  
Pittsburgh.

3. That to reschedule the depositions referred to in  
Paragraph 2 would unreasonably burden the parties to that  
litigation as well as their respective counsel.

WHEREFORE, counsel for Plaintiffs respectfully request  
that the Status Conference be continued by the Court.

Respectfully submitted,  
NADDEO & LEWIS, LLC

By James A. Naddeo  
James A. Naddeo, Esquire  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMBOLA,  
Plaintiffs,

v.

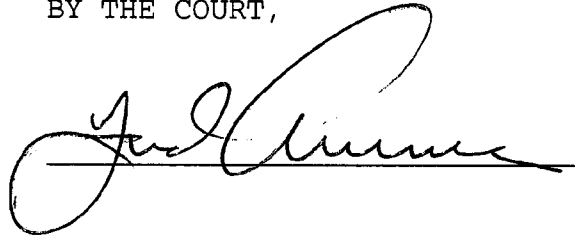
LUCY RANGLES,  
Defendant.

No. 05 - 01734 - CD

O R D E R

AND NOW, this 3 day of May, 2007, it is the  
ORDER of this Court that a Status Conference is scheduled for  
the 5<sup>th</sup> day of June, 2007, at 11:00 A.m. in Courtroom  
No. 1, Clearfield County Courthouse, Clearfield,  
Pennsylvania.

BY THE COURT,



**FILED** ICC Atty  
9/10:35 am Naddeo  
MAY 04 2007 (EK)

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

MAY 04 2007

DATE: 5-4-2007

☒ You are responsible for serving all appropriate parties.

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

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

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

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

William A. Shaw  
Prothonotary/Clerk of Courts

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

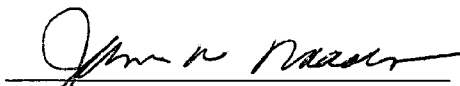
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of the Motion for Continuance and Order filed in the above-captioned case was served on the following and in the following manner on the 7th day of May, 2007:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC

  
James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**STIPULATED ORDER**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

**FILED** <sup>4cc</sup>  
01/20/07 *Atty Naddeo*  
MAY 14 2007 <sup>(CK)</sup>

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

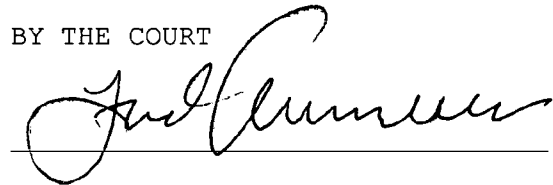
STIPULATED ORDER

AND NOW, this 11 day of May, 2007, the Court having been advised that the parties in this case, through their counsel, have stipulated as to certain deadlines for expert discovery, it is hereby ORDERED as follows:

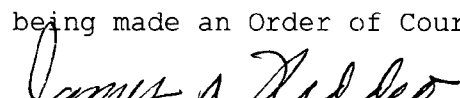
1. Plaintiffs shall produce reports of any and all physicians and/or expert witnesses to be called at trial of this case within 60 days of the date of this Order; and


2. Within 60 days of receipt of Plaintiffs' expert reports, Defendant shall identify any experts to be called at trial, and shall schedule any medical examination that will be conducted as part of Defendant's expert review in this case.

BY THE COURT



We, the undersigned, agree to and consent to the above being made an Order of Court.

  
James A. Naddeo, Esquire  
Attorney for Plaintiffs

  
Katherine V. Oliver, Esquire  
Attorney for Defendant



FILED

MAY 14 2007

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 5/14/07

☒ You are responsible for serving all appropriate parties.  
\_\_\_\_ The Prothonotary's office has provided service to the following parties:  
\_\_\_\_ Plaintiff(s) \_\_\_\_ Plaintiff(s) Attorney \_\_\_\_ Other  
\_\_\_\_ Defendant(s) \_\_\_\_ Defendant(s) Attorney  
\_\_\_\_ Special Instructions:

49

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANDLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED *no cc*  
MAY 17 2007  
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William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

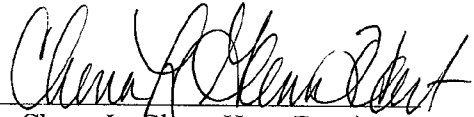
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Court's Stipulated Order dated May 11, 2007 in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 16<sup>th</sup> day of May, 2007, to the attorney(s) of record:

James A. Naddeo, Esquire  
207 East Market Street  
Clearfield, PA 16830

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Chena L. Glenn-Hart, Esquire

I.D. No. 82750

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

68

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

JOSEPH W. RUMFOLA and BRENDA D. RUMFOLA, \*  
Plaintiffs \*

vs.  
LUCY RANGLES,

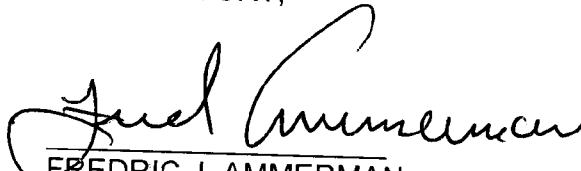
Defendant \*

NO. 05-1734-CD

ORDER

NOW, this 23<sup>rd</sup> day of May, 2007, the Court noting the Stipulated Order signed by this Court on May 11, 2007; it is the ORDER of this Court that the status conference scheduled for June 5, 2007 at 11:00 a.m. be and is hereby canceled.

BY THE COURT,

  
FREDRIC J. AMMERMAN  
President Judge

FILED  
0110:42501  
MAY 25 2007

cc: Atty's:  
added  
Oliver's

William A. Shaw  
Prothonotary/Clerk of Courts

ER

**FILED**

**MAY 25 2007**

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 5/25/07

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

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

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

\_\_\_\_ Defendant(s)    X Defendant(s) Attorney

\_\_\_\_ Special Instructions:

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANDLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** No CC.  
m/11: 28 um  
JUL 11 2007 (um)

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

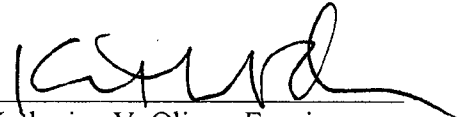
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 10<sup>th</sup> day of July, 2007, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **CERTIFICATE PREREQUISITE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

FILED <sup>NO</sup> CC  
JUL 13 2007

William A. Shaw  
Prothonotary/Clerk of Courts



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE**  
**PREREQUISITE TO SERVICE OF SUBPOENAS**  
**PURSUANT TO RULE 4009.22**

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

- 1) a notice of intent to serve subpoenas with a copy of the subpoenas attached thereto were mailed or delivered to the party at least twenty days prior to the date on which the subpoenas are sought to be served,
- 2) a copy of the notice of intent, including the proposed subpoenas, are attached to this certificate,
- 3) Plaintiffs' attorney has waived the 20-day objection period; and
- 4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: July 12, 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

Defendant intends to serve subpoenas identical to those attached to this notice to Joseph T. Joseph, M.D. and Mark Piasio, M.D. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: July 10, 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: Mark Piasio, M.D.  
Attention: Medical Records Custodian  
East Allegheny Center  
145 Hospital Avenue, Suite 311  
DuBois, PA 15801

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

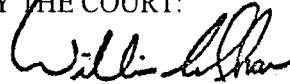
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



*LM*

William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: July 11, 2007

**DOCUMENTS TO BE PRODUCED**

Any and all records from December 21, 2005 to present regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *Joseph T. Joseph, M.D.*  
*Attention: Medical Records Custodian*  
*1466 North Hermitage Road*  
*Hermitage, PA 16148*

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

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

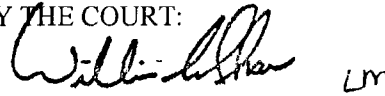
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: July 11, 2007

**DOCUMENTS TO BE PRODUCED**

Any and all records from August 15, 2006 to present regardless of treating physician on Brenda D. Rumfola, (DOB: 10/17/1962), including but not limited to, treatment invoices and/or payment ledgers, treatment notes, reports, history/physical examination, progress notes, laboratory reports, x-ray/CT scan/MRI reports, consultation reports, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prognosis for future care and treatment, prescription records, any and all correspondence pertaining to Brenda D. Rumfola's health status (regardless of source), etc.

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD


**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoenas Directed to Joseph T. Joseph, M.D. and Mark Piasio, M.D. in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 12<sup>th</sup> day of July, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED** *No cc*  
*m/10:4/2007*  
**AUG 08 2007** *LSM*

William A. Shaw  
Prothonotary/Clerk of Courts



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Lucy Randles' Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 7<sup>th</sup> day of August, 2007, to the attorneys/parties of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: **CERTIFICATE PREREQUISITE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** NO  
m/12:3807 CC  
AUG 13 2007 GR

William A. Shaw  
Prothonotary/Clerk of Courts

Dated: August 10, 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.


No. 2005-01734-CD

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

Defendant intends to serve subpoenas identical to those attached to this notice to Clearfield Hospital, DuBois Regional Medical Center and DuBois Magnetic Imaging Center. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I. D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Attorneys for Defendant

Dated: August 7, 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: Clearfield Hospital  
Attention: Medical Records Custodian  
809 Turnpike Avenue  
Clearfield, PA 16830

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *Any and all scans and/or films pertaining to Brenda D. Rumfola, D.O.B. 10/17/52, including but not limited to: right knee/left knee films dated 12/1/03 and left knee films dated 10/6/05.*

at: McQuaide Blasko Law Offices, 811 University Drive, State College, PA, 16801

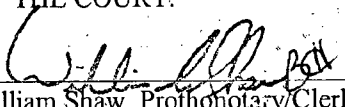
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: Katherine V. Oliver, Esquire  
ADDRESS: 811 University Drive, State College, PA 16801  
TELEPHONE: (814) 238-4926  
SUPREME CT ID#: 77069  
ATTORNEY FOR: Defendant

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 8/8/07

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  
CIVIL ACTION - LAW

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *DuBois Regional Medical Center*  
*Attention: Medical Records Custodian*  
*100 Hospital Avenue*  
*DuBois, PA 15801*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *Any and all scans and/or films pertaining to Brenda D. Rumfola, D.O.B. 10/17/52, including but not limited to: left knee films dated 4/2/04 and right knee/left knee films dated 7/27/06.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*


You may deliver or mail legible copies of the documents or produce things 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 ordering compelling you to comply with it.

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:

  
William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 8/8/07

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  
CIVIL ACTION - LAW

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

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

TO: *DuBois Magnetic Imaging Center*  
*Attention: Medical Records Custodian*  
*104 Hospital Avenue*  
*DuBois, PA 15801*

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: *Any and all scans and/or films pertaining to Brenda D. Rumfola, D.O.B. 10/17/52, including but not limited to: MR imaging of left knee dated 8/4/06.*

at: *McQuaide Blasko Law Offices, 811 University Drive, State College, PA 16801*

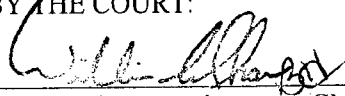
You may deliver or mail legible copies of the documents or produce things by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek, in advance, the reasonable cost of preparing the copies or producing the things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

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

NAME: *Katherine V. Oliver, Esquire*  
ADDRESS: *811 University Drive, State College, PA 16801*  
TELEPHONE: *(814) 238-4926*  
SUPREME CT ID#: *77069*  
ATTORNEY FOR: *Defendant*

BY THE COURT:



William Shaw, Prothonotary/Clerk  
Civil Division  
[Seal of the Court]

Dated: 8/8/07

**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  
CIVIL ACTION - LAW

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANDLES,

Defendant.

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No. 2005-01734-CD

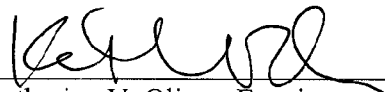
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoenas Directed to Clearfield Hospital, DuBois Regional Medical Center and DuBois Magnetic Imaging Center in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 10<sup>th</sup> day of August, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant



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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**CERTIFICATE OF SERVICE**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

Dated: September 10, 2007

**FILED** No CC.  
9/11/00 am  
SEP 10 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of the Interrogatories Addressed to Defendants (Set Two) filed in the above-captioned case was served on the following and in the following manner on the 7th day of September, 2007:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC



James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. FUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED** NO  
10/10/2007 cc  
OCT 10 2007  
(LH)

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

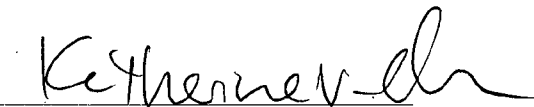
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Objections and Answers to Interrogatories  
Addressed to Defendant (Set II) in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail,  
postage prepaid, on this 8<sup>th</sup> day of October, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

UA

[illegible]

No. 05 - 1734 - CD

Type of Pleading:

Filed on behalf of:  
Plaintiffs

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

**FILED**  
OCT 15 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA  
and BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

RULE

AND NOW, this 18 day of October, 2007, upon consideration Motion to Compel filed on behalf of Plaintiffs, it is hereby ORDERED that a Rule be granted upon the Defendant to show cause why the relief requested by Plaintiffs should not be granted.

Rule Returnable and argument thereon to be held the 15<sup>th</sup> of November, 2007, at 2:00 P.m., in Courtroom 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

BY THE COURT,

  
\_\_\_\_\_  
Judge

**FILED** <sup>1cc</sup>  
010:3854 Atty Naddeo  
OCT 19 2007

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

OCT 19 2007

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 10/19/07

☒ You are responsible for serving all appropriate parties.

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

☐ Plaintiff(s) ☐ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) ☐ Defendant(s) Attorney

☐ Special Instructions:

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

JOSEPH W. RUMFOLA  
and BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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No. 05 - 1734 - CD

MOTION TO COMPEL

NOW COME THE PLAINTIFFS, JOSEPH W. RUMFOLA and BRENDA D. RUMFOLA, and by and through their attorney, request this Court to enter an Order under Pa.R.C.P. 4003.5(a)(2) directing defendant to provide answers to plaintiffs' expert witness interrogatories and in support thereof avers as follows:

1. This action was commenced by plaintiffs for injuries sustained to Plaintiff, Brenda D. Rumfola, in an automobile accident.

2. Upon the request of defendant, Plaintiff, Brenda D. Rumfola, was evaluated by Dr. Jeffrey Kann who conducted an independent medical examination and authored a report based upon the same.

3. On or about September 7, 2007, plaintiffs served expert interrogatories upon defendant.

4. Defendant has objected generally to the majority of plaintiffs' expert interrogatories and is thereby refusing to



answer the same. A true and correct copy of defendant's *Objections and Answers to Interrogatories Addressed to Defendant (Set Two)* is attached hereto as Exhibit "A."

5. That defendant's objections are based upon an allegation that plaintiffs have failed to show good cause, have failed to follow appropriate procedure for discovery, that the scope of the interrogatories exceeds that provided for under the rules, and that the interrogatories are overly burdensome and intrusive upon defendant.

6. That plaintiffs have reasonable cause to show that defendant's expert, Dr. Jeffrey Kann, has entered the professional witness category.

7. That the recent Pennsylvania Supreme Court decision of Cooper v. Schoffstall, 588 Pa. 505 (Pa. 2006) affords plaintiffs the right to inquire as done so in plaintiffs' expert interrogatories.

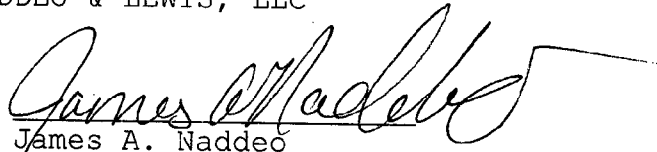
8. That pursuant to the Cooper v. Schoffstall decision plaintiffs are entitled to have the expert interrogatories answered.

WHEREFORE, Plaintiffs respectfully request your Honorable Court issue a rule upon defendant to show cause why this Court should not enter an order dismissing defendant's objections to plaintiffs' expert interrogatories and direct defendant to answer the same.

Respectfully Submitted,

NADDEO & LEWIS, LLC

By

A handwritten signature in black ink, appearing to read "James A. Naddeo", written over a horizontal line.

James A. Naddeo

Attorney for Plaintiffs

JUL 10 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**OBJECTIONS AND ANSWERS TO INTERROGATORIES**  
**ADDRESSED TO DEFENDANT (SET TWO)**

**GENERAL OBJECTIONS**

Defendant objects to Plaintiffs' Interrogatories addressed to Defendant (Set Two) on the basis that the Interrogatories seek information beyond that required and permitted under the Pennsylvania Rules of Civil Procedure, specifically Pa.R.C.P. 4003.5. Plaintiffs have not made, or even proffered, the required showing of good cause that is a necessary prerequisite under Pa.R.C.P. 4003.5 to Plaintiffs' Interrogatories seeking financial and other information from Dr. Kann. Defendant further objects on the basis that Plaintiffs have failed to follow appropriate procedure for discovery of information beyond that expressly provided for under Pa.R.C.P. 4003.5, and because the scope of the Interrogatories submitted by Plaintiffs exceed that provided for under the applicable rules and case law in any event. Furthermore, the Interrogatories are overly burdensome and intrusive, and would require an unreasonable investigation and result in undue burden and expense to Defendant.

Defendant's decision to provide information notwithstanding the objectionable nature of any of the definitions or instructions, or of the interrogatories themselves, should not be construed as: (1) a stipulation that the information requested is relevant; or (2) a waiver of the General Objections or the objections asserted in response to specific interrogatories.

Exhibit<sup>1</sup> "A"

  
Katherine V. Oliver, Esquire

1. Please describe the type and amount of compensation that Dr. Jeffrey Kann (your expert and IME physician) has received and is expected to receive from you for his services in this case.

**ANSWER:**

**Dr. Kann's fee for performing an Independent Medical Examination of Brenda Rumfola and reviewing and analyzing Mrs. Rumfola's records and radiology films was \$2,100.00.**

2. Please describe the character of your expert witness, Dr. Jeffrey Kann's, litigation-related activities and so state:

A. What percentage of his medical practice and work is devoted to patients involved in litigation? Please state this percentage for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

  
Katherine V. Oliver, Esquire

**Subject to and without waiving those objections, for the years 2005, 2006 and 2007, Defendant understands that Dr. Kann's best estimate, based on information available, is approximately 1%.**

B. What percentage of your answer to question 2A above, that is of the litigation cases/patients Dr. Jeffrey Kann is treating, what percentage is he serving as an independent medical examiner (IME) for defendants? Please so state the same for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

  
**Katherine V. Oliver, Esquire**

**Subject to and without waiving those objections, for the years 2005, 2006 and 2007, the best estimate based on available information is 80%-85%.**

- C. What percentage of your answer to question 2B above, that is of the litigation cases/patients, Dr. Jeffrey Kann is serving as an IME physician, what percentage are on behalf of the defendant and/or the insurer represented in this particular case? Please so state for the same for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that: (i) the Interrogatory, in seeking information about the independent medical examinations performed on behalf of particular insurers, goes beyond the discovery permitted by law even in these cases where the requisite showing of good cause is shown; (ii) because responding to the Interrogatory to the extent it would even be possible, would require an unreasonable investigation and result in undue expense; and, (iii) because the Interrogatory seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence. Finally, Defendant objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

  
**Katherine V. Oliver, Esquire**

**Subject to and without waiving these objections, Dr. Kann has never performed an independent medical examination on behalf of Mrs. Randles.**

- D. Please state the approximate and total amount of income each year, for the past three years (2007 - year-to-date, 2006, 2005, 2004), garnered from the performance of serving as an expert (in any capacity) in litigation

cases.  
**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory seeks to require an investigation and production of information beyond that permitted by law even in those cases where the requisite showing of good cause has been shown, and because attempting to respond to the Interrogatory would result in undue burden and expense. Moreover, Dr. Kann practices with other physicians, and Defendant understands that he does not have information readily accessible that would permit a reasonable estimate in response to this inquiry.**

  
**Katherine V. Oliver, Esquire**

- E. Please state the approximate and total amount of income each year, for the past three years (2007 - year-to-date, 2006, 2005, 2004), garnered from the performance of serving as an expert (in any capacity) in litigation cases where Dr. Jeffrey Kann's performance was on behalf of a defendant or defendants.

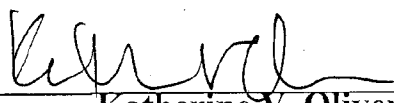
**ANSWER:**

**Please see objections and response to 2(D), above, incorporated herein by reference.**

- F. Please state the approximate and total amount of income each year, for the past three years (2007 - year-to-date, 2006, 2005, 2004), garnered from the performance of serving as an expert (in any capacity) in litigation cases where Dr. Jeffrey Kann's performance was on behalf of McQuaide Blasko.

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

  
**Katherine V. Oliver, Esquire**

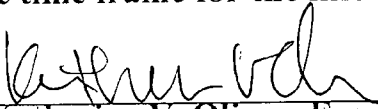
**Subject to and without waiving these objections, for the years 2005, 2006 and 2007, Defendant understands that Dr. Kann might**

have performed a medical examination on one other occasion at the request of a lawyer at McQuaide Blasko. The fees earned for this work is not known.

- G. Please state the total number of independent medical examinations performed for defendants (i.e. any defendant) each year by Dr. Jeffrey Kann for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.

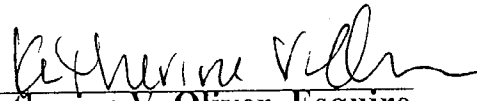
  
Katherine V. Oliver, Esquire

Subject to and without waiving these objections, for the years 2005, 2006 and 2007, Defendant understands that the best estimate of total IME's performed is approximately two independent medical examinations per week.

- H. Please state the total number of independent medical examinations performed for the specific defendant/insurer in this particular case by Dr. Jeffrey Kann for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

See answer and objections to Interrogatory No. 2(C) above.

  
Katherine V. Oliver, Esquire

- I. Please state the total number of independent medical examinations performed by Dr. Jeffrey Kann for the McQuaide Blasko law firm for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information

sought.

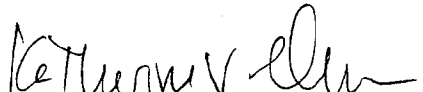
  
Katherine V. Oliver, Esquire

Subject to and without waiving these objections, for the years 2005, 2006 and 2007, Defendant understands that Dr. Kann performed one other medical examination at the request of an attorney from McQuaide Blasko law firm within the years 2005, 2006 and 2007 to date.

- J. Please state the total number of instances that Dr. Jeffrey Kann has provided testimony on behalf of a defendant or defendants (i.e. any defendant) for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

See General Objections above, incorporated herein by reference. Defendant also objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought. Defendant further objects on the basis that this Interrogatory seeks to require an investigation and production of information beyond that permitted by law even in those cases where the requisite showing of good cause has been shown, and because attempting to respond to the Interrogatory would result in undue burden and expense.

  
Katherine V. Oliver, Esquire

Subject to and without waiving these objections, Defendant understands that Dr. Kann has testified approximately 50 times per year in the years 2005 through 2007, and that Dr. Kann does not have sufficient information to ascertain whether the testimony was at the request of a defendant or a plaintiff/claimant.

- K. Please state the total number of instances that Dr. Jeffrey Kann has provided testimony on behalf of the defendant or insurer involved in this particular case for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

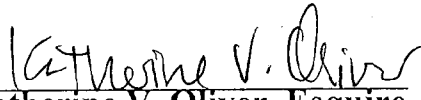
Please see answer and objection to 2(C), incorporated herein by reference.



- L. Please state the total number of instances that Dr. Jeffrey Kann has provided testimony on behalf of McQuaide Blasko law firm for each of the past three years (2007 - year-to-date, 2006, 2005, 2004).

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

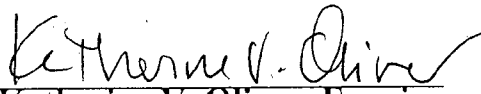
  
Katherine V. Oliver, Esquire

**Subject to and without waiving these objections, Defendant understands that Dr. Kann testified in one other matter at the request of an attorney with McQuaide Blasko Law Offices.**

- M. Please state what percent of Dr. Jeffrey Kann's total work hours are devoted to treating his own patients (not IME).

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory seeks to require an investigation and production of information beyond that sanctioned by law even in those cases where the requisite showing of good cause has been shown, and because attempting to respond to the Interrogatory would result in undue burden and expense.**

  
Katherine V. Oliver, Esquire

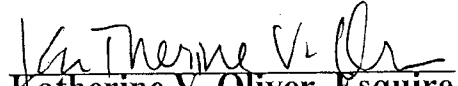
**Subject to and without waiving these objections, Defendant understand this to be more than 90%.**

- N. Please state what percent of Dr. Kann's total work hours are devoted to treating or examining IME patients.

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information**

sought.

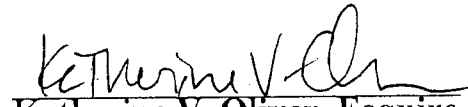
  
Katherine V. Oliver, Esquire

**Subject to and without waiving these objections, for the years 2005, 2006 and 2007, Defendant understands Dr. Kann's best estimate is less than 10%.**

- O. For each of the following years, please state the total number of patients Dr. Kann has treated (both regular and IME).
- i. 2007 - year-to-date:
  - ii. 2006:
  - iii. 2005:
  - iv. 2004:

**ANSWER:**

**See General Objections above, incorporated herein by reference. Defendant further objects on the basis that this Interrogatory is overly broad with respect to the time frame for the information sought.**

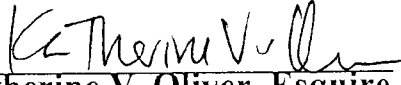
  
Katherine V. Oliver, Esquire

**Subject to and without waiving these objections, Defendant understands Dr. Kann sees approximately 180 patients per week on average.**

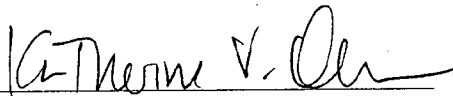
- P. For each of the following years, please state the number of patients for which Dr. Jeffrey Kann has performed independent medical examinations.
- i. 2007 - year-to-date:
  - ii. 2006:
  - iii. 2005:
  - iv. 2004:

**ANSWER:**

**See answer and objections to Interrogatory No. 2(G),  
incorporated herein by reference.**

  
**Katherine V. Oliver, Esquire**

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:   
Katherine V. Oliver, Esquire  
I.D. No. 77069  
James M. Horne, Esquire  
I.D. No. 26908  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Dated: October 8, 2007

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**CERTIFICATE OF SERVICE**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

Dated: October 23, 2007

**FILED** NO CC  
OCT 23 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

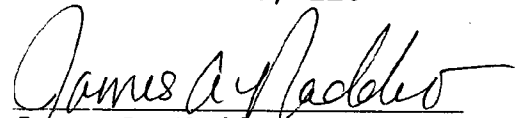
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a  
certified copy of Motion to Compel filed in the above-captioned  
case was served on the following and in the following manner on  
the 22nd day of October, 2007:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC



James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiff,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**DEFENDANT'S RESPONSE TO  
PLAINTIFFS' MOTION TO COMPEL**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED** *no cc*  
*m/jl:22/07*  
OCT 31 2007 *(ck)*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**DEFENDANT'S RESPONSE TO PLAINTIFFS'**  
**MOTION TO COMPEL**

AND NOW, comes Defendant, Lucy Randles, by and through her undersigned counsel, McQuaide, Blasko, Fleming & Faulkner, Inc., and files the following Response to Plaintiffs' Motion to Compel:

1. Admitted in part and denied in part. It is admitted that Plaintiffs filed this action claiming injuries and damages sustained by Plaintiff Brenda D. Rumfola in an automobile accident. It is denied that Plaintiff sustained the injuries and damages claimed.

2. Admitted. By way of further response, the examination took place on September 10, 2007. A copy of Dr. Kann's report was timely provided to Plaintiffs' attorney.

3. Admitted. By way of further response, Plaintiffs' expert interrogatories do not request information pertaining to the opinions of any experts to be called at trial, which information is discoverable as of right under Pa. R.C.P. 4003.5. This information has already been exchanged. Rather, Plaintiffs' expert interrogatories request information pertaining to Dr. Kann's personal finances and details of his work in performing independent medical examinations and providing testimony over the course of an approximate four year period (2004,

2005, 2006 and 2007 to date). The majority of Plaintiffs' interrogatories seek detailed information pertaining to Dr. Kann's services for litigants generally (as opposed to his services in this particular case), including information that is not maintained by Dr. Kann or otherwise available.

4. Denied as stated. It is expressly denied that Defendant has refused to answer the interrogatories served by Plaintiff. To the contrary, although Defendant has asserted proper and timely objections to Plaintiffs' interrogatories for the sake of preserving the same, Defendant has also conducted an investigation to ascertain what information is available, and has provided answers to the interrogatories to the extent that information is available. Please see Defendant's objections and answers to interrogatories addressed to Defendant (Set Two), attached to Plaintiffs' Motion as Exhibit "A." In limited circumstances, Defendant has noted that the information Plaintiffs request concerning Dr. Kann, who works with many other physicians in a group practice, is not available. Without waiving her objections to these inquiries, Defendant has investigated the same and appropriately responded that the information is not available, because the information is not maintained in a fashion that would permit a response specific to Dr. Kann.

5. Admitted in part and denied in part. It is admitted that paragraph 5 of Plaintiffs' Motion paraphrases, in part, the objections served by Defendant. It is denied that Plaintiff fully and completely recites the objections served by Defendant. By way of further response, Defendant's objections and answers, being within a written document of record, speak for themselves. Defendant's objections are proper and well-founded.

6. Denied. Under the precedent cited by Plaintiffs themselves, Plaintiffs must, as a prerequisite to seeking supplemental expert discovery of the nature at issue, come forth and demonstrate reasonable grounds for believing that Dr. Kann has entered the "professional witness



category.” See Cooper v. Schoffstall, 905 A.2d 482 (Pa. 2006). Plaintiffs have not made any such demonstration to Defendant and/or this Court.

7. Denied. It is denied that the Pennsylvania Supreme Court decision of Cooper v. Schoffstall, 905 A.2d 482 (Pa. 2006) permits Plaintiffs the right to make the inquiries as set forth within their interrogatories. To the contrary, after the requisite showing of cause is made, the Cooper case permits only very limited discovery, in a limited format, as further set forth in the Supreme Court’s opinion. For example, even in cases where cause is shown, the Cooper decision does not authorize interrogatories requiring an expert to provide a breakdown of past services to specific insurers, and does not authorize discovery of financial and/or past litigation services issues beyond a three year period. In the case at bar, Plaintiffs have failed to proffer any evidence to support their claims of cause, have failed to follow the proper procedure in serving their supplemental expert discovery, and have failed to properly limit the scope and nature of the interrogatories served in the manner required by Cooper. Despite Plaintiffs’ failures, Defendant has filed timely and appropriate responses to Plaintiffs’ discovery requests in what has become a futile attempt to avoid unnecessary time and expense to the parties and the Court in litigating this collateral issue.

8. Denied, based on the objections filed of record, and for the reasons set forth above. By way of further response, under the circumstances of this case, Defendant has not only fully complied with, but has far exceeded, her obligations under Pennsylvania law with respect to the interrogatories seeking expert financial information served by Plaintiffs.

---

Wherefore, Defendant respectfully requests that this Honorable Court enter an Order denying Plaintiffs' Motion to Compel.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

Dated: October 30, 2007

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

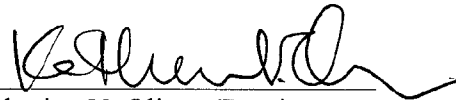
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Response to Plaintiffs' Motion to Compel in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 30<sup>th</sup> day of October, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I. D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED**  
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NOV 14 2007

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

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Brief in Opposition to  
Plaintiffs' Motion to Compel in the above-captioned matter was hand delivered, on this 14<sup>th</sup> day  
of November, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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

JOSEPH RUMFOLA and BRENDA D. RUMFOLA,  
Husband and Wife,

Plaintiffs

vs.

LUCY RANGLES,

Defendant

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NO. 05-1734-CD

ORDER

NOW, this 19<sup>th</sup> day of November, 2007, following argument on the Plaintiffs' Motion to Compel filed October 15, 2007 with the Court hereby making a finding of a proper showing of cause that would permit supplemental expert discovery, it is the ORDER of this Court that in regard to the Defendant's expert Dr. Jeffrey N. Kann that the Defense provide the following information to the Plaintiff within no more than twenty (20) days from this date:

1. The approximate amount of compensation received and expected to be paid to Dr. Kann in the case at bar;
2. The character of Dr. Kann's litigation related activities, and, in particular the approximate percentage devoted by him to personal injury litigation on behalf of defendants in general and as provided to the law firm of McQuade Blasko for the three years commencing with September of 2004;
3. The number of independent medical examinations performed by Dr. Kann in each year for the past three years from September of 2004;

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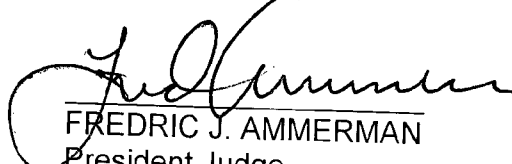
William A. Shaw  
Prothonotary/Clerk of Courts

1cc Amy: Nadeo

Oliver & Horne

4. The number of instances in which Dr. Kann has provided expert medical testimony during the last three years as aforesaid;
5. The approximate portion of Dr. Kann's overall professional work devoted to litigation related services on behalf of both plaintiffs and defendants for the past three years; and
6. The approximate amount of income received by Dr. Kann each year for the last three years which was garnered from the performance of professional work devoted to litigation related services.

BY THE COURT,



FREDRIC J. AMMERMAN  
President Judge

FILED

NOV 20 2007

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 11/20/07

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

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

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

\_\_\_\_ Defendant(s) X Defendant(s) Attorney

\_\_\_\_ Special Instructions:



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**  
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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**  
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: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** *No CC*  
*m/10:42/3d*  
DEC 11 2007 *(S)*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

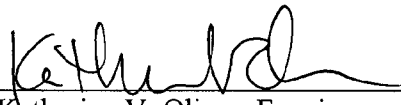
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Responses to Plaintiffs' Expert Interrogatories in Accordance with the Court Order of November 19, 2007 in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 10<sup>th</sup> day of December, 2007, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

FILED

DEC 11 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**CERTIFICATE OF SERVICE**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

**FILED** *NO CC*  
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**DEC 31 2007**  
*WTS*

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of Interrogatories Addressed to Defendants (set three) filed in the above-captioned case was served on the following and in the following manner on the 22nd day of October, 2007:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC



James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

No. 05 - 1734 - CD

Type of Pleading:

**AMENDED CERTIFICATE OF  
SERVICE**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Naddeo & Lewis, LLC  
James A. Naddeo, Esquire  
207 East Market Street  
PO Box 552  
Clearfield, PA 16830  
(814) 765-1601

FILED <sup>NO</sup>  
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William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

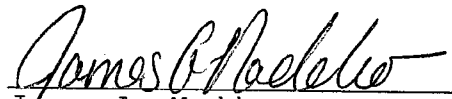
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and correct copy of Interrogatories Addressed to Defendants (set three) filed in the above-captioned case was served on the following and in the following manner on the 22nd day of January, 2008:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC



James A. Naddeo  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

FILED <sup>no</sup> cc  
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FEB 08 2008

William A. Shaw  
Prothonotary/Clerk of Courts



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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANDLES,

Defendant.

No. 2005-01734-CD

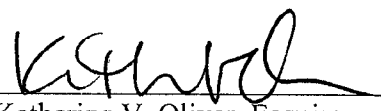
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Responses to Plaintiffs' Interrogatories (Set Three) in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 7th day of February, 2008, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

UA

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD

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: TYPE OF PLEADING:  
: **PRAECIPE TO LIST FOR TRIAL**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** NO CC  
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APR 22 2008 (C)

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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**PRAECIPE TO LIST FOR TRIAL**

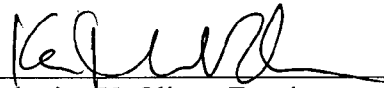
TO THE PROTHONOTARY:

Please place the above-captioned matter on the next available trial list. I hereby certify as follows:

- (1) This matter has been at issue more than 20 days;
- (2) Discovery has been completed;
- (3) There are no currently pending pre-trial motions;
- (4) The matter is not subject to compulsory arbitration; and
- (5) The matter is to be heard before a jury.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Dated: April 21, 2008

Attorneys for Defendant

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Praeipce to List for Trial in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 21<sup>st</sup> day of April, 2008, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

CA

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

JOSEPH W. RUMFOLA and BRENDA D. RUMFOLA, \*  
Plaintiffs \*

vs. \*

LUCY RANGLES, \*  
Defendant \*

NO. 05-1734-CD

**ORDER**

AND NOW, this 29th day of April, 2008, it is the ORDER of this Court that the Pre-Trial Conference in the above matter shall be held on the **19<sup>th</sup> day of May, 2008, at 9:30 a.m. in Chambers.**

Jury Selection in this matter is scheduled for July 24, 2008 in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

BY THE COURT,



FREDRIC J. AMMERMAN  
President Judge

**FILED**

04:00 PM  
APR 29 2008

William A. Shaw  
Prothonotary/Clerk of Courts

1cc Arty:  
Horne  
Oliver  
Naddeo  
(62)

FILED

APR 29 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 4/29/08

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

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

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

\_\_\_\_ Defendant(s) X Defendant(s) Attorney

\_\_\_\_ Special Instructions:

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

TYPE OF PLEADING:  
**CERTIFICATE OF SERVICE**

TYPE OF CASE: CIVIL  
FILED ON BEHALF OF:  
**DEFENDANT**

COUNSEL OF RECORD FOR  
FOR THIS PARTY:  
KATHERINE V. OLIVER, ESQ.  
I.D. NO. 77069  
JAMES M. HORNE, ESQ.  
I.D. NO. 26908  
McQUAIDE, BLASKO, FLEMING  
& FAULKNER, INC.  
811 University Drive  
State College, PA 16801  
PH# (814) 238-4926

**FILED**  
MAY 12 2008  
no cc  
LM

William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

No. 2005-01734-CD

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Pre-Trial Memorandum in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 12<sup>th</sup> day of May, 2008, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant



CA

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,  
Plaintiffs

vs.

LUCY RANGLES,  
Defendant

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NO. 05-1734-CD

ORDER

NOW, this 19<sup>th</sup> day of May, 2008, 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 July 24, 2008 commencing at 9:00 a.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania.
2. Jury Trial is hereby scheduled for October 27 and 28, 2008 commencing at 9:00 a.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania
3. All depositions which are to be used for trial presentation purposes shall be completed by absolutely no later than ninety (90) days prior to the commencement of trial or the same will not be available for use at trial. A copy of the transcript of any such deposition(s) shall be provided to opposing counsel within no more than twenty (20) days following completion of the deposition(s).
4. The written report of any expert who will testify at trial which has not previously been provided to opposing counsel shall be delivered within no more than sixty (60) days from this date. Failure to comply will result in the witness not being available for use at trial.

**FILED**

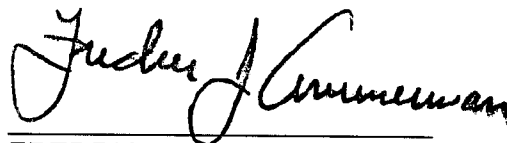
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ICC Atty Noelleo  
ICC Atty Oliver & Horne

William A. Shaw  
Prothonotary/Clerk of Courts

5. Any party making objections relative the testimony to be provided by any witness in the form of a deposition at the time of trial shall submit said objections to the Court, in writing, no later than forty-five (45) 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 file an Answer thereto and submit its brief in opposition to said objections no later than thirty (30) days prior to the commencement of trial.
6. 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 forty-five (45) 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 thirty (30) days prior to trial.

BY THE COURT,

A handwritten signature in black ink, reading "Fredric J. Ammerman". The signature is written in a cursive style with a large, stylized initial "F".

FREDRIC J. AMMERMAN  
President Judge

FILED

MAY 22 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 5/22/08

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

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

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

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

\_\_\_\_ Special Instructions:

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

v.

LUCY RANGLES,

Defendant.

: No. 2005-01734-CD  
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:  
: TYPE OF PLEADING:  
: **CERTIFICATE OF SERVICE**

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: TYPE OF CASE: CIVIL  
: FILED ON BEHALF OF:  
: **DEFENDANT**

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:  
: COUNSEL OF RECORD FOR  
: FOR THIS PARTY:  
: KATHERINE V. OLIVER, ESQ.  
: I.D. NO. 77069  
: JAMES M. HORNE, ESQ.  
: I.D. NO. 26908  
: McQUAIDE, BLASKO, FLEMING  
: & FAULKNER, INC.  
: 811 University Drive  
: State College, PA 16801  
: PH# (814) 238-4926

**FILED** <sup>no</sup> <sub>cc</sub>  
JUN 12 3:35 PM '08  
William A. Shaw  
Prothonotary/Clerk of Courts

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs,

vs.

LUCY RANGLES,

Defendant.

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No. 2005-01734-CD

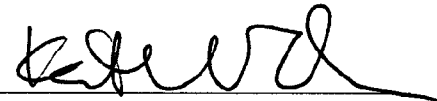
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Notice of Taking Videotaped Deposition in the above-captioned matter was mailed by U.S. 1<sup>st</sup> Class Mail, postage prepaid, on this 6<sup>th</sup> day of June, 2008, to the attorney of record:

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

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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



Katherine V. Oliver, Esquire

I.D. No. 77069

James M. Horne, Esquire

I.D. No. 26908

811 University Drive

State College, PA 16801

(814) 238-4926

Attorneys for Defendant

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JUL 09 2008 Amy Naddes  
William A. Shaw  
Notary Public/Clerk of Courts (60)

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

JOSEPH W. RUMFOLA  
And BRENDA D. RUMFOLA,  
Husband and wife,  
Plaintiffs,

v.

LUCY RANGLES,  
Defendant.

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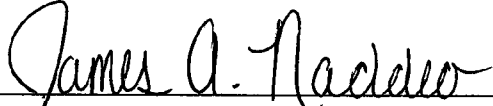
No. 05 - 1734 - CD

**PRAECIPE TO SETTLE AND DISCONTINUE**

TO THE PROTHONOTARY:

Please mark the above-captioned case settled and  
discontinued.

Naddeo & Lewis, LLC

  
James A. Naddeo, Esquire  
Attorney for Plaintiffs

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

JOSEPH W. RUMFOLA and  
BRENDA D. RUMFOLA,

Plaintiffs

v.

LUCY RANGLES,  
Defendant

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No. 05-1734-CD

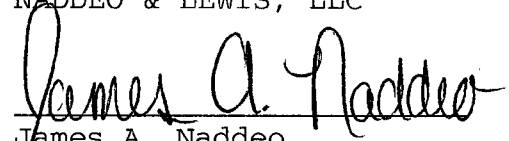
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a  
certified copy of Praecipe to Settle and Discontinue filed in the  
above-captioned case was served on the following and in the  
following manner on the 9<sup>th</sup> day of July, 2008:

First-Class Mail, Postage Prepaid

Katherine V. Oliver, Esquire  
McQuaide Blasko Law Offices  
811 University Drive  
State College, PA 16801-6699

NADDEO & LEWIS, LLC



James A. Naddeo  
Attorney for Plaintiffs



COPY

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Joseph W. Rumfola  
Brenda D. Rumfola

Vs.  
Lucy Randles

No. 2005-01734-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 July 9, 2008, marked:

Settled and Discontinued

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

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of July A.D. 2008.



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William A. Shaw, Prothonotary