

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

vs.

BLY DEVELOPMENT GROUP, INC.,
Defendant

CIVIL ACTION - LAW

No. 06-338-CD
- 2006 C.D.

Type of Pleading:
**Praeipce for Issuance for
Writ of Summons**

Filed on Behalf of:
Cynthia Cava, Plaintiff

Counsel of Record for this Party:

Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
Lukehart, Lundy & Gordon
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

FILED

FEB 08 2006

William A. Shaw
Prothonotary Clerk of Courts
Pen Court ORDER

FILED Any pd 85.00
MAR 03 2006 ICC 1 writ to Shff

William A. Shaw
Prothonotary/Clerk of Courts

March 8, 2006 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

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

CYNTHIA CAVA,

Plaintiff

vs.

BLY DEVELOPMENT GROUP, INC.,
Defendant

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No.

- 2006 C.D.

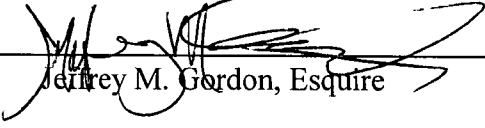
PRAECIPE FOR ISSUANCE OF WRIT OF SUMMONS

To the Prothonotary:

Kindly issue a Writ of Summons in the above-captioned action.

LUKEHART, LUNDY & GORDON

February 7, 2006

By:  Jeffrey M. Gordon, Esquire

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

CC-1

SUMMONS

Cynthia Cava

Vs.

NO.: 2006-00338-CD

Bly Development Group, Inc.

TO: BLY DEVELOPMENT GROUP, INC.

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: 03/03/2006



William A. Shaw
Prothonotary

Issuing Attorney:

Jeffrey M. Gordon
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

Y & GORDON

Law

(4774)

J. Kipp Luk

Jeffrey Lun

Jeffrey M. C

152 Jefferson Street

Brookville, PA 15825

Direct: 814-849-6800

Fax: 819-849-6363

February 7,

M: Kathy from Atty. Jeffrey
Pr
C
2 Gordon's office called -
C
I She sent a precept for issuance of
Writ of Summons - please
hold on to this until she
sends a copy with
corrections on it. 'py
I checked on 3/3/02 -
~~DATE 2/3/02~~

I thank you for any questions, please feel free to
contact me.

PROCEED ✓/
WRIT OF SUMMONS
FROM JEFF GORDON
OFFICE

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

SUMMONS

Cynthia Cava

Vs.

NO.: 2006-00338-CD

Bly Development Group, Inc.

TO: BLY DEVELOPMENT GROUP, INC.

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: 2/08/06

William A. Shaw
Prothonotary

Issuing Attorney:

Jeffrey M. Gordon
152 Jefferson Street
Brookville, PA 15825

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

CIVIL ACTION - LAW

vs.

No. 2006-00338-CD

BLY DEVELOPMENT GROUP, INC.,
Defendant

Type of Pleading:
Motion and Order

Filed on Behalf of:
Cynthia Cava, Plaintiff

Counsel of Record for this Party:

Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

FILED

MAR 08 2006

0/9:50/12

William A. Shaw
Prothonotary/Clerk of Courts

2 UPST TO ATTY

ISSUED NEW WRIT
DATED FEB 8, 2006.

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

CYNTHIA CAVA,	:	
	:	
Plaintiff	:	
	:	
vs.	:	No. 2006-00338-CD
	:	
BLY DEVELOPMENT GROUP, INC.,	:	
	:	
Defendant	:	

MOTION DIRECTING CLEARFIELD COUNTY
PROTHONOTARY TO RE-FILE ACTION

AND NOW, comes the Plaintiff, Cynthia Cava, by and through her counsel, Lukehart, Lundy & Gordon, by Jeffrey M. Gordon, Esquire, and files this Motion respectfully requesting that this Honorable Court Order the Clearfield County Prothonotary's Office to re-file the above-captioned action as of February 8, 2006, rather than as filed on March 3, 2006, and in support therefore, avers as follows:

1. On February 7, 2006, Plaintiff, through her counsel, presented to the Clearfield County Prothonotary's Office a Praecipe for Issuance for Writ of Summons in the above-referenced action. A copy evidenced by the letter sent to the Prothonotary along with the Praecipe for Issuance for Writ of Summons is attached hereto as Exhibits "A" and "B".

2. On February 8, 2006, Kathleen Sherman, paralegal for Plaintiff's counsel, contacted the Clearfield County Prothonotary's office by telephone requesting that the Praecipe for Issuance for Writ of Summons not be filed until such time as Plaintiff's counsel had an opportunity to once again speak with Plaintiff about the circumstances surrounding the incident. Please see telephone record, specifically line 29, evidencing telephone call made at 8:55 a.m. on

February 8, 2006, attached hereto as Exhibit "C."

3. After speaking with Plaintiff, counsel for Plaintiff determined that the proper party had been listed on the Praeceptum for Issuance for Writ of Summons, and the case should move forward as captioned.

4. On February 8, 2006, Kathleen Sherman, paralegal for Plaintiff's counsel, contacted the Clearfield County Prothonotary's office and spoke directly with the Prothonotary, William Shaw, and requested that Mr. Shaw file the Praeceptum for Issuance for Writ of Summons. Please see telephone record, specifically line 30, evidencing telephone call made at 1:36 p.m. on February 8, 2006, attached hereto as Exhibit "C."

5. On March 3, 2006, Plaintiff's counsel received a telephone call from the Clearfield County Prothonotary's office inquiring whether or not the Prothonotary should file the Praeceptum for Issuance for Writ of Summons, which Plaintiff's counsel thought had already been filed on February 8, 2006.

6. The Clearfield County Prothonotary's Office prepared the Writ of Summons on March 3, 2006. On that same date, Plaintiff's counsel contacted William Shaw, Prothonotary, indicating that the Writ of Summons should have been issued on February 8, 2006, and that the statute of limitations had run on February 24, 2006.

7. William Shaw, Prothonotary, acknowledges he received the telephone call from Kathleen Sherman, paralegal for Jeffrey M. Gordon, Esquire, but could not recollect the exact date of said telephone call nor the exact conversation.

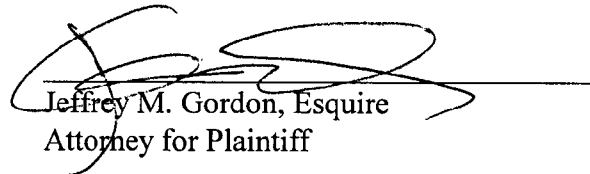
8. William Shaw, Prothonotary, did indicate to Plaintiff's counsel that if Kathleen Sherman had a clear recollection of the conversation, that he would not object to the same.

Attached hereto as Exhibit "D" is an Affidavit from Kathleen Sherman, setting forth her specific recollection of the telephone calls made to the Clearfield County Prothonotary's office.

9. Solicitor for the Clearfield County Prothonotary's Office, David S. Ammerman, has discussed this situation with both William Shaw, Prothonotary and Jeffrey M. Gordon, Esquire, and does not object for the relief sought by this Motion.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to issue an Order directing the Clearfield County Prothonotary to re-file the Praecipe for Issuance for Writ of Summons as of February 8, 2006, and remove from the docket the Praecipe filed on March 3, 2006.

Respectfully submitted,



Jeffrey M. Gordon, Esquire
Attorney for Plaintiff

LUKEHART, LUNDY & GORDON

Attorneys at Law
1-877-777-4LLG (4774)

J. Kipp Lukehart, Esquire
Jeffrey Lundy, Esquire
Jeffrey M. Gordon, Esquire

152 Jefferson Street
Brookville, PA 15825
Direct: 814-849-6800
Fax: 819-849-6363

February 7, 2006

Mr. William Shaw
Prothonotary
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830

Re: *Cynthia Cava v. Bly Development Group, Inc.*

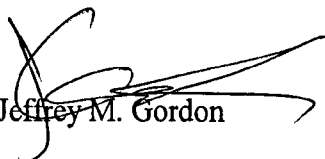
Dear Mr. Shaw:

Please accept for filing a Praecipe for Issuance for Writ of Summons regarding the above-referenced matter, along with the filing fee of \$85.00. Kindly affix your time-stamp to the enclosed copy and return the same to my office in the enclosed self-addressed, stamped envelope.

After the Writ is prepared, would you please deliver the same to the Sheriff's Office with the enclosed envelope?

I thank you for your anticipated assistance. Should you have any questions, please feel free to contact me.

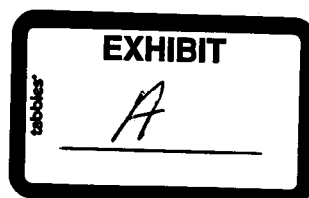
Sincerely,



Jeffrey M. Gordon

JMG/kjs

Enclosures



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

CIVIL ACTION - LAW

vs.

No. - 2006 C.D.

BLY DEVELOPMENT GROUP, INC.,
Defendant

Type of Pleading:
**Praecipe for Issuance for
Writ of Summons**

Filed on Behalf of:
Cynthia Cava, Plaintiff

Counsel of Record for this Party:

Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
Lukehart, Lundy & Gordon
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

EXHIBIT

B

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

CYNTHIA CAVA,

Plaintiff

vs.

BLY DEVELOPMENT GROUP, INC.,

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No.

- 2006 C.D.

PRAECIPE FOR ISSUANCE OF WRIT OF SUMMONS

To the Prothonotary:

Kindly issue a Writ of Summons in the above-captioned action.

LUKEHART, LUNDY & GORDON

February 7, 2006

By:


Jeffrey M. Gordon, Esquire

Page 4 of 8

Mail Date:
Billing Number:
Account Number:

MARCH 07, 2006
814-849-6800
020 781 688 888



DIRECTORY ADVERTISING SUMMARY OF CURRENT CHARGES

NON-BASIC SERVICE
DIRECTORY ADVERTISING * 83.40
TOTAL NON-BASIC SERVICE 83.40
TOTAL DIRECTORY ADVERTISING CHARGES 83.40

* Detail of Directory Advertising charges appear on the last page of this bill



ALLTEL LONG DISTANCE SUMMARY OF CURRENT CHARGES

Toll charge inquiries call 1-800-843-8214

TOLL SERVICE
LONG DISTANCE CHARGES 83.94
FEDERAL TAX 2.72
STATE TAX 5.40
STATE TAX ADJUSTMENT SURCHARGE .48 CR
UNIVERSAL SERVICE FUND CHARGE .31
STATE GROSS RECEIPTS TAX 4.20
TOTAL TOLL SERVICE 98.20
TOTAL ALLTEL LONG DISTANCE CHARGES 98.20

ALLTEL LONG DISTANCE Direct Dialed Calls FOR (814) 849-6800

LINE	DATE	TIME	CITY CALLED	AREA	NUMBER	CL	RP	MIN	AMOUNT
1	02/01	0923A	REYNOLDSVL	PA	814 653-2328	S	D	1.0	.07
2	02/01	0924A	GIBSONIA	PA	724 444-1100	S	D	1.9	.12
3	02/01	0948A	CLEARFIELD	PA	814 765-2641	S	D	0.3	.02
4	02/01	0948A	CLEARFIELD	PA	814 765-2641	S	D	1.9	.12
5	02/01	1029A	EMPORIUM	PA	814 486-9328	S	D	0.4	.03
6	02/01	1115A	NEW CASTLE	PA	724 658-2000	S	D	9.8	.64
7	02/01	0143P	BUTLER	PA	724 679-5109	S	D	0.7	.05
8	02/01	0149P	BROCKWAY	PA	814 285-2120	S	D	0.8	.05
9	02/02	1131A	BROCKWAY	PA	814 266-6984	S	D	4.1	.27
10	02/02	1135A	BROCKWAY	PA	814 285-6324	S	D	7.8	.48
11	02/03	0851A	REYNOLDSVL	PA	814 653-2037	S	D	1.5	.10
12	02/03	0944A	STHELENAIS	QC	843 838-0290	S	D	1.0	.06
13	02/03	0947A	SYKEVILLE	PA	814 884-2429	S	D	8.7	.05
14	02/03	0138P	REYNOLDSVL	PA	814 653-8165	S	D	1.7	.11
15	02/06	0834A	PUNXSUTAWY	PA	814 962-0235	S	D	0.9	.06
16	02/06	0848A	PUNXSUTAWY	PA	814 962-0235	S	D	1.0	.07
17	02/06	0146P	DUBOIS	PA	814 371-3881	S	D	1.7	.11
18	02/06	0208P	DUBOIS	PA	814 375-1167	S	D	1.3	.08
19	02/07	0854A	INDIANA	PA	724 348-4893	S	D	2.3	.14
20	02/07	1003A	REYNOLDSVL	PA	814 541-7898	S	D	0.3	.02
21	02/07	1003A	DUBOIS	PA	814 376-6036	S	D	0.7	.05
22	02/07	1008A	DUBOIS	PA	814 371-3709	S	D	2.8	.17
23	02/07	1124A	HARRISONCY	PA	724 744-2670	S	D	4.3	.29
24	02/07	1127A	BROCKWAY	PA	814 266-2120	S	D	4.7	.31
25	02/07	0134P	BROCKWAY	PA	814 265-0830	S	D	1.8	.10
26	02/07	0208P	GLENNHAW	PA	412 487-3124	S	D	0.8	.04
27	02/08	0843A	CLEARFIELD	PA	814 765-2641	S	D	0.3	.02
28	02/08	0850A	CLARION	PA	814 226-6030	S	D	0.8	.04
29	02/08	0853A	CLEARFIELD	PA	814 765-2641	S	D	1.9	.12

ALLTEL LONG DISTANCE Direct Dialed Calls FOR (814) 849-6800

LINE	DATE	TIME	CITY CALLED	AREA	NUMBER	CL	RP	MIN	AMOUNT
30	02/08	0136P	CLEARFIELD	PA	814 765-2641	S	D	1.4	.08
31	02/08	0849A	RIDGWAY	PA	814 778-4144	S	D	1.0	.07
32	02/08	0849A	WEXFORD	PA	724 835-1500	S	D	5.8	.38
33	02/09	1035A	CLARION	PA	814 226-6030	S	D	0.4	.03
34	02/09	1035A	CLARION	PA	814 226-6030	S	D	1.5	.10
35	02/08	1045A	NORTH EAST	PA	814 726-2048	S	D	0.8	.06
36	02/09	1107A	PITTSBURGH	PA	412 281-0579	S	D	2.0	.13
37	02/09	1258P	DUBOIS	PA	814 371-3881	S	D	1.4	.09
38	02/09	0125P	PITTSBURGH	PA	412 583-0858	S	D	1.3	.08
39	02/09	0142P	PITTSBURGH	PA	412 671-8122	S	D	1.5	.10
40	02/09	0144P	PITTSBURGH	PA	412 331-4242	S	D	8.4	.56
41	02/10	0829A	DUBOIS	PA	814 375-5305	S	D	0.7	.05
42	02/10	0832A	PITTSBURGH	PA	412 847-4700	S	D	0.3	.02
43	02/10	1030A	REYNOLDSVL	PA	814 653-8166	S	D	1.4	.09
44	02/10	1152A	MITTANING	PA	724 548-3251	S	D	0.8	.04
45	02/10	0251P	REYNOLDSVL	PA	814 653-8245	S	D	0.8	.06
46	02/10	0303P	GIBSONIA	PA	724 444-1100	S	D	1.1	.07
47	02/10	0448P	HARRISONCY	PA	724 744-2670	S	D	6.3	.02
48	02/10	0450P	HARRISONCY	PA	724 744-2670	S	D	1.5	.10
49	02/13	0821A	PITTSBURGH	PA	412 847-4700	S	D	0.3	.02
50	02/13	0830A	PERRYSVL	PA	412 369-9908	S	D	4.3	.28
51	02/13	0832A	HARRISONCY	PA	724 744-2670	S	D	7.4	.48
52	02/13	0940A	HARRISONCY	PA	724 744-2670	S	D	4.3	.28
53	02/13	1004A	DUBOIS	PA	814 375-6030	S	D	0.5	.03
54	02/13	1010A	DUBOIS	PA	814 371-3700	S	D	3.5	.16
55	02/13	1135A	DUBOIS	PA	814 371-3881	S	D	0.6	.03
56	02/13	0327P	PITTSBURGH	PA	412 381-4242	S	D	1.4	.08
57	02/13	0445P	HARRISONCY	PA	724 744-2670	S	D	12.3	.80
58	02/14	0808A	DUBOIS	PA	814 371-3141	S	D	4.2	.27
59	02/14	0802A	REYNOLDSVL	PA	814 653-8245	S	D	0.3	.02
60	02/14	0328P	REYNOLDSVL	PA	814 541-8044	S	D	0.8	.04
61	02/14	0331P	HARRISONCY	PA	724 744-2670	S	D	0.9	.05
62	02/14	0445P	REYNOLDSVL	PA	814 653-8166	S	D	1.5	.10
63	02/15	0910A	REYNOLDSVL	PA	814 541-8044	S	D	5.8	.38
64	02/15	1028A	PITTSBURGH	PA	412 381-4242	S	D	41.6	2.76
65	02/15	0105P	HARRISONCY	PA	724 744-2670	S	D	12.8	.83
66	02/16	0217P	CLARION	PA	814 226-6030	S	D	2.4	.16
67	02/16	0245P	CLARION	PA	814 226-6030	S	D	2.7	.18
68	02/16	0414P	HARRISONCY	PA	724 744-2670	S	D	1.7	.11
69	02/16	0103P	HARRISONCY	PA	724 744-2670	S	D	1.1	.07
70	02/16	0128P	CLEARFIELD	PA	814 765-4972	S	D	3.3	.21
71	02/16	0431P	HARRISONCY	PA	724 744-2670	S	D	3.1	.20
72	02/16	0208P	DUBOIS	PA	814 375-1175	S	D	1.4	.09
73	02/16	0212P	DUBOIS	PA	814 375-1175	S	D	0.4	.03
74	02/16	0213P	DUBOIS	PA	814 375-1175	S	D	2.1	.14
75	02/16	0313P	HARRISONCY	PA	724 744-2670	S	D	4.8	.31
76	02/20	0945A	NEW CASTLE	PA	724 658-2000	S	D	20.8	1.35
77	02/20	1038A	NEW CASTLE	PA	724 658-2000	S	D	5.7	.37
78	02/20	1054A	NEW CASTLE	PA	724 658-2000	S	D	6.0	.38
79	02/20	1123A	INDIANA	PA	724 348-4893	S	D	1.1	.07
80	02/20	1127A	REYNOLDSVL	PA	814 653-2080	S	D	1.5	.10
81	02/20	1132A	HARRISONCY	PA	724 744-2670	S	D	6.0	.38
82	02/20	0308P	SYKEVILLE	PA	814 884-2408	S	D	2.3	.15
83	02/20	0303P	SYKEVILLE	PA	814 884-2429	S	D	2.9	.19
84	02/21	0306P	BROCKWAY	PA	814 268-2202	S	D	1.3	.08
85	02/22	0919A	BROCKWAY	PA	814 268-4565	S	D	0.8	.05
86	02/22	1058A	REYNOLDSVL	PA	814 653-8245	S	D	0.7	.05
87	02/22	0203P	BROCKWAY	PA	814 268-4703	S	D	1.1	.07
88	02/22	0229P	BROCKWAY	PA	814 268-4565	S	D	19.8	1.27
89	02/22	0446P	DUBOIS	PA	814 375-1167	S	D	4.5	.28
90	02/23	0318P	REYNOLDSVL	PA	814 653-8166	S	D	1.4	.09

EXHIBIT

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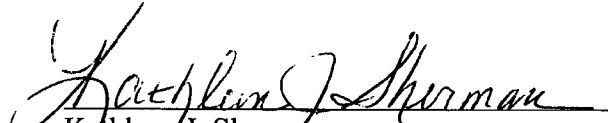
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA }
 }
COUNTY OF JEFFERSON } SS:

I, Kathleen J. Sherman, paralegal for Jeffrey M. Gordon, Esquire, hereby swear and affirm that on February 8, 2006, I contacted the Clearfield County Prothonotary's Office by telephone and indicated that on February 7, 2006, our office mailed a Praecipe for Issuance for Writ of Summons to them for filing. I requested they not file the Praecipe until we get back to them. I do not know the name of the individual I spoke with.

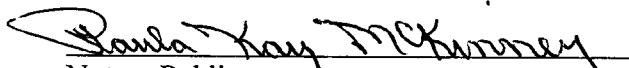
On February 8, 2006, I called the Prothonotary's Office back and spoke with William Shaw. I explained to Mr. Shaw I spoke with someone in their office earlier that day and asked them to not file the Praecipe. I indicated to Mr. Shaw I was now calling back to request the Praecipe be filed on that day. I recollect speaking with Mr. Shaw as I asked, "with whom am I speaking?"

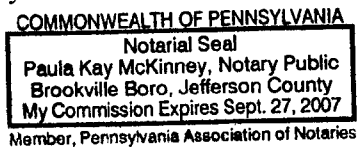
I verify that I made the two telephone calls listed on Exhibit "C" of the within Motion.


Kathleen J. Sherman

Sworn to and subscribed before

me this 6th day of March, 2006.


Notary Public



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

CYNTHIA CAVA,

Plaintiff

vs.

BLY DEVELOPMENT GROUP, INC.,

Defendant

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No.

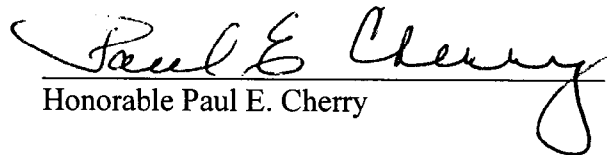
- 2006 C.D.

ORDER

AND NOW, this 8th day of March, 2006, upon consideration of the
Plaintiff's Motion Directing Clearfield County Prothonotary to Re-file Action,

IT IS HEREBY ORDERED, that the Clearfield County Prothonotary re-file the Praecipe
for Issuance for Writ of Summons as of February 8, 2006, and remove from the docket the
Praecipe filed on March 3, 2006.

BY THE COURT:


Honorable Paul E. Cherry

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

CIVIL ACTION - LAW

vs.

No. 2006-00338-CD

BLY DEVELOPMENT GROUP, INC.,
Defendant

Type of Pleading:
Praecipe to Reinstate
Writ of Summons

Filed on Behalf of:
Cynthia Cava, Plaintiff

Counsel of Record for this Party:
Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

FILED
01/31/2006
MAR 08 2006
Atty. pd. 7.00
1 Reinstate CD
Writ to Shff

William A. Shaw
Prothonotary/Clerk of Courts

CR

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

CYNTHIA CAVA,

Plaintiff

vs.

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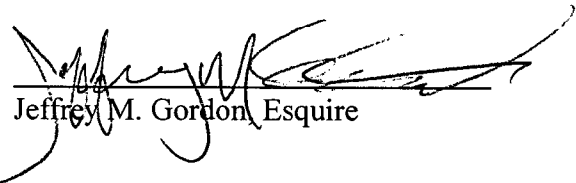
No. 2006-00338-CD

PRAECIPE TO REINSTATE WRIT OF SUMMONS

To the Prothonotary:

Pursuant to Pa. R.C.P. No. 401(b)(1), please reinstate the Writ of Summons dated
February 8, 2006, in the above-captioned matter.

March 8, 2006


Jeffrey M. Gordon, Esquire

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

SUMMONS

Cynthia Cava

Vs.

NO.: 2006-00338-CD

Bly Development Group, Inc.

TO: BLY DEVELOPMENT GROUP, INC.

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: 2/08/06



William A. Shaw
Prothonotary

Issuing Attorney:

Jeffrey M. Gordon
152 Jefferson Street
Brookville, PA 15825

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

SUMMONS

Cynthia Cava

Vs.

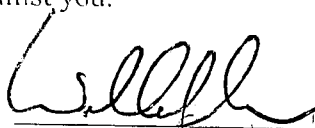
NO.: 2006-00338-CD

Bly Development Group, Inc.

TO: BLY DEVELOPMENT GROUP, INC.

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

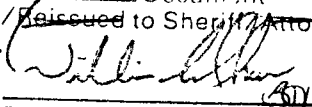
Date: 2/08/06



William A. Shaw
Prothonotary

Issuing Attorney:

Jeffrey M. Gordon
152 Jefferson Street
Brookville, PA 15825

3-876 Document
Reinstated/Reissued to Sheriff/Attorn
for service. 
Deputy Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101327
NO: 06-338-CD
SERVICE # 1 OF 1
SUMMONS

PLAINTIFF: CYNTHIA CAVA
vs.
DEFENDANT: BLY DEVELOPMENT GROUP, INC.

SHERIFF RETURN

NOW, March 29, 2006 AT 11:13 AM SERVED THE WITHIN SUMMONS ON BLY DEVELOPMENT GROUP, INC. DEFENDANT AT 1394 TREASURE LAKE, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KAREN BLY, OFFICE MANAGER A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /


01246301
APR 20 2006
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	GORDON	2061	10.00
SHERIFF HAWKINS	GORDON	2061	35.30

Sworn to Before Me This

_____ Day of _____ 2006

So Answers,


Chester A. Hawkins
Sheriff

Jeffrey M. Gordon
Attorney at Law

152 Jefferson Street, Brookville, PA 15825

MA

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

CIVIL DIVISION - LAW

No. 2006-00338-CD

v.

BLY DEVELOPMENT GROUP, INC.,
Defendant

Type of Pleading:
**Petition of Plaintiff's Counsel
For Leave to Withdraw**

Filed on Behalf of:
Plaintiff

Counsel of Record for this Party:
Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

FILED

0 12:01 PM

MAR 08 2007

6K 2 CC TO AHJ.

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CYNTHIA CAVA,	:	
Plaintiff	:	
	:	
v.	:	No. 2006-00338-CD
	:	
BLY DEVELOPMENT GROUP, INC.,	:	
Defendant	:	

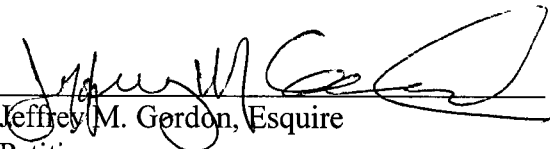
PETITION OF PLAINTIFF'S COUNSEL FOR LEAVE TO WITHDRAW

The Petition of Jeffery M. Gordon, Esquire, respectfully represents the following:

1. This action was filed on February 8, 2006 by Writ of Summons.
2. The filing of the Writ tolled the statute of limitations. Therefore, this withdrawal can be accomplished without material adverse effect to the interest of the Plaintiff.
3. Petitioner believes he can no longer continue representation in this case without undue burden and without risk of conflict with the client.
4. Petitioner has notified the client of his intention to withdraw and files this Petition before your Honorable Court.

WHEREFORE, Petitioner requests that this Court grant Petitioner leave to withdraw his appearance for Plaintiff in this action.


Respectfully submitted,


Jeffrey M. Gordon, Esquire
Petitioner

VERIFICATION

I, Jeffrey M. Gordon, Esquire, Petitioner, do hereby verify that the statements in the Petition of Plaintiff's Counsel for Leave to Withdraw Appearance are correct to the best of my personal knowledge or information or belief.

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



Jeffrey M. Gordon, Esquire
Petitioner

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CYNTHIA CAVA,

Plaintiff

v.

BLY DEVELOPMENT GROUP, INC.,

Defendant

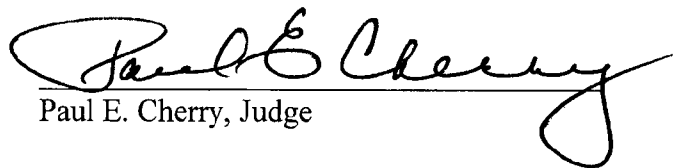
No. 2006-00338-CD

RULE TO SHOW CAUSE

AND NOW, this 8th day of March, 2007, upon consideration of the foregoing Petition For Leave to Withdraw, the Court grants a Rule to Show Cause why the appearance of Jeffrey M. Gordon, Esquire, on behalf of the Plaintiff, Cynthia Cava, should not be withdrawn.

Said Rule Returnable on the 4th day of April, 2007, at 10:30 o'clock A. m. in Courtroom No. 2 of the Clearfield County Courthouse, 320 East Market Street, Clearfield, Pennsylvania.

BY THE COURT:


Paul E. Cherry, Judge

FILED

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MAR 08 2007

2 CC TO ATTY
(will serve)

William A. Shaw
Prothonotary/Clerk of Courts

(GK)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CYNTHIA CAVA,

Plaintiff

v.

BLY DEVELOPMENT GROUP, INC.,

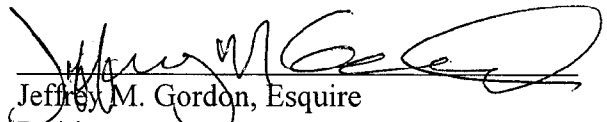
Defendant

No. 2006-00338-CD

CERTIFICATE OF SERVICE

I, Jeffrey M. Gordon, Esquire, Petitioner, hereby certify that on this 8th day of March, 2007, a true and correct copy of Petition of Plaintiff's Counsel for Leave to Withdraw Appearance and Rule to Show Cause was forwarded by first-class mail, postage prepaid, to

Cynthia Cava
1536 Treasure Lake
DuBois, PA 15801


Jeffrey M. Gordon, Esquire
Petitioner

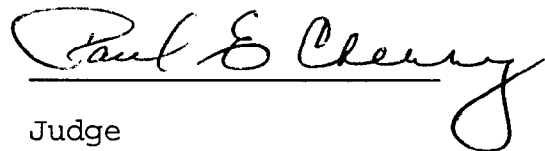
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CYNTHIA CAVA :
VS. : NO. 06-338-CD
BLY DEVELOPMENT GROUP, INC. :

O R D E R

AND NOW, this 4th day of April, 2007, this being the date set for hearing on the Petition of Plaintiff's Counsel for Leave to Withdraw; the Court noting that Plaintiff has failed to appear, despite receiving due and proper notice; upon presentation of the issues before the Court and consideration of same, it is the ORDER of this Court that said Petition shall be and is hereby granted and Jeffrey M. Gordon, Esquire, shall be and is hereby permitted to withdraw his appearance for Plaintiff in this action. Jeffrey M. Gordon, Esquire, shall file a praecipe with the Prothonotary of Clearfield County within no more than ten (10) days from today's date.

BY THE COURT,


Judge

FILED

APR 05 2007

William A. Shaw
Prothonotary/Clerk of Courts

ICC Atty Gordon

ICC Plff-

1536 Treasure Lake

DuBois, PA 15801

ICC Def-

1394 Treasure Lake

DuBois, PA 15801

CK

FILED
APR 05 2007
William A. Shaw
Prothonotary/Clerk of Courts

DATE: 4/5/07

____ You are responsible for serving all appropriate parties.

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

X Plaintiff(s) X Plaintiff(s) Attorney ____ Other

X Defendant(s) ____ Defendant(s) Attorney

____ Special Instructions:

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CYNTHIA CAVA,

Plaintiff

CIVIL DIVISION - LAW

No. 2006-00338-CD

v.

BLY DEVELOPMENT GROUP, INC.,
Defendant

Type of Pleading:
**Praecipe to Withdraw
Appearance**

Filed on Behalf of:
Plaintiff

Counsel of Record for this Party:
Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

FILED

APR 10 2007

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William A. Shaw

Prothonotary/Clerk of Courts

1 CENT TO RTTY

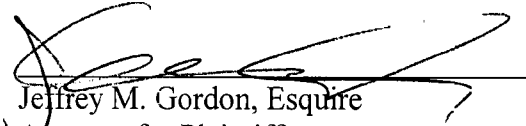
COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CYNTHIA CAVA,	:	
	:	
Plaintiff	:	
	:	
v.	:	No. 2006-00338-CD
	:	
BLY DEVELOPMENT GROUP, INC.,	:	
	:	
Defendant	:	

PRAECIPE TO WITHDRAW APPEARANCE

TO THE PROTHONOTARY:

Kindly withdraw my appearance on behalf of Cynthia Cava, the Plaintiff, in the above-referenced matter.


Jeffrey M. Gordon, Esquire
Attorney for Plaintiff

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

Cynthia Cava
Plaintiff

vs.

Bly Development Group, Inc.,
Defendant

* NO. 2006-338-CD
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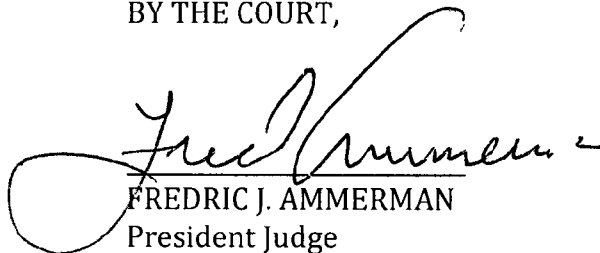
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2013

ORDER

William A. Shaw
Prothonotary/Clerk of Courts KK

NOW, this 15th day of March, 2013, upon the Court's review of the docket and noting that Plaintiff's counsel withdrew from the case on April 11, 2007 and that there has been no activity in the case since that date, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge