

Velma Francisko vs Estate of Andrew A et al
2006-143-CD

06-143-CD
Velma Francisko vs Edward
Andrasko

Civil Other

Date		Judge
1/27/2006	New Case Filed.	No Judge
	X Filing: Praecipe for Writ of Summons Paid by: Carfley, John R. (attorney for Francisko, Velma) Receipt number: 1912241 Dated: 01/27/2006 Amount: \$85.00 (Check) 2Writs to Atty Carfley.	No Judge
2/13/2006	X Praecipe For Entry of Appearance, filed. Please enter my appearance on behalf of the Plaintiff, Velma Francisko, in the above-captioned case, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
2/22/2006	X X Certificate of Service, filed. That a certified copy of Interrogatories Addresses to Defendant was served on the 22nd day of February 2006 to Mr. Edward Andrasko, filed by s/ James A. Naddeo Esq. 1CC Atty Naddeo.	No Judge
3/15/2006	X X Praecipe For Entry of Appearance, filed by Atty. Horne no cert. copies. Enter appearance of James M. Horne and Katherine V. Oliver on behalf of Edward Andrasko	No Judge
	X X Praecipe for Rule to File Complaint, filed by Atty. Horne no cert. copies. Issue Rule to file a Complaint to Atty.	No Judge
3/17/2006	X X Certificate of Service, copy of Court-issued Rule to File Complaint mailed by 1st Class Mail on the 16th day of March, 2006 to James A. Naddeo, Esquire. Filed by s/ James M. Horne, Esquire, No CC	No Judge
3/30/2006	X X Complaint, filed by s/ John Carfley Esq. 3CC Atty Carfley.	No Judge
3/31/2006	X X Amended Complaint, filed by s/ John A. Carfley Esq. 3CC Atty Carfley.	No Judge
4/3/2006	X X Certificate of Service, filed. That a true and correct copy of Defendant's Answers/Objections to Plaintiff's Interrogatories in the above-captioned matter on the 31st day of March 2006 to James A. Naddeo Esq., filed by s/ Chena L. Glenn-Hart Esq. No CC.	No Judge
4/6/2006	X X Certificate of Service, filed. That a true and correct copy of Defendant's Interrogatories (Set 1), Request for Production of Documents (Set 1), and Request for Production of Documents and Tangible Things (Set 2) directed to Plaintiff in the above-referenced matter on the 5th day of April 2006 to James A. Naddeo Esq., filed by s/ James M. Horne Esq. No CC.	No Judge
	X X Certificate of Service, filed. That a true and correct copy of Defendant's Notice of Intent to Serve Subpoenas for Production of Documents and Things in the above-referenced matter on the 5th day of April, 2006 to James A. Naddeo Esq., filed by s/ James M. Horne Esq. No CC.	No Judge
4/10/2006	X X Sheriff Return, February 16, 2006 at 8:41 am served the within Summons on Edward Andrasko. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm Shff Hawkins costs pd by Carfley \$44.41	No Judge
4/13/2006	X X Answer with New Matter filed by s/ James M. Horne Esq. No CC.	No Judge
4/27/2006	X X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ James M. Horne Esq. No CC.	No Judge
5/4/2006	X X Answer to New Matter, filed by s/ John R. Carfley Esq. 4CC to Atty.	No Judge
5/11/2006	X X Certificate of Service, filed. That a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Productions of Documents and Things in the above-referenced matter was mailed on the 10th day of May 2006 to James A. Naddeo Esq., filed by s/ James H. Horne Esq.	No Judge
6/1/2006	X X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ James M. Horne Esq. No CC.	No Judge

Current Judge: Fredric Joseph Ammerman

Ayden Shaffer-Doan, Timothy Doan, Karen Shaffers. Richard Grout MD, Sundar Chandrasekhar, DuBois Regional Medical Center, Gateway Area Medical Associates, Inc.

Medical Professional Liability Action

Date	Judge
05/13/2005	Affidavit of Service, Copy of Judge Ammerman's May 5, 2005, Scheduling Fredric Joseph Ammerman Order along with a copy of the Preliminary Objections to Plaintiff's Complaint in the above captioned case served upon Shanin Specter, Esq. and Matthew A. Casey, Esq., John W. Blasko, Esq., and Michael A. Sosnowski, Esq. Filed By Brad R. Korinski, Esq. No CC
06/02/2005	✓ Verified Return Of Service, Notice to Defendant & Complaint With Exhibits, served on Dr. Chandrasekhar on May 18, 2005. filed by s/ Timothy A. Toomey, Certified Process Server, L.R.I. NO CC
06/03/2005	✓ Answer and New Matter to Plaintiffs' Complaint, filed by s/ Michael A. Sosnowski, Esquire. No CC
06/09/2005	✓ Order, NOW, this 8th day of June, 2005, following argument on the Preliminary Objections filed on behalf of Def. DuBois Regional Med. Cntr., it is the Order: Defense has withdrawn its Preliminary Objections relative the sufficiency of the Plaintiffs' certificate of merit; The Preliminary Objections filed raising the issue of statute of limitations are dismissed without prejudice to the Def. to raise the issue in another form hereafter. BY THE COURT: /s/ Fredric J. Ammerman, Pres. Judge. 2CC Atty. Specter & Casey, 1CC Sosnowski, D. Johnson, J. Blasko, 1CC Def.
	✓ Plaintiffs' Response to New Matter of Defendant Richard Grout, M.D., filed Fredric Joseph Ammerman by s/ Matthew A. Casey, Esquire. No CC
06/13/2005	✓ Praeclipe For Entry of Appearance, filed on behalf of Sundar Chandrasekhar, M.D., Only, Filed by s/ Terry C. Cavanaugh, Esquire. No CC, Copy to C/A
06/23/2005	✓ Answer And New Matter to Plaintiffs' Complaint, filed by s/ Terry C. Cavanaugh, Esquire. No CC
07/01/2005	✓ Answer and New Matter filed by s/ David R. Johnson, Esquire. No CC
07/05/2005	✓ Response To New Matter of Defendant Sundar Chandrasekhar, M.D., filed Fredric Joseph Ammerman by Matthew A/ Casey, Esquire. 1CC to Atty
07/18/2005	✓ Response To New Matter of Defendant Sundar Chandrasekhar, M.D., filed Fredric Joseph Ammerman by s/ Matthew A. Casey, Esquire. No CC
08/29/2005	✓ Certificate of Service filed. That the Request to Plaintiffs for production of Expert Reports, in the above-referenced matter was mailed by regular mail to Shanin Specter Esq., Matthew A. Casey Esq., Terry C. Cavanaugh Esq., Michael Sosnowski Esq., David Johnson Esq., on August 26, 2005 filed by s/ John W. Blasko Esq. No CC.
09/01/2005	✓ Motion To Compel, filed by s/ David R. Johnson, Esquire. No CC
09/02/2005	✓ Request to Plaintiffs for Production of Expert Reports to Ayden Shaffer-Doan, a minor, by his parents and natural guardians Timothy Doan and Karen Shaffer, and Timothy Doan and Karen Shaffer, in their own rights, plaintiff on August 31, 2005 filed by s/ David R. Johnson Esq. No CC.
09/06/2005	✓ Motion to Compel Answers t Discovery Requests, filed by Atty. Blasko no Fredric Joseph Ammerman cert. copies. (Rule and Order attached)
09/07/2005	✓ Order, NOW, this 6th day of September, 2005, it is Ordered that argument Fredric Joseph Ammerman on defendant, DuBois Regional Medical Center's Motion to Compel is scheduled to occur on the 27th day of September, 2005 at 10:00 a.m. By The Court, /s/ Fredric J. Ammerman, Pres. Judge. 2CC Atty. Johnson

Date: 3/21/2007

Clearfield County Court of Common Pleas

User: LMILLER

Time: 11:44 AM

ROA Report

Page 2 of 2

Case: 2006-00143-CD

Current Judge: Paul E. Cherry

Velma Francisko vs. Estate of Andrew Andrasko, decedent, Edward Andrasko Jr.

Civil Other

Date	Judge
8/4/2006 ✓ <input checked="" type="checkbox"/> Certificate of Service, copy of Defendant's Notice of Deposition of Plaintiff Velma Francisko mailed by 1st Class Mail on the 2nd day of August, 2006, to James A. Naddeo, Esquire. Chena L. Glenn-Hart.	No Judge
9/18/2006 ✓ <input checked="" type="checkbox"/> Notice of Death, filed. The Death of Edward Andrasko, a party to the above action, during the pendency of this action is noted upon the record, filed by s/ Chena L. Glenn-Hart Esq. No CC.	No Judge
9/19/2006 ✓ <input checked="" type="checkbox"/> Certificate of Service, filed. That a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was made to James A. Naddeo Esq on this 18th day of September 2006, filed by s/ Chena L. Glenn-Hart Esq. NO CC.	No Judge
10/11/2006 ✓ <input checked="" type="checkbox"/> Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/ Chena L. Glenn-Hart, Esquire. No CC	No Judge
10/27/2006 ✓ <input checked="" type="checkbox"/> Notice of Substitution of Successor, filed by Chena L. Glenn-Hart Esq. No CC.	No Judge
11/1/2006 ✓ <input checked="" type="checkbox"/> Praeclipe To Amend Caption, filed by s/ John R. Carfley, Esquire. 2CC to Atty.	No Judge
	Praeclipe To Amend Caption, filed by s/ John R. Carfley, Esquire. 2CC to Atty.
11/7/2006 ✓ <input checked="" type="checkbox"/> Order, NOW, this 6th day of Nov., 2006, it is Ordered that the caption in the above matter shall be amended to read as follows: Velma Francisko	Paul E. Cherry
	Plaintiff

vs.

Estate of Edward Andrasko, decedent, c/o
Edward Andrasko, Jr., Executor
Defendant

By the Court, /s/ Paul E. Cherry, Judge. 2CC Atty. Carfley

3/7/2007 ✓ Praeclipe: Please schedule a status conference. filed by s/ James A. Naddeo, Esquire. 1CC Atty. Naddeo

Paul E. Cherry

3/9/2007 ✓ Certificate of Service, filed. That a certified copy of Praeclipe and Scheduling Order were served on James M. Horne Esq., on the 9th day of March 2007, filed by s/ James A. Naddeo Esq. 2CC Atty Naddeo.

Paul E. Cherry

✓ Order, NOW, this 8th day of March, 2007, upon consideration of the Praeclipe for Status Conference filed by James A. Naddeo, Esquire, it is Ordered that a status conference be held on the 30th day of March, 2007 at 10:15 a.m. By the Court, /s/ Paul E. Cherry, Judge. 2CC Atty. Naddeo

3-30-07 ✓ Order, dated 3-30-07

6-4-07 ✓ Praeclipe to list for Trial

6-21-07 ✓ Certificate of Service

7-2-07 ✓ Certificate Prerequisite to Service of Subpoenas Pursuant to Rule 4009.22

7-27-07 ✓ Order, dated 7-26-07

10-12-07 ✓ Order, dated 10-12-07

11-06-07 Praeclipe to set the discont.nu

Current Judge: Fredric Joseph Ammerman

Ayden Shaffer-Doan, Timothy Doan, Karen Shaffers. Richard Grout MD, Sundar Chandrasekhar, DuBois Regional Medical Center, Gateway Area Medical Associates, Inc.

Medical Professional Liability Action

Date	Judge
04/26/2005	<p>No CC filed.</p> <p>Certificate of Service, Defendant Gateway Area Medical Associates, Inc.'s No Judge Expert Interrogatories, the 25th of April, 2005 to: Shanin Spector, Esquire; Michael Sosnowski, Esquire; and David Johnson, Esquire. filed by s/ John W Blasko, Esquire. No CC</p> <p>Certificate of Service, Defendant Gateway Area Medical Associates, Inc.'s No Judge Request for Production (Set Two), the 25th of April, 2005 to: Shanin Spector, Esquire; Michael Sosnowski, Esquire; and David Johnson, Esquire. filed by s/ John W Blasko, Esquire. No CC</p> <p>Certificate of Service, Defendant Gateway Area Medical Associates, Inc.'s No Judge Request for Production (Set One), the 25th of April, 2005 to: Shanin Spector, Esquire; Michael Sosnowski, Esquire; and David Johnson, Esquire. filed by s/ John W Blasko, Esquire. No CC</p>
04/29/2005	<p>Filing: Reinstate Complaint Paid by: Specter, Shanin (attorney for Shaffer-Doan, Ayden) Receipt number: 1900277 Dated: 04/29/2005 Amount: \$7.00 (Check).</p> <p>2CC & 1 Reinstated Complaint to Atty.</p>
05/06/2005	<p>Order, AND NOW this 5th day of May, 2005, it is hereby ORDERED, ADJUGED and DECREED that oral argument on def. DuBois Regional Medical Center's preliminary objections to Plaintiffs' complaint, scheduled for the 8th day of June, 2005, at 1:30PM. By the Court, Fredric J. Ammerman, CC Atty Korinski</p>
05/10/2005	<p>Plaintiff's Response to Preliminary Objectionsd of Defendant, DuBois Regional Medical Center, filed by Atty. Specter 2 cert. to Atty.</p> <p>Amended Certificate of Merit as to DuBois Regional Mendical Center, filed by Atty. Casey 2 Cert. to Atty.</p> <p>Certificate of Merit as to Other Licensed Professional, Residents, Nurses, Nurse Practitioners and Other Employees Who Cared for Minor-Plaintiff, filed by Atty. Casey 2 Cert. to Atty.</p> <p>Plaintiffs' Response to New Matter of Defendant, Gateway Area Medical Associates, Inc., filed by Atty. Specter 2 Cert. to Atty.</p>

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

VELMA FRANCISKO,
Plaintiff

vs.

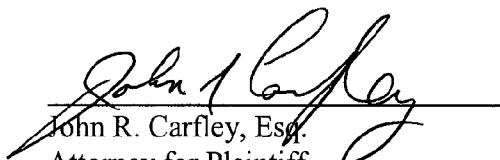
EDWARD ANDRASKO,
Defendant

No.: 2006- 143-CD

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

PLEASE issue writ of summons against Defendant, Edward Andrasko. Edward Andrasko's current address is 662 Powell Street, Hawk Run, PA 16840.


John R. Carfley, Esq.
Attorney for Plaintiff
P. O. Box 249
Philipsburg, Pa., 16866
(814) 342-5581

Dated: January 27th, 2006

FILED
1/10/06
JAN 27 2006
Atty pd. 85.00
William A. Shaw
Prothonotary/Clerk of Courts
200 Writs to Atty Carfley

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

 COPY

SUMMONS

Velma Francisko

Vs.

NO.: 2006-00143-CD

Edward Andrasko

TO: **EDWARD ANDRASKO**

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: 01/27/2006

William A. Shaw
Prothonotary

Issuing Attorney:

John R. Carfley
Post Office Box 249
Philipsburg, PA 16866
(814) 342-5581

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

VELMA FRANCISKO

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

*

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* No. 06 - 143 - CD

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*

* Type of Pleading:

*

* **PRAECIPE FOR ENTRY
OF APPEARANCE**

*

* Filed on behalf of:

* Plaintiff

*

*

* Counsel of Record for
this party:

*

*

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

*

FILED (cc Atty Naddeo)

03/38 cm
FEB 13 2006
WS

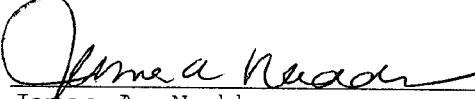
William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, *
Plaintiff,
*
v. *
*
EDWARD ANDRASKO, * No. 06-143-CD
Defendant. *

PRAECIPE FOR ENTRY OF APPEARANCE

Please enter my appearance on behalf of the Plaintiff,
Velma Francisko, in the above-captioned case.



James A. Naddeo
Attorney for Plaintiff

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

VELMA FRANCISKO

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

*

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*

* No. 06 - 143 - CD

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*

* Type of Pleading:

*

CERTIFICATE OF SERVICE

*

*

* Filed on behalf of:

* Plaintiff

*

*

* Counsel of Record for
* this party:

*

*

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

*

FILED *rec*
01/31/01 *AMN*
FEB 22 2006 *LM*

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,
Plaintiff,

vs.

EDWARD ANDRASKO,
Defendant

*

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* No. 06 - 143 - CD

*

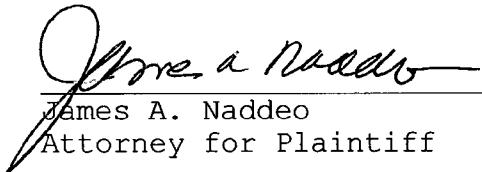
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CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Interrogatories Addresses to Defendant was served on the following and in the following manner on the 22nd day of February, 2006:

First-Class Mail, Postage Prepaid

Mr. Edward Andrasko
662 Powell Street
Hawk Run, PA 16840


James A. Naddeo
Attorney for Plaintiff

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
: Type of Pleading:
: **Praecipe for Entry of Appearance**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED

MAR 15 2006

2/1/06

William A. Shaw

Prothonotary/Clerk of Courts

no C/C

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: March 14, 2006

By: 

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

Attorneys for Defendant

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

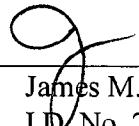
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Praeclipe for Entry of Appearance on behalf of Defendant in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 14th day of March, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:

Praecipe for Rule to File Complaint

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

FILED

MAR 15 2006

11:35 AM

William A. Shaw

Prothonotary/Clerk of Courts

No. 4/C

ISSUED PURSUANT TO DEA.

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

PRAECIPE FOR RULE TO FILE COMPLAINT

TO THE PROTHONOTARY:

Please issue a Rule on Plaintiff to file her Complaint within twenty (20) days from service thereof or suffer a judgment of non pros against her.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: March 14, 2006

By: 

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

Attorneys for Defendant

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

RULE

To: Velma Francisko
% James A. Naddeo, Esquire

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 Shaw, Prothonotary
[SEAL]

Dated: _____

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

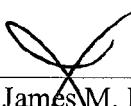
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Praeclipe for Rule to File Complaint on behalf of Defendant in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 14 day of March, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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

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

VELMA FRANCISKO,

Plaintiff,

v.

No. 2006-00143-CD

EDWARD ANDRASKO,

Defendant.

RULE

To: Velma Francisko
% James A. Naddeo, Esquire

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 Shaw, Prothonotary
[SEAL]

Dated: MARCH 15, 2006

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
:
: Type of Pleading:
: **Certificate of Service**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED NO CC
M 12 21 2006
MAR 17 2006 (60)

William A. Shaw
Prothonotary/Clerk of Courts

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

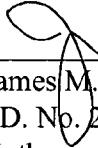
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Court-issued Rule to File Complaint in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 16th day of March, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
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

VELMA FRANCISKO, : No. 2006-00143-CD
Plaintiff :
vs. : JURY TRIAL DEMANDED
EDWARD ANDRASKO, : Type of Pleading: Complaint
Defendant : Type of Case: Civil
: Filed on behalf: Plaintiff
: Counsel of Record for This Party:
: John R. Carfley, Esq.
: I.D. No. 17621
: P. O. Box 249
: Philipsburg, PA 16866
: 814.342.5581
: James A. Naddeo, Esq.
: I.D. No.
: P. O. Box 552
: Clearfield, PA 16830
: 814.765.1601

FILED 3cc
01/29/2006 MAR 30 2006
Atty Carfley
5
William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO
Plaintiff,

v.

EDWARD ANDRASKO,
Defendant.

*
*
*
* No. 06 - 143 - CD
*
* JURY TRIAL DEMANDED
*

COMPLAINT

NOW COMES the Plaintiff, Velma Francisko, who by and through her attorney, John R. Carfley, Esquire, sets forth a claim against the Defendant, the following of which is a statement:

1. The Plaintiff is Velma Francisko, an adult individual presently residing at 479 Eagle Street, Morrisdale, Clearfield County, Pennsylvania 16858.
2. The Defendant is Edward Andrasko, an adult individual presently residing at 662 Powell Street, Hawk Run, Clearfield County, Pennsylvania 16840.
3. At the dates and times relevant hereto, Plaintiff and Defendant were friends and companions who, on occasion, visited at each other's residences for social engagements.
4. On one such visit on or about August 19, 2005, the Plaintiff, with the knowledge and acquiescence of the Defendant, visited the residence of Mr. Andrasko and waited in the garage area while the Defendant utilized his car to engage in some shopping. During this period of time, the Plaintiff remained at the Defendant's home and awaited his return, utilizing a chair in the Defendant's garage.
5. On this particular occasion, Defendant, at the completion of his trip, drove his

vehicle into the garage in order to unload the items of merchandise acquired.

6. At the date and time relevant hereto, the Defendant drove his vehicle into the garage where the Defendant stopped the vehicle momentarily by applying the brakes within the confinement of the structure. After coming to a momentary stop, Defendant, for reasons known only to the Defendant, failed to continue to apply the brakes to prevent the vehicle from further accelerating within the garage, but instead applied the accelerator instead so as to cause the vehicle to accelerate across the garage, coming into contact with the Plaintiff while she was seated in the lawn chair, causing her to forcefully impact the wall of the garage, fracturing her pelvis in several places.

7. The accident was directly and proximately caused by the negligence and carelessness of Defendant, which consisted, among other things, of the following:

- a. operating his motor vehicle in a careless and negligent manner;
- b. operating his motor vehicle at a rate of speed which was inappropriate under the circumstances;
- c. operating his motor vehicle with no warning of his approach or intended direction;
- d. not having his motor vehicle under the proper control so as to stop said vehicle within the assured clear distance ahead;
- e. operated his motor vehicle without due regard to the rights, safety and position of the Plaintiff;
- f. not having his motor vehicle under the proper control so as to stop said

vehicle before coming into contact with the person of the Plaintiff, causing the injuries complained of;

g. Failing to have his motor vehicle under proper control so as to prevent this vehicle from striking the Plaintiff;

h. failing to keep a proper lookout;

i. failing to use due care under the circumstances;

j. failing to take due notice of the Plaintiff;

k. failing to take evasive action in order to avoid impacting with the Plaintiff;

l. failing to apply his brakes in sufficient time to avoid striking Plaintiff;

m. failing to provide notice to Plaintiff of his approach.

8. By reason of the accident, Plaintiff sustained injuries to her hip, legs and pelvis in the nature of several fractures, scrapes, bruises and abrasions, together with a severe shock to her nerves and nervous system by reason of which she was rendered sick, sore, lame, prostate and disordered and was made to undergo great mental anguish and physical pain from which she will suffer and will continue to suffer for an indefinite time in the future.

9. In order to effect a cure of the aforesaid injuries, Plaintiff has been compelled to expend various large sums of money for medicine and medical attention, and she will be required to expend additional sums of money for the same purpose in the future.

10. By reason of the accident, Plaintiff has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

11. As a result of the accident, Plaintiff suffered bilateral pelvic fractures which

required hospitalization and extensive rehabilitation.

12. Plaintiff's fractures will most likely cause her significant pain and suffering for an indefinite time in the future.

13. The extent of the injuries suffered by Plaintiff was fractures of both left and right inferior and superior pubic rami. She also experienced bilateral groin pain and pain in her low back in the region of the SI joints.

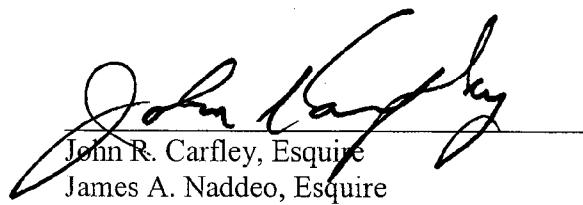
14. Plaintiff, as a result of the injuries sustained, required extensive rehabilitation which occurred at the following medical facilities:

- a. Mercy Hospital, Pittsburgh, PA.
- b. Mountain Laurel Nursing and Rehabilitation Center, Clearfield, PA.
- c. Miscellaneous other medical facilities, including affiliates of the Clearfield Hospital.

15. The Plaintiff, Velma Francisko, claims a reasonable amount for the following:

- A. Pain and suffering; depression, loss of society, inability to engage in normal activities associated with a woman her age, including gardening, walking, hiking, caring for her home and grounds; past, present and future;
- B. Privation and inconvenience: past, present and future;
- C. Future medical expenses;
- D. All other damages allowable by law.

WHEREFORE, the Plaintiff, Velma Francisko, claims damages from the Defendant, Edward Andrasko, in excess of Twenty Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.



John R. Carfley, Esquire
James A. Naddeo, Esquire

VERIFICATION

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

Velma Francisko

Velma Francisko

Dated: 3-29-04

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

VELMA FRANCISKO, : No. 2006-00143-CD
Plaintiff :
vs. : JURY TRIAL DEMANDED
EDWARD ANDRASKO, : ^{AMENDED}
Defendant : Type of Pleading: Complaint
: Type of Case: Civil
: Filed on behalf: Plaintiff
: Counsel of Record for This Party:
: John R. Carfley, Esq.
: I.D. No. 17621
: P. O. Box 249
: Philipsburg, PA 16866
: 814.342.5581
: James A. Naddeo, Esq.
: I.D. No.
: P. O. Box 552
: Clearfield, PA 16830
: 814.765.1601

FILED
01/17/08
MAR 31 2008
LM

William A. Shaw
Prothonotary/Clerk of Courts
300 County Cartfley

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

VELMA FRANCISKO
Plaintiff,

v.

EDWARD ANDRASKO,
Defendant.

*
*
*
* No. 06 - 143 - CD
*
* JURY TRIAL DEMANDED
*

NOTICE

A Complaint has been filed against you in Court. If you wish to defend against the matters set forth in the following Complaint, you must enter a written appearance personally or by attorney and file an answer in writing with the Prothonotary setting forth your defenses or objections to the matter set forth against you and serve a copy on the attorney or person filing the Complaint. You are warned that if you fail to do so, the case may proceed without you and an Order may be entered against you by the Court without further notice for the relief requested by the Petitioner. You may lose rights important to you.

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

Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641

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

VELMA FRANCISKO
Plaintiff,

v.

EDWARD ANDRASKO,
Defendant.

*
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* No. 06 - 143 - CD
*
* JURY TRIAL DEMANDED
*

AMENDED
COMPLAINT

NOW COMES the Plaintiff, Velma Francisko, who by and through her attorney, John R. Carfley, Esquire, sets forth a claim against the Defendant, the following of which is a statement:

1. The Plaintiff is Velma Francisko, an adult individual presently residing at 479 Eagle Street, Morrisdale, Clearfield County, Pennsylvania 16858.
2. The Defendant is Edward Andrasko, an adult individual presently residing at 662 Powell Street, Hawk Run, Clearfield County, Pennsylvania 16840.
3. At the dates and times relevant hereto, Plaintiff and Defendant were friends and companions who, on occasion, visited at each other's residences for social engagements.
4. On one such visit on or about August 19, 2005, the Plaintiff, with the knowledge and acquiescence of the Defendant, visited the residence of Mr. Andrasko and waited in the garage area while the Defendant utilized his car to engage in some shopping. During this period of time, the Plaintiff remained at the Defendant's home and awaited his return, utilizing a chair in the Defendant's garage.
5. On this particular occasion, Defendant, at the completion of his trip, drove his

vehicle into the garage in order to unload the items of merchandise acquired.

6. At the date and time relevant hereto, the Defendant drove his vehicle into the garage where the Defendant stopped the vehicle momentarily by applying the brakes within the confinement of the structure. After coming to a momentary stop, Defendant, for reasons known only to the Defendant, failed to continue to apply the brakes to prevent the vehicle from further accelerating within the garage, but instead applied the accelerator instead so as to cause the vehicle to accelerate across the garage, coming into contact with the Plaintiff while she was seated in the lawn chair, causing her to forcefully impact the wall of the garage, fracturing her pelvis in several places.

7. The accident was directly and proximately caused by the negligence and carelessness of Defendant, which consisted, among other things, of the following:

- a. operating his motor vehicle in a careless and negligent manner;
- b. operating his motor vehicle at a rate of speed which was inappropriate under the circumstances;
- c. operating his motor vehicle with no warning of his approach or intended direction;
- d. not having his motor vehicle under the proper control so as to stop said vehicle within the assured clear distance ahead;
- e. operated his motor vehicle without due regard to the rights, safety and position of the Plaintiff;
- f. not having his motor vehicle under the proper control so as to stop said

vehicle before coming into contact with the person of the Plaintiff, causing the injuries complained of;

- g. Failing to have his motor vehicle under proper control so as to prevent this vehicle from striking the Plaintiff;
- h. failing to keep a proper lookout;
- i. failing to use due care under the circumstances;
- j. failing to take due notice of the Plaintiff;
- k. failing to take evasive action in order to avoid impacting with the Plaintiff;
- l. failing to apply his brakes in sufficient time to avoid striking Plaintiff;
- m. failing to provide notice to Plaintiff of his approach.

8. By reason of the accident, Plaintiff sustained injuries to her hip, legs and pelvis in the nature of several fractures, scrapes, bruises and abrasions, together with a severe shock to her nerves and nervous system by reason of which she was rendered sick, sore, lame, prostate and disordered and was made to undergo great mental anguish and physical pain from which she will suffer and will continue to suffer for an indefinite time in the future.

9. In order to effect a cure of the aforesaid injuries, Plaintiff has been compelled to expend various large sums of money for medicine and medical attention, and she will be required to expend additional sums of money for the same purpose in the future.

10. By reason of the accident, Plaintiff has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

11. As a result of the accident, Plaintiff suffered bilateral pelvic fractures which

required hospitalization and extensive rehabilitation.

12. Plaintiff's fractures will most likely cause her significant pain and suffering for an indefinite time in the future.

13. The extent of the injuries suffered by Plaintiff was fractures of both left and right inferior and superior pubic rami. She also experienced bilateral groin pain and pain in her low back in the region of the SI joints.

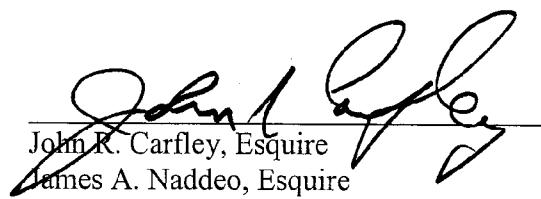
14. Plaintiff, as a result of the injuries sustained, required extensive rehabilitation which occurred at the following medical facilities:

- a. Mercy Hospital, Pittsburgh, PA.
- b. Mountain Laurel Nursing and Rehabilitation Center, Clearfield, PA.
- c. Miscellaneous other medical facilities, including affiliates of the Clearfield Hospital.

15. The Plaintiff, Velma Francisko, claims a reasonable amount for the following:

- A. Pain and suffering; depression, loss of society, inability to engage in normal activities associated with a woman her age, including gardening, walking, hiking, caring for her home and grounds; past, present and future;
- B. Privation and inconvenience: past, present and future;
- C. Future medical expenses;
- D. All other damages allowable by law.

WHEREFORE, the Plaintiff, Velma Francisko, claims damages from the Defendant, Edward Andrasko, in excess of Twenty Five Thousand (\$25,000.00) Dollars. Jury Trial Demanded.



John R. Carfley, Esquire
James A. Naddeo, Esquire

VERIFICATION

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

Velma Francisko
Velma Francisko

Dated: 3-29-04

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

VELMA FRANCISKO

Plaintiff,

*

*

*

v.

* No. 06 - 143 - CD

*

* JURY TRIAL DEMANDED

*

EDWARD ANDRASKO,

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that I forwarded a copy of the Complaint in the above captioned matter by regular mail, postage prepaid to the following attorney of record for Defendant this 31st day of March, 2006.

James M. Horne, Esq.
McQUAIDE BLASKO
811 University Drive
State College, PA 16801



John R. Carfley, Esq.
P. O. Box 249
Philipsburg, PA 16866
Attorney for Plaintiff

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:
Certificate of Service

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:
James M. Horne, Esquire
I.D. No. 26908
Katherine V. Oliver, Esquire
I.D. No. 77069
McQuaide, Blasko,
Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801
Phone: (814) 238-4926
Fax: (814) 238-9624

FILED NO
APR 03 2006
2006-00143-CD

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Answers/Objections to Plaintiff's Interrogatories in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 31st day of March, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: Chena L. Glenn-Hart
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926
Attorneys for Defendant

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
:
: Type of Pleading:
: **Certificate of Service**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED NO
M 11:41 AM
APR 06 2006
2006
WM

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Interrogatories (Set 1), Request for Production of Documents (Set 1), and Request For Production of Documents and Tangible Things (Set 2) directed to Plaintiff in the above-referenced matter was served via U.S. First Class Mail, postage paid, this 5th day of April, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
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 CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
: Type of Pleading:
: **Certificate of Service**
: Type of Case: **Civil**
: Filed on behalf of: **Defendant**
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED
m/b:08 cm No CC.
APR - 6 2006

William A. Shaw
Prothonotary

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

VELMA FRANCISKO, :
Plaintiff : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's 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 5th day of April, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
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 # 101258
NO: 06-143-CD
SERVICE # 1 OF 1
SUMMONS

PLAINTIFF: VELMA FRANCISKO
vs.
DEFENDANT: EDWARD ANDRASKO

SHERIFF RETURN

NOW, February 16, 2006 AT 8:41 AM SERVED THE WITHIN SUMMONS ON EDWARD ANDRASKO DEFENDANT AT 662 POWELL ST., HAWK RUN, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO EDWARD ANDRASKO, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

FILED
019-09-2011
APR 10 2006
WM
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	CARFLEY	16200	10.00
SHERIFF HAWKINS	CARFLEY	16200	34.41

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

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

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

:

: Type of Pleading:

: **Answer with New Matter**

:

: Type of Case: **Civil**

:

: Filed on behalf of: **Defendant**

:

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

FILED ^{NO} cc
APR 13 2006

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

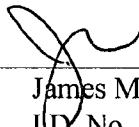
NOTICE TO PLEAD

TO: Velma Francisko
% John R. Carfley, Esquire

YOU ARE HEREBY notified to plead to the within New Matter within twenty (20) days
from the date of service hereof or a default judgment may be entered against you.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: April 11, 2006

By: 

James M. Horne, Esquire
ID. No. 26908
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

VELMA FRANCISKO, :
: No. 2006-00143-CD
Plaintiff, :
v. :
EDWARD ANDRASKO, :
: Defendant.

DEFENDANT'S ANSWER WITH NEW MATTER TO PLAINTIFF'S COMPLAINT

AND NOW, comes Defendant, Edward Andrasko, by and through his undersigned counsel, McQuaide, Blasko, Fleming & Faulkner, Inc., to file the instant Answer with New Matter to Plaintiff's Complaint, and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the allegations of paragraph 4 are admitted.
5. Admitted.
6. Denied as stated. To the contrary, at the date and time in question, Defendant brought his vehicle into the garage whereupon Defendant safely and properly brought the vehicle to a full and complete stop. Defendant turned off the ignition to the vehicle and applied the emergency brake. At or about that time, the Plaintiff informed the Defendant that he should move his vehicle in order for the Defendant's passenger to be able to exit the vehicle. At that time, the Defendant restarted his vehicle, with his foot on the brake pedal. As Defendant

released the emergency brake, the vehicle moved forward, at which time it came into contact with the Plaintiff who was seated in a folding chair directly in front of the Defendant's vehicle.

7. a. – m. The allegations of paragraphs 7 a through m inclusive are denied pursuant to Pa. Rule of Civil Procedure 1029(e).

8. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8. The same are therefore denied and strict proof thereof demanded.

9. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9. The same are therefore denied and strict proof thereof demanded.

10. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 10. The same are therefore denied and strict proof thereof demanded.

11. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 11. The same are therefore denied and strict proof thereof demanded.

12. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 12. The same are therefore denied and strict proof thereof demanded.

13. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 13. The same are therefore denied and strict proof thereof demanded.

14. a – c. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 14 a through c. The same are therefore denied and strict proof thereof demanded.

15 a. – d. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 15 a through d. The same are therefore denied and strict proof thereof demanded.

WHEREFORE, Defendant Edward Andrasko requests that the Complaint brought against him by Plaintiff Velma Francisko be dismissed, with prejudice and costs of suit.

NEW MATTER

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

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

18. To the extent Plaintiff's wage loss, if any, was paid or is payable under a policy of insurance, the same may not be pled, proven or recovered in the instant action.

19. Plaintiff's claims may be barred or reduced accordingly to the extent she was insured under a policy of insurance bearing the limiting tort option.

WHEREFORE, Defendant Edward Andrasko requests that the Complaint brought against him by Plaintiff Velma Francisko be dismissed, with prejudice and costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: April 11, 2006

By: 

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

Edward A. Andrasko
EDWARD A. ANDRASKO, SR.

Dated: 04-11-06, 2006

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

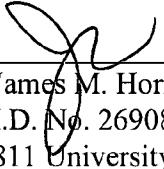
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Answer with New Matter of Defendant in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 12th day of April, 2006, to the attorney of record:

John R. Carfley, Esquire
P.O. Box 249
Philipsburg, PA 16866
(814) 342-5581

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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 CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:

: **Certificate Prerequisite to Service of
Subpoenas**

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

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William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

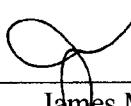
CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

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 the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each 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, is attached to this certificate,
- 3) no objection to the subpoena has been received,
- 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.

Date: April 26, 2006

By: 

James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801-6699
(814) 238-4926
Attorney for Defendant

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

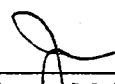
VELMA FRANCISKO, :
: No. 2006-00143-CD
Plaintiff, :
v. :
EDWARD ANDRASKO, :
: Defendant. :
:

**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. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Date: April 5, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801-6699
(814) 238-4926

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :
:

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

TO: Mercy Hospital

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO,

Plaintiff,

No. 2006-00143-CD

v.

EDWARD ANDRASKO,

Defendant.

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

TO: Mountain Laurel Nursing & Rehab.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

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

TO: Clearfield Hospital

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :
:

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

TO: Specialty Surgeons of Pittsburgh

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO,

Plaintiff,

No. 2006-00143-CD

v.

EDWARD ANDRASKO,

Defendant.

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

TO: Dick's Homecare, Inc.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :
:

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

TO: Clearfield Hospital Home Health Services

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :
:

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

TO: Mercy Orthopedic Associates

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :

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

TO: Baltazar L. Corino, M.D.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, Plaintiff, No. 2006-00143-CD
v.
EDWARD ANDRASKO, Defendant.

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

TO: Lawrence D. Bell, M.D.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, Defendant. :
:

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

TO: Joseph A. Vetrano, M.D.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

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

TO: *G. Richard Zimmerman, M.D.*

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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.

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

NAME: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

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

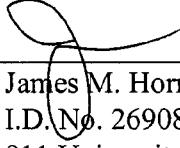
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoenas Pursuant to Rule 4009.22 in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 26th day of April, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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

VELMA FRANCISKO, :
Plaintiff : No. 2006-00143-CD
:
vs. : JURY TRIAL DEMANDED
:
EDWARD ANDRASKO, :
Defendant : Type of Pleading: Answer to
:
New Matter :
:
: Type of Case: Civil
:
: Filed on behalf: Plaintiff
:
: Counsel of Record for This Party:
:
: John R. Carfley, Esq.
: I.D. No. 17621
: P. O. Box 249
: Philipsburg, PA 16866
: 814.342.5581
:
: James A. Naddeo, Esq.
: I.D. No.
: P. O. Box 552
: Clearfield, PA 16830
: 814.765.1601

FILED

MAY 04 2006
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William A. Shaw
Prothonotary/Clerk of Courts

4 cent to Am

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

VELMA FRANCISKO :
Plaintiff, :
: :
v. : No. 06-143-CD :
: :
EDWARD ANDRASKO, : JURY TRIAL DEMANDED :
Defendant. :
:

ANSWER TO NEW MATTER

AND NOW comes the Plaintiff, who by and through her attorneys, John R. Carfley, Esq. and James A. Nadeo, Esq., responds to Defendant's Answer and New Matter in the following manner:

16. Denied. On the contrary, it is averred that paragraph 16 of Defendant's Answer and New Matter states a conclusion of law and/or asserts conclusions of law as to which no further response is required. Insofar as a response is necessary, Plaintiff asserts that there are no provisions applicable under the terms and provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law which would be appropriate and/or would apply to the factual situation at bar.

17. Denied. On the contrary, it is averred that paragraph 17 of Defendant's New Matter states a conclusion of law which does not require a further response at this time.

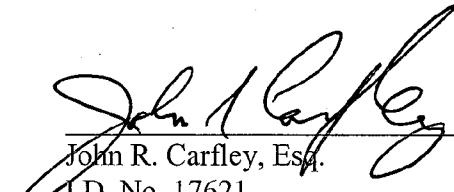
18. Denied. On the contrary, it is averred that Plaintiff has not asserted a wage loss claim applicable to the case at bar and therefore no further response is required to this answer.

19. Denied. On the contrary, it is averred that Plaintiff's claims have no limitations or any bar to recovery based upon any limited tort assertable under the terms of her own policy and

insofar as relevant, proof thereof is demanded at time of trial. By way of further answer, it is averred that Plaintiff asserts that at all times relevant hereto, she carried full tort liability under the terms of her automobile liability policy. Plaintiff further avers that even if limited tort were applicable, she would fall within the appropriate exceptions to permit her to make a full claim for recovery under the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Act.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the Plaintiff and against the Defendant consistent with the prayer and pleadings set forth in Plaintiff's Complaint, together with interest thereof and costs of this proceeding.

Respectfully submitted,



John R. Carfley, Esq.
I.D. No. 17621
P. O. Box 249
Philipsburg, PA 16866
814.342.5581

James A. Naddeo, Esq.
I.D. No.
P. O. Box 552
Clearfield, PA 16830
814.765.1601

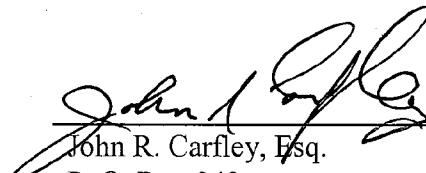
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

VELMA FRANCISKO :
Plaintiff, :
: :
v. : No. 06 - 143 - CD
: :
EDWARD ANDRASKO, : JURY TRIAL DEMANDED
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that I forwarded a copy of the Answer to New Matter in the above captioned matter by regular mail, postage prepaid to the following attorney of record for Defendant this 4th day of May, 2006.

James M. Horne, Esq.
McQUAIDE BLASKO
811 University Drive
State College, PA 16801


John R. Carfley, Esq.
P. O. Box 249
Philipsburg, PA 16866
Attorney for Plaintiff

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, : Type of Pleading:
Defendant. : **Certificate of Service**
: Type of Case: **Civil**
: Filed on behalf of: **Defendant**
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED NO
3/11/49/30
MAY 11 2006
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William A. Shaw
Prothonotary/Clerk of Courts

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

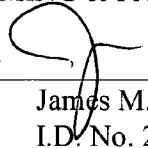
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 10th day of May, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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 CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:

: **Certificate Prerequisite to Service of
Subpoena**

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

FILED *No cc*
M/JL: 25/01
JUN 01 2006 *LS*

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

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 the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each 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, is attached to this certificate,
- 3) no objection to the subpoena has been received,
- 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.

Date: May 31, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801-6699
(814) 238-4926
Attorney for Defendant

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

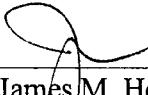
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

**NOTICE OF INTENT TO SERVE 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. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Date: May 10, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801-6699
(814) 238-4926

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO,

Plaintiff,

v.

No. 2006-00143-CD

EDWARD ANDRASKO,

Defendant.

COPY

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

TO: Clearfield Professional Group

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *26908*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

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

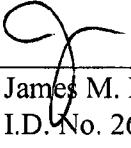
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoena in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 31st day of May, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 

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 CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
:
: Type of Pleading:
: **Certificate of Service**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED

AUG 04 2006 CR

8/12/06
William A. Shaw
Prothonotary/Clerk of Courts

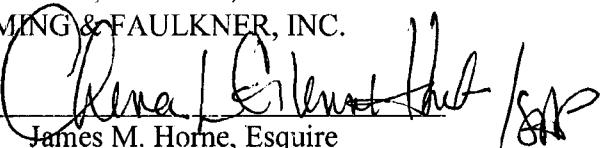
IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Deposition of Plaintiff Velma Francisko in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 2nd day of August, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.
By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926
Attorneys for Defendant

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
:
: Type of Pleading:
: **Notice of Death**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED NO cc
M 11:28:01
SEP 18 2006
S

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

NOTICE OF DEATH

The death of Edward Andrasko, a party to the above action, during the pendency of this action is noted upon the record.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: September 15, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant/Deceased Party

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Death in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 15th day of September, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: Chena L. Glenn-Hart
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant/Deceased Party

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:
Certificate of Service

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

FILED

SEP 19 2006

W/11:50/

William A. Shaw
Prothonotary/Clerk of Court

no 9C

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

VELMA FRANCISKO, : No. 2006-00143-CD
Plaintiff, :
v. :
EDWARD ANDRASKO, :
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 18th day of September, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: Chena L. Glenn-Hart

James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD

: Type of Pleading:

: **Certificate Prerequisite to Service of
Subpoena**

: Type of Case: **Civil**

: Filed on behalf of: **Defendant**

: Counsel of Record for this Party:

: James M. Horne, Esquire

: I.D. No. 26908

: Katherine V. Oliver, Esquire

: I.D. No. 77069

: McQuaide, Blasko,

: Fleming & Faulkner, Inc.

: 811 University Drive

: State College, PA 16801

: Phone: (814) 238-4926

: Fax: (814) 238-9624

FILED

OCT 11 2006

M/11/06

William A. Shaw
Prothonotary/Clerk of Courts

6K
No 4C

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

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 the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each 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, is attached to this certificate,
- 3) no objection to the subpoena has been received,
- 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.

Date: October 9, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
811 University Drive
State College, PA 16801-6699
(814) 238-4926
Attorneys for Defendant

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

VELMA FRANCISKO,

: No. 2006-00143-CD

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

**NOTICE OF INTENT TO SERVE 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. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Date: September 18, 2006

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801-6699
(814) 238-4926

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

COPY

VELMA FRANCISKO, Plaintiff : No. 2006-00143-CD
v.

EDWARD ANDRASKO, Defendant.

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

TO: *Mark B. Casteel, D.C.*

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 chiropractic and/or medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *Chena L. Glenn-Hart, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Certificate Prerequisite to Service of Subpoena in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 9th day of October, 2006, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: Chena L. Glenn-Hart
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
: Type of Pleading:
: **Notice of Substitution of Successor**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED *no cc*
OCT 27 2006
William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

NOTICE OF SUBSTITUTION OF SUCCESSOR

AND NOW, comes Edward Andrasko, Jr., Executor of the Estate of Edward Andrasko, Sr., by and through his attorneys, McQuaide, Blasko, Fleming & Faulkner, Inc., to file the instant Notice of Substitution of Successor pursuant to Pennsylvania Rule of Civil Procedure 2352, and in support thereof avers as follows:

1. Edward Andrasko, Sr., Defendant in the above-referenced matter, passed away on August 10, 2006, during the pendency of this action.
2. At the time of his death, Defendant Edward Andrasko, Sr., was represented by the undersigned counsel in this action.
3. The Last and Will and Testament of Edward Andrasko, Sr. designated Edward Andrasko, Jr. as Executor of the Estate of Edwards Andrasko, Sr.
4. On August 16, 2006, Letters Testamentary were granted to Edward Andrasko, Jr.
5. A Short Certificate reflecting information contained herein is attached hereto as Exhibit "A."
6. As Executor of the Estate of Edward Andrasko, Sr., Edward Andrasko, Jr. is responsible for handling the instant matter on behalf of the deceased Defendant.

7. Pursuant to Pennsylvania Rule of Civil Procedure 2352, Edward Andrasko, Jr. hereby gives notice of his substitution as successor for Defendant Edward Andrasko, Sr. in the above-referenced matter.

Respectfully submitted,

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Dated: October 26, 2006

By: _____



James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

EXHIBIT A

SHORT CERTIFICATE – LETTERS TESTAMENTARY

Certificate of Appointment of Executor

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

} ss:

The undersigned, Register for the Probate of Wills and granting Letters of Administration in and for the County of Clearfield, in the Commonwealth of Pennsylvania.

DO HEREBY CERTIFY and made known, that on the 16th day of August, in the year of our Lord, 2006, LETTERS TESTAMENTARY on the estate of EDWARD A. ANDRASKO, SR, deceased, were granted to EDWARD A. ANDRASKO, JR, Executor, named in the will, he having first been qualified well and truly to administer the same. I further certify that said letters are in full force and effect at the present time, and entitled to full faith and credit.

Date of Death: August 10, 2006
File #: 1706-0454
Social Security No.: 195-24-5953

Given under my hand and seal of office this 20th
day of October in the year of our Lord, 2006



Register of Wills

MY COMMISSION EXPIRES
FIRST MONDAY IN JANUARY 2008

VERIFICATION

The undersigned verifies that he is authorized to make this Verification on his own behalf and that the statements made in the foregoing Notice of Substitution of Successor are true and correct to the best of his knowledge, information and belief. The undersigned understands that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.


EDWARD A. ANDRASKO, JR.

Dated: 10/20, 2006

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Substitution of Successor in the above-captioned matter was mailed by U.S. 1st Class Mail, postage prepaid, on this 26 day of October, 2006, to the attorney of record:

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

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
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

VELMA FRANCISKO,
Plaintiff

vs. : No.: 2006-00143-CD

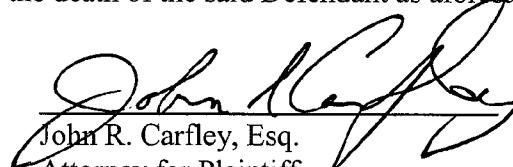
EDWARD ANDRASKO,
Defendant

PRAECLYPE TO AMEND CAPTION

AND NOW comes, John R. Carfley, Esq., Attorney for Plaintiff in the above captioned matter and respectfully requests that the above caption be amended in the following manner and for the following reasons:

1. The Defendant in the above matter passed away on August 6, 2006. An estate was opened in the Office of the Clearfield County Register of Wills' to No. 17-06-0454.
2. Attorney David Ammerman, Esq., is the attorney of record for the Estate of Edward Andrasko. The Executor of the Estate is the decedent's son, Edward Andrasko, Jr.
2. The caption in this proceeding should, as a result of the death of Edward Andrasko, now be amended to read "Velma Francisko, Plaintiff vs. Estate of Edward Andrasko, late of Hawk Run, Clearfield County, PA, c/o Edward Andrasko, Jr., Executor, Defendant".

WHEREFORE, your Petitioner respectfully requests that the caption in the above matter be amended as stated herein due to the death of the said Defendant as aforesaid.


John R. Carfley, Esq.
Attorney for Plaintiff
P. O. Box 249
Philipsburg, PA 16866
(814) 342-5581

FILED

NOV 01 2006

011-401-6
William A. Shaw
Prothonotary/Clerk of Courts
2 Cents to APN

Dated:

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

VELMA FRANCISKO,
Plaintiff

vs.

EDWARD ANDRASKO,
Defendant

: No.: 2006-00143-CD

ORDER

AND NOW, this 6th day of November, 2006, it is hereby Ordered and Decreed that the caption in the above matter shall be amended to read as follows for all pleadings which may be subsequently filed in the above matter:

Velma Francisko,
Plaintiff

vs.

Estate of Edward Andrasko, decedent, c/o
Edward Andrasko, Jr., Executor
Defendant

: No. 2006-00143-CD

BY THE COURT,

Paul E. Cheung
J.

FILED
01/33/07 2CC
NOV 07 2006 Atty Cartsley
William A. Shaw
Prothonotary/Clerk of Courts
GR

DATE: 11/7/06

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:

FILED

NOV 07 2006

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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* No. 06 - 143 - CD

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*

*

* Type of Pleading:

* **PRAECIPE**

*

*

*

* Filed on behalf of:
* Plaintiff

*

*

*

* Counsel of Record for
* this party:

*

*

*

*

*

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

FILED ^{ICC}
01/18/07 *Any Naddeo*
MAR 07 2007
GW

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

*

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*

*

*

*

*

No. 06 - 143 - CD

PRAECIPE

Please schedule a status conference in the above-captioned case.

NADDEO & LEWIS, LLC

By James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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* No. 06 - 143 - CD

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* Type of Pleading:

*

* **CERTIFICATE OF SERVICE**

*

* Filed on behalf of:

* Plaintiff

*

*

* Counsel of Record for
* this party:

*

*

* James A. Naddeo, Esquire

*

* NADDEO & LEWIS, LLC
* 207 East Market Street
* PO Box 552
* Clearfield, PA 16830
* (814) 765-1601

*

FILED *sec*
03:31 PM MAR 09 2007 *Atty Naddeo*
S
William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,

Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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No. 06 - 143 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Praecipe and Scheduling Order were served on the following and in the following manner on the 9th day of March, 2007:

First-Class Mail, Postage Prepaid

James M. Horne, Esquire
McQuaide Blasko Law Offices
811 University Drive
State College, PA 16801

NADDEO & LEWIS, LLC

James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

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

VELMA FRANCISKO,
Plaintiff,

V.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

* No. 06 - 143 - CD

* Type of Pleading:

* SCHEDULING ORDER

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

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

FILED 200
01/04/07 Atty
MAR 09 2007 Nadeo

William A. Shaw
Prothonotary/Clerk of Courts (GK)

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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No. 06 - 143 - CD

ORDER

AND NOW, this 8th day of March, 2007, upon
consideration of the Praecipe for Status Conference filed by James
A. Naddeo, Esquire, Attorney for Plaintiff in the above-captioned
case, it is hereby ORDERED and DIRECTED that a status conference
be held on the 30th day of March, 2007 at 10:15 A.m.

BY THE COURT

Paul E Cherry

FILED

MAR 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 3/9/07

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

VELMA FRANCISKO

:

VS.

: NO. 06-143-CD

ESTATE OF EDWARD ANDRASKO,

:

DECEDENT, c/o EDWARD

:

ANDRASKO, JR., Executor

:

O R D E R

AND NOW, this 30th day of March, 2007, following status conference, it is the ORDER of this Court that all discovery shall be completed by no later than June 30, 2007, with the matter being listed on the Civil Trial List by no later than July 6, 2007.

BY THE COURT,


Judge

FILED

01/21/3501
MAR 30 2007

William A. Shaw
Prothonotary/Clerk of Courts

CC Attns:
Haddoo
Carfley
Horne
Oliver



FILED

MAR 30 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 3/30/07

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

* No. 06 - 143 - CD

* Type of Pleading:

* **PRAECIPE TO LIST FOR
TRIAL**

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

* James A. Naddeo, Esquire

* NADDEO & LEWIS, LLC
* 207 East Market Street
* PO Box 552
* Clearfield, PA 16830
* (814) 765-1601

Dated: June 4, 2007

FILED *1cc*
06/04/2007 *W.A. Naddeo*
JUN 04 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,
Plaintiff,

V.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

No. 06 - 143 - CD

PRAECIPE TO LIST FOR TRIAL

TO THE PROTHONOTARY:

Please place the above-captioned matter on the next list for trial. In support thereof I certify the following:

1. There are no Motions outstanding.
2. Discovery has been completed and the case is ready for trial.
3. The case is to be heard by jury.
4. Notice of the Praecept has been given to opposing counsel.
5. The time for trial is estimated at two-three (2-3) days.

NADDEC & LEWIS, LLC

BY James A. Naddeco
James A. Naddeco
Attorney for Plaintiff

Date: June 4, 2007

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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No. 06 - 143 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Praeclipe to List for Trial was served on the following and in the following manner on the 4th day of June, 2007:

First-Class Mail, Postage Prepaid

James M. Horne, Esquire
McQuaide Blasko Law Offices
811 University Drive
State College, PA 16801

NADDEO & LEWIS, LLC

James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

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

VELMA FRANCISKO,

Plaintiff,

v.

EDWARD ANDRASKO,

Defendant.

: No. 2006-00143-CD
:
: Type of Pleading:
: **Certificate of Service**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED No CC.
M/10:55 AM
JUN 21 2007
WZ

William A. Shaw
Prothonotary/Clerk of Courts

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

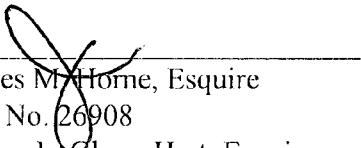
VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Notice of Intent to Serve Subpoena for Production of Documents and Things in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 20th day of June, 2007, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801
(814) 238-4926

Attorneys for Defendant

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

VELMA FRANCISKO,

Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
Decedent, % EDWARD ANDRASKO, JR.,
Executor,

Defendant.

: No. 2006-00143-CD
:
:
: Type of Pleading:
: **Certificate Prerequisite to Service of
Subpoenas Pursuant to Rule 4009.22**
:
: Type of Case: **Civil**
:
: Filed on behalf of: **Defendant**
:
: Counsel of Record for this Party:
: James M. Horne, Esquire
: I.D. No. 26908
: Katherine V. Oliver, Esquire
: I.D. No. 77069
: McQuaide, Blasko,
: Fleming & Faulkner, Inc.
: 811 University Drive
: State College, PA 16801
: Phone: (814) 238-4926
: Fax: (814) 238-9624

FILED
M 7/03/07
JUL 02 2007
no cc

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

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

VELMA FRANCISKO, :
Plaintiff : No. 2006-00143-CD
v. :
: :
ESTATE OF EDWARD ANDRASKO, :
Decedent, % EDWARD ANDRASKO, JR., :
Executor, :
Defendant. :
:

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 the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each 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, is attached to this certificate,
- 3) Plaintiff's counsel has waived the 20-day objection period,
- 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.

Date: June 29, 2007

By: _____
James M. Horne, Esquire
I.D. No. 26908
811 University Drive
State College, PA 16801-6699
(814) 238-4926

Attorney for Defendant

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

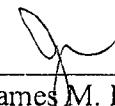
VELMA FRANCISKO, : No. 2006-00143-CD
Plaintiff, :
v. :
EDWARD ANDRASKO, :
Defendant. :

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 that attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

Date: June 20, 2007

By: 

James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
811 University Drive
State College, PA 16801-6699
(814) 238-4926

Attorneys for Defendant

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, Plaintiff, : No. 2006-00143-CD

v.

EDWARD ANDRASKO, Defendant.

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

TO: Philipsburg Hospital

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

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

TO: Moshannon Valley Pharmacy

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 pharmacy/medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

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

TO: John C. Evans, D.O.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934 for the time period June 21, 2006 to present.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISCO, :
Plaintiff, : No. 2006-00143-CD
v.

EDWARD ANDRASKO,
Defendant.

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

TO: *Clearfield Hospital*

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934 for the time period April 5, 2006 to present.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID#: *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated:

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

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

TO: *Clearfield Professional Group*

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934 for the time period May 30, 2006 to present.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

COPY

COMMONWEALTH OF PENNSYLVANIA
COUNTY of CLEARFIELD

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
EDWARD ANDRASKO, :
Defendant. :

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

TO: Lawrence D. Bell, M.D.

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 medical records and invoices in your possession pertaining to Velma L. Francisko, SS#186-28-1130, Birthdate: 7/14/1934 for the time period April 5, 2006 to present.*

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: *James M. Horne, Esquire*
ADDRESS: *811 University Drive, State College, PA 16801*
TELEPHONE: *(814) 238-4926*
SUPREME CT ID# *82750*
ATTORNEY FOR: *Defendant*

BY THE COURT:

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

Dated: _____

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

VELMA FRANCISKO, :
Plaintiff, : No. 2006-00143-CD
v. :
ESTATE OF EDWARD ANDRASKO, :
Decedent, % EDWARD ANDRASKO, JR., :
Executor, :
Defendant. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Certificate Prerequisite to Service of Subpoenas Pursuant to Rule 4009.22 in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 29th day of June, 2007, to the attorneys/parties of record:

James A. Naddeo, Esquire
207 East Market Street
P.O. Box 552
Clearfield, PA 16830

McQUAIDE, BLASKO,
FLEMING & FAULKNER, INC.

By: 
James M. Horne, Esquire
I.D. No. 26908
Chena L. Glenn-Hart, Esquire
I.D. No. 82750
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

VELMA FRANCISKO

-vs-

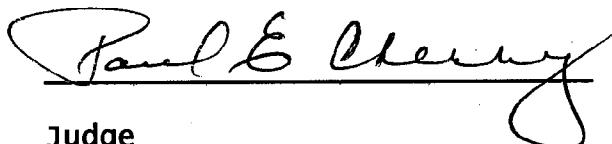
No. 06-143-CD

ESTATE OF EDWARD ANDRASKO,
DECEASED, c/o EDWARD
ANDRASKO, JR., Executor

O R D E R

AND NOW, this 26th day of July, 2007, this being
the date set for Civil call; upon the request of counsel,
it is the ORDER of this Court that the matter shall be and
is hereby continued until the Winter 2008 Term of Civil
Court.

BY THE COURT,


Judge

FILED *cc Atty:*

07/27/07
JUL 27 2007

William A. Shaw
Prothonotary/Clerk of Courts

Naddoo
J. Carley
J. Horne
K. Oliver

(6K)

FILED

JUL 27 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 7/27/07

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

VELMA FRANCISKO

vs.

No. 06-143-CD

ESTATE OF EDWARD ANDRASKO,
DECENDENT, c/o EDWARD
ANDRASKO, JR. Executor

FILED

OCT 12 2007

6/22/00/c

William A. Shaw
Prothonotary/Clerk of Courts (GK)

sent to MARY C

Nanore
L
Hannah

O R D E R

AND NOW, this 10th day of October, 2007, it is the Order of
the Court that a pre-trial conference in the above-captioned matter has been
scheduled for Thursday, November 15, 2007 at 3:00 P.M. in Judges Chambers,
Clearfield County Courthouse, Clearfield, PA. Additionally, Jury Selection in this
matter will be held on January 3, 2008.

BY THE COURT:


PAUL E. CHERRY
Judge

DATE: 10.12-07

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

FILED

OCT 12 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

* No. 06 - 143 - CD

* Type of Pleading:

* **PRAECIPE TO SETTLE
AND DISCONTINUE**

* Filed on behalf of:
* Plaintiff

* Counsel of Record for
* this party:

* James A. Naddeo, Esquire

* NADDEO & LEWIS, LLC
* 207 East Market Street
* PO Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED *acc & a/crt
01:45pm of disc issued
NOV 20 2007 to James Naddeo
copy to c/a and
William A. Shaw Judge Cherry
Prothonotary/Clerk of Courts*

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

VELMA FRANCISKO, *
Plaintiff, *
*
* v. *
* No. 06 - 143 - CD
ESTATE OF EDWARD ANDRASKO, *
DECEDENT, C/O EDWARD *
ANDRASKO, JR., EXECUTOR *
Defendant. *

PRAECIPE TO SETTLE AND DISCONTINUE

TO THE PROTHONOTARY:

Please mark the above-captioned case settled and discontinued.

Naddeo & Lewis, LLC

James A. Naddeo
James A. Naddeo, Esquire
Attorney for Plaintiff

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

VELMA FRANCISKO,
Plaintiff,

v.

ESTATE OF EDWARD ANDRASKO,
DECEDEDENT, C/O EDWARD
ANDRASKO, JR., EXECUTOR
Defendant.

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No. 06 - 143 - CD

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Praeclipe to Settle and Discontinue was served on the following and in the following manner on the 20th day of November, 2007:

First-Class Mail, Postage Prepaid

James M. Horne, Esquire
McQuaide Blasko Law Offices
811 University Drive
State College, PA 16801

NADDEO & LEWIS, LLC

James A. Naddeo
James A. Naddeo
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Velma Francisko

Vs.
Estate of Andrew Andrasko, decedent
Edward Andrasko Jr.

No. 2006-00143-CD

CERTIFICATE OF DISCONTINUATION

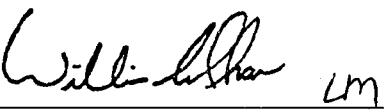
Commonwealth of PA
County of Clearfield

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 November 20, 2007, marked:

Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by John R. Carfley Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 20th day of November A.D. 2007.



William A. Shaw, Prothonotary