

06-405-CD
LJL Trucking et al vs C.W. Krause &
Co. et al

2006-405-CD
LJL Trucking et al vs C.W. Krause

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
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Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

FILED
MAY 18 2006
NO. 2561

William A. Shaw
Prothonotary/Clerk of Courts

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF
	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	
	:	
	:	JURY TRIAL DEMANDED

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please enter the appearance of Stephen E. Geduldig, Esquire, Crystal H. Williamson, Esquire, and Thomas, Thomas & Hafer, LLP, as attorneys for Defendant, Rodger Kephart Trucking, Inc., in the above-captioned matter, reserving our right to answer or otherwise plead to Plaintiffs' Complaint.

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP



By:

STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069

Attorneys for Defendant,
RODGER KEPHART TRUCKING, INC.

5/16/06
425736.2

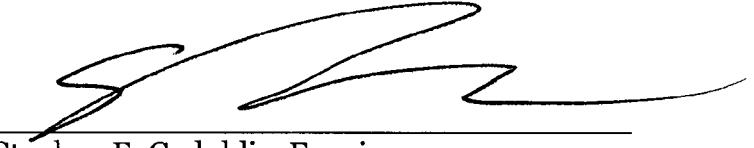
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by depositing the same in the United States Mail, postage prepaid, at Harrisburg, Pennsylvania, on the 16th day of May, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

FILED

MAY 18 2006

William A. Shaw
Prothonotary/Clerk of Courts

Stephen E. Geduldig, Esquire
E-mail: sg geduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
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THOMAS, THOMAS & HAVER, LLP
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

FILED *ccs/Rule*
m/1/25/01 to Atty
MAY 18 2006

William A. Shaw
Prothonotary/Clerk of Courts

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
	:	
	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	
	:	JURY TRIAL DEMANDED

PRAECLPICE AND RULE TO FILE A COMPLAINT

TO THE PROTHONOTARY OF SAID COURT:

Please issue a Rule on Plaintiff to file a Complaint in the above case within twenty (20) days after service of the Rule or suffer a judgment of *non pros.*

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP

By: *[Signature]*

STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530
CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069
Attorneys for Defendant,
RODGER KEPHART TRUCKING, INC.

RULE

NOW, May 18, 2006, RULE IS ISSUED AS ABOVE.

[Signature]
Prothonotary

FILED

MAY 18 2006

William A. Shaw
Prothonotary/Clerk of Courts

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
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Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

**LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs**

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

:

:

:

:

: NO. 2006-405-CD

:

:

:

**C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,
Defendants**

: JURY TRIAL DEMANDED

PRAECIPE

FILED
MAY 26 2006
0/110/wm
William A. Shaw
Prothonotary/Clerk of Courts
1 CERT TO ATT

TO THE PROTHONOTARY OF SAID COURT:

Please file of record the attached Certificate of Service which served the Rule to File a Complaint upon Plaintiff issued by the Prothonotary of Clearfield County on May 18, 2006, with regard to the above-captioned matter.

6/23/06
429863.1

THOMAS, THOMAS & HAVER, LLP

By:


STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069

Attorneys for Defendants,
RODGER KEPHART TRUCKING, INC.

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAFER, LLP
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAY 18 2006

Attest,

William C. Brown
Prothonotary
Clerk of Courts

Atorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

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

V.

: NO. 2006-405-CD

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,
Defendants

: JURY TRIAL DEMANDED

PRAECIPE AND RULE TO FILE A COMPLAINT

TO THE PROTHONOTARY OF SAID COURT:

Please issue a Rule on Plaintiff to file a Complaint in the above case within twenty (20) days after service of the Rule or suffer a judgment of *non pros*.

Respectfully submitted,

THOMAS, THOMAS & HAFFER, LLP

By:

STEPHEN E. GEDULDIG, ESQUIRE

Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE

Attorney I.D. No. 91069

Attorneys for Defendant

RODGER KEPHART TRUCKING, INC.

RULE

NOW, May 18, 2006, RULE IS ISSUED AS ABOVE.

Prothonotary

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **RULE TO FILE A COMPLAINT** was served by depositing the same in the United States Mail, postage prepaid, at Harrisburg, Pennsylvania, on the 23rd day of May, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC., : CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
v. :
C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, INC., :
and BARRY QUINN, :
Defendants : JURY TRIAL DEMANDED
: NO. 2006-405-CD

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PRAECIPE
SERVING THE EXECUTED RULE TO FILE A COMPLAINT EXECUTED BY
THE CLEARFIELD COUNTY PROTHONOTARY ON MAY 18, 2006**, was served
by depositing the same in the United States Mail, postage prepaid, at Harrisburg,
Pennsylvania, on the 23rd day of May, 2006, on all counsel of records as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603
Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway, Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

William A Shaw
Prothonotary/Clerk of Courts

MAY 26 2006

FILED

NELSON LEVINE de LUCA & HORST, LLC
BY: KENNETH T. LEVINE, ESQUIRE
IDENTIFICATION NO.: 60984
FOUR SENTRY PARKWAY, SUITE 300
BLUE BELL, PA 19422
(610) 862-6570

LJL TRUCKING, P/A MED-VAN
TRANSPORT, INC., AND
MASSACHUSETTS BAY INSURANCE
COMPANY

Plaintiff(s)

v.

C.W. KRAUSE AND COMPANY, RODGER
KEPHART TRUCKING, INC. AND BARRY
QUINN

Defendant(s)

ATTORNEYS FOR PLAINTIFF

IN THE COURT OF COMMON
PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

JURY TRIAL DEMANDED

CIVIL ACTION NO: 2006-405-CD

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiffs in the above-captioned matter.

NELSON LEVINE de LUCA & HORST, LLC

BY: Kenneth T. Levine
KENNETH T. LEVINE, ESQUIRE
ATTORNEYS FOR PLAINTIFF

Dated: June 15, 2006

FILED

JUN 19 2006

William A. Shaw
Prothonotary/Clerk of Court

1 CLERK TO ATT

COPY TO C/A

**NELSON LEVINE de LUCA & HORST, LLC
BY: KENNETH T. LEVINE, ESQUIRE
IDENTIFICATION NO.: 60984
FOUR SENTRY PARKWAY, SUITE 300
BLUE BELL, PA 19422
(610) 862-6570**

**LJL TRUCKING, P/A MED-VAN
TRANSPORT, INC., AND MASSACHUSETTS
BAY INSURANCE COMPANY**

Plaintiff(s)

v.

**C.W. KRAUSE AND COMPANY, RODGER
KEPHART TRUCKING, INC. AND BARRY
QUINN**

Defendant(s).

ATTORNEYS FOR PLAINTIFF

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

JURY TRIAL DEMANDED

CIVIL ACTION NO: 2006-405-CB

CERTIFICATE OF SERVICE

I, Kenneth T. Levine, Esquire, hereby certify that a true and correct copy of my Entry of Appearance was made on June 15, 2006, upon counsel listed below by United States Mail, postage prepaid.

Stephen Geduldig, Esquire
Thomas, Thomas & Hafer, LLP
305 N. Front Street
PO Box 999
Harrisburg, PA 17108

Roberta Binder Heath, Esquire
Andrews & Beard
3366 Lynnwood Drive
Altoona, PA 16602

NELSON LEVINE de LUCA & HORST, LLC

**BY: Kenneth T. Levine
KENNETH T. LEVINE, ESQUIRE
ATTORNEYS FOR PLAINTIFF**

Dated: June 15, 2006

NELSON LEVINE DE LUCA & HORST, LLC
BY: KENNETH LEVINE, ESQUIRE
I.D. NO. 60984
FOUR SENTRY PARKWAY, SUITE 300
BLUE BELL, PA 19422

ATTORNEYS FOR PLAINTIFF

LJL TRUCKING,	:	IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC.	:	CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY	:	
INSURANCE COMPANY	:	
Plaintiffs,	:	No. 2006-405-CD
v.	:	
C.W. KRAUSE AND COMPANY, INC.	:	JURY TRIAL DEMANDED
RODGER KPHART TRUCKING, INC.	:	
and BARRY QUINN,	:	
Defendants	:	

PRAECIPE FOR WITHDRAWAL OF APPEARANCE

Please **withdraw** the appearance of Roberta Binder Heath, Esquire, **ANDREWS & BEARD**, 3366 Lynnwood Drive, P. O. Box 1311, Altoona, Pennsylvania 16603-1311, in the above-captioned matter on behalf of Plaintiffs, LJL Trucking, P/A Med-van Transport, Inc., and Massachusetts Bay Insurance Company.

Date: 7-17-06

By: Roberta B. Heath
Roberta Binder Heath
Pa. I.D. 50798

Respectfully submitted,

ANDREWS & BEARD

Roberta B. Heath
Roberta Binder Heath, Esquire
Pa. I.D. No. 50798

3366 Lynnwood Drive
P.O. Box 1311
Altoona, PA 16603-1311
(814) 940-8670

FILED NOCC
M10-2876
JUL 18 2006
S

William A. Shaw
Prothonotary/Clerk of Courts

NELSON LEVINE DE LUCA & HORST, LLC
BY: KENNETH LEVINE, ESQUIRE
I.D. NO. 60984
FOUR SENTRY PARKWAY, SUITE 300
BLUE BELL, PA 19422

ATTORNEYS FOR PLAINTIFF

LJL TRUCKING,	:	IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC.	:	CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY	:	
INSURANCE COMPANY	:	
Plaintiffs,	:	No. 2006-405-CD
	:	
v.	:	
C.W. KRAUSE AND COMPANY, INC.	:	JURY TRIAL DEMANDED
RODGER KPHART TRUCKING, INC.	:	
and BARRY QUINN,	:	
Defendants	:	

CERTIFICATE OF SERVICE

Roberta Binder Heath, Esquire, 3366 Lynnwood Drive, P. O. Box 1311, Altoona, Pennsylvania 16603-1311, hereby certifies that a true and correct copy of the foregoing Praecipe to Withdraw Appearance has been served on the following parties of record by U.S. Mail, postage prepaid on this 17th day of **July 2006**:

Kenneth Levine, Esquire
Nelson, Levine
Four Sentry Parkway, Suite 300
Blue Bell, PA 19422

Stephen Geduldig, Esquire
Thomas, Thomas & Hafer, LLP
305 North Front Street
Harrisburg, PA 17101

ANDREWS & BEARD



Roberta Binder Heath, Esquire
Pa. I.D. No. 50798
Attorney for Petitioners

Dated: July 17, 2006

3366 Lynnwood Drive
P.O. Box 1311
Altoona, PA 16603
(814) 940-8670

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

FILED
M 11:47 AM
JUL 17 2006
William A. Shaw
Prothonotary/Clerk of Courts

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
	:	
	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	
	:	
	:	
	:	JURY TRIAL DEMANDED

PRAECIPE

TO THE PROTHONOTARY OF SAID COURT:

Please file of record the attached Important Notice with regard to the above-captioned matter.

THOMAS, THOMAS & HAVER, LLP

By: 

STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069

Attorneys for Defendants,
RODGER KEPHART TRUCKING, INC.

7/13/06
429863.2

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
	:	
	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	
	:	
	:	
	:	
	:	JURY TRIAL DEMANDED

IMPORTANT NOTICE

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT
IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS
NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING
AND YOU MAY LOSE YOUR RIGHT TO SUE THE ADDITIONAL DEFENDANT AND
THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE
THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR
CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND
OUT WHERE YOU CAN GET LEGAL HELP:

**Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
PO Box 186
Harrisburg, PA 17108
(800) 692-7375**

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING,	:	IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC.,	:	CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY	:	
INSURANCE COMPANY,	:	
Plaintiffs	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY,	:	
RODGER KEPHART TRUCKING, INC.,	:	
and BARRY QUINN,	:	
Defendants	:	JURY TRIAL DEMANDED

IMPORTANT NOTICE

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT
IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS
NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING
AND YOU MAY LOSE YOUR RIGHT TO SUE THE ADDITIONAL DEFENDANT AND
THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE
THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR
CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND
OUT WHERE YOU CAN GET LEGAL HELP:

**Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
PO Box 186
Harrisburg, PA 17108
(800) 692-7375**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Important Notice was served by depositing the same in the United States Mail, return receipt requested, postage pre-paid, at Harrisburg, Pennsylvania, on the 13th day of July, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

CERTIFICATE OF SERVICE

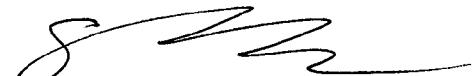
I hereby certify that a true and correct copy of the Praeclipe to file Important Notice was served by depositing the same in the United States Mail, return receipt requested, postage pre-paid, at Harrisburg, Pennsylvania, on the 13th day of July, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

FILED

JUL 31 2006

m 13:00 / m
William A. Shaw
Prothonotary/Clerk of Courts

I went to AMM

NOTICE TO ATTOR

LEWIN

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC., : CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
v. : NO. 2006-405-CD
C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, INC., :
and BARRY QUINN, :
Defendants : JURY TRIAL DEMANDED

PRAECIPE FOR JUDGMENT OF NON PROS

TO THE PROTHONOTARY OF SAID COURT:

Please enter judgment of *Non Pros* against the Plaintiffs, LJL Trucking, P/A Med-Van Transport, Inc., and Massachusetts Bay Insurance Company, for failure to file a Complaint against Defendant, Rodger Kephart Trucking, Inc., in a timely manner as required by Pa. R.C.P. 2252(b)(1) and Pa. R.C.P. No. 1037(a). The Notice required by Pa. R.C.P. No. 237.1(a)(2) is attached hereto as Exhibit "A".

The undersigned hereby certifies that a written notice of intention to file this Praecipe was mailed to Plaintiffs' counsel on July 27, 2006.

THOMAS, THOMAS & HAVER, LLP

7/27/06

By:

S
STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

429863.3

Attorneys for Defendant,
RODGER KEPHART TRUCKING, INC.

CERTIFICATE OF SERVICE

I, Barbara Lauver, Paralegal with Thomas, Thomas & Hafer, LLP, do hereby certify that a true and correct copy of the Praeclipe For Judgment of Non Pros was served by depositing the same in the United States Mail, postage prepaid, at Harrisburg, Pennsylvania, on the 28th day of July, 2006, on all counsel of record as follows:

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

Attorneys for Plaintiffs

THOMAS, THOMAS & HAVER, LLP


Barbara A. Lauver, Paralegal

425744.1

Exhibit A

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAY 26 2006

Attest.

W.H. Williamson
Prothonotary/
Clerk of Courts

Atorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

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

:

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:

:

v. : NO. 2006-405-CD

:

:

:

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,
Defendants

: JURY TRIAL DEMANDED

PRAECIPE

TO THE PROTHONOTARY OF SAID COURT:

Please file of record the attached Certificate of Service which served the Rule to File a Complaint upon Plaintiff issued by the Prothonotary of Clearfield County on May 18, 2006, with regard to the above-captioned matter.

THOMAS, THOMAS & HAVER, LLP

By: 

STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069

Atorneys for Defendants,
RODGER KEPHART TRUCKING, INC.

6/23/06
429863.1

Stephen E. Geduldig, Esquire
E-mail: sggeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAY 18 2006

Attest.

Willie E. Hafer
Prothonotary/
Clerk of Courts

Atorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

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

v.
C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,
Defendants

: NO. 2006-405-CD
:
:
:
:
: JURY TRIAL DEMANDED

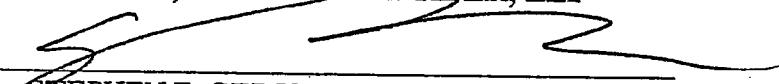
PRAECLPICE AND RULE TO FILE A COMPLAINT

TO THE PROTHONOTARY OF SAID COURT:

Please issue a Rule on Plaintiff to file a Complaint in the above case within twenty (20) days after service of the Rule or suffer a judgment of *non pros*.

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP

By: 

STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530
CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069
Attorneys for Defendant,
RODGER KEPHART TRUCKING, INC.

5/16/06
427551.1

RULE

NOW, May 18, 2006, RULE IS ISSUED AS ABOVE.


Prothonotary

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **RULE TO FILE A COMPLAINT** was served by depositing the same in the United States Mail, postage prepaid, at Harrisburg, Pennsylvania, on the 23rd day of May, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS OF
P/A MED-VAN TRANSPORT, INC., : CLEARFIELD COUNTY, PENNSYLVANIA
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
v. : NO. 2006-405-CD
C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, INC., :
and BARRY QUINN, :
Defendants : JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PRAECIPE
SERVING THE EXECUTED RULE TO FILE A COMPLAINT EXECUTED BY
THE CLEARFIELD COUNTY PROTHONOTARY ON MAY 18, 2006**, was served
by depositing the same in the United States Mail, postage prepaid, at Harrisburg,
Pennsylvania, on the 21/09 day of May, 2006, on all counsel of records as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603
Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway, Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

THOMAS, THOMAS & HAVER LLP
ATTORNEYS AT LAW



www.tthlaw.com

Mailing Address: P.O. Box 999, Harrisburg, PA 17108
Street Address: 305 North Front Street, Harrisburg, PA 17101
Phone: (717) 237-7100 Fax: (717) 237-7105

Stephen E. Geduldig, Esquire
(717) 237-7119
sgeduldig@tthlaw.com

July 13, 2006

Prothonotary
Clearfield County Courthouse
230 East Market Street
Clearfield, Pennsylvania 16830

**Re: LJL Trucking, et al v. Kephart Trucking, et al
Clearfield County No. 2006-405-CD**

Dear Sir or Madam:

Enclosed for filing please find a copy of the Important Notice which was served upon counsel for Plaintiffs with regard to the above-captioned case. As you can see by the Certificate of Service, all parties of record have been served.

Also enclosed please find a self-addressed stamped envelope to return a clocked-in copy to me. Thank you for your cooperation.

Very truly yours,

THOMAS, THOMAS & HAVER, LLP

By:

Stephen E. Geduldig

427570.3
Enclosures

cc: Roberta Binder Heath, Esquire (w/enc.)
Kenneth Levine, Esquire (w/enc.)

bc: Mr. James R. Haley (w/enc.)

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

FILED
JULY 17 2006
William A. Shaw
Prothonotary/Clerk of Courts

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

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

v.
C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,
Defendants

: NO. 2006-405-CD

: JURY TRIAL DEMANDED

PRAECIPE

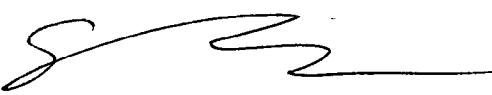
TO THE PROTHONOTARY OF SAID COURT:

Please file of record the attached Important Notice with regard to the above-captioned matter.

THOMAS, THOMAS & HAVER, LLP

7/13/06
429863.2

By:


STEPHEN E. GEDULDIG, ESQUIRE
Attorney I.D. No. 43530

CRYSTAL H. WILLIAMSON, ESQUIRE
Attorney I.D. No. 91069

Attorneys for Defendants,
RODGER KEPHART TRUCKING, INC.

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

Atorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
	:	
	:	
	:	
v.	:	NO. 2006-405-CD
	:	
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	
	:	
	:	
	:	
	:	JURY TRIAL DEMANDED

IMPORTANT NOTICE

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT
IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS
NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING
AND YOU MAY LOSE YOUR RIGHT TO SUE THE ADDITIONAL DEFENDANT AND
THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE
THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR
CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND
OUT WHERE YOU CAN GET LEGAL HELP:

**Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
PO Box 186
Harrisburg, PA 17108
(800) 692-7375**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Important Notice was served by depositing the same in the United States Mail, return receipt requested, postage pre-paid, at Harrisburg, Pennsylvania, on the 13th day of July, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

CERTIFICATE OF SERVICE

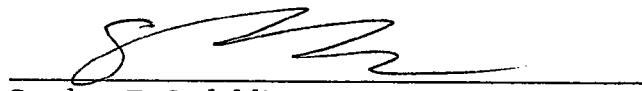
I hereby certify that a true and correct copy of the Praeclipe to file Important Notice was served by depositing the same in the United States Mail, return receipt requested, postage pre-paid, at Harrisburg, Pennsylvania, on the 13/7 day of July, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

THOMAS, THOMAS & HAVER LLP
ATTORNEYS AT LAW



www.tthlaw.com

Mailing Address: P.O. Box 999, Harrisburg, PA 17108
Street Address: 305 North Front Street, Harrisburg, PA 17101
Phone: (717) 237-7100 Fax: (717) 237-7105

Stephen E. Geduldig, Esquire
(717) 237-7119
sgeduldig@tthlaw.com

July 13, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Roberta Binder Heath, Esquire
ANDREWS, WAGNER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Kenneth Levine, Esquire
NELSON, LEVINE
Four Sentry Parkway, Suite 300
Blue Bell, Pennsylvania 19422

**Re: LJL Trucking, et al v. Kephart Trucking, et al
Clearfield County No. 2006-405-CD**

Dear Attorneys Heath and Levine:

Enclosed for service upon you please find an Important Notice with regard to the above case.

Very truly yours,

THOMAS, THOMAS & HAVER LLP

By:

Stephen E. Geduldig

429854.3
Enclosure

bc: Mr. James R. Haley (w/enc.; Claim No. T208)

Stephen E. Geduldig, Esquire
E-mail: sgeduldig@tthlaw.com
Attorney I.D. No. 43530

Crystal H. Williamson, Esquire
E-mail: cwwilliamson@tthlaw.com
Attorney I.D. No. 91069

THOMAS, THOMAS & HAVER, LLP
305 North Front Street
Post Office Box 999
Harrisburg, Pennsylvania 17108-0999

(717) 237-7100
FAX (717) 237-7105

Attorneys for Defendant:
RODGER KEPHART TRUCKING, INC.

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC., and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
v.	:	NO. 2006-405-CD
C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC., and BARRY QUINN, Defendants	:	JURY TRIAL DEMANDED

IMPORTANT NOTICE

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT
IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS
NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING
AND YOU MAY LOSE YOUR RIGHT TO SUE THE ADDITIONAL DEFENDANT AND
THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE
THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR
CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND
OUT WHERE YOU CAN GET LEGAL HELP:

**Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
PO Box 186
Harrisburg, PA 17108
(800) 692-7375**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Important Notice was served by depositing the same in the United States Mail, return receipt requested, postage pre-paid, at Harrisburg, Pennsylvania, on the 13th day of July, 2006, on all counsel of record as follows:

Roberta Binder Heath, Esquire
ANDREWS, WANGER & BEARD
Post Office Box 1311
Altoona, Pennsylvania 16603

Attorneys for Plaintiffs

Kenneth Levine, Esquire
NELSON, LEVINE, deLUCA & HORST
Four Sentry Parkway
Suite 300
Blue Bell, Pennsylvania 19422

THOMAS, THOMAS & HAVER, LLP



Stephen E. Geduldig, Esquire

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Kenneth Levine, Esq.
Nelson Levine
4 Sentry Parkway
5-300
Blue Bell PA 19422

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

A. Signature


VMC/McCARTHY

B. Received by (Printed Name)

C. Date of Delivery

3. Service Type	<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
	<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise
	<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee)	<input type="checkbox"/> Yes	

2. Article Number

(Transfer from service label)
7004 2890 0002 8001 4241

PS Form 3811, February 2004	Domestic Return Receipt	102555-02-M-1540
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
NON PROS

LJL Trucking
P/A Med-Van Transport, Inc.
Massachusetts Bay Insurance Company

Plaintiff

Vs.

No. 2006-00405-CD

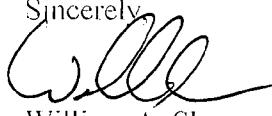
C. W. Krause and Company
Rodger Kephart Trucking, Inc.
Barry Quinn

Defendant

TO: Kenneth Levine, Esq. (Atty. for Plaintiffs) :

Notice is hereby given that a judgment of non-pros has been entered in the above captioned matter pursuant to Praeclipe dated July 27, 2006.

Judgment entered of record July 31, 2006, in favor of Rodger Kephart Trucking, Inc.
ONLY.

Sincerely

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

vs.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

Type of Case: Civil Action

No. 2006-405-CD

Type of Pleading:

Praecipe for
Non Pros

Filed on Behalf of:

Defendant C.W. Krause
and Company

Counsel of Record for This
Party:

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

(814) 371-7768

Dated: November 28, 2006

FILED Atty Taladay
m/16/2006 pd 20.00
NOV 30 2006 Notice to Atty Heath

William A. Shaw
Prothonotary/Clerk of Courts

6K

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

No. 2006-405-CD

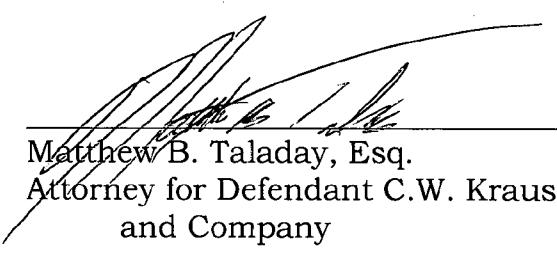
vs.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

PRAECIPE FOR NON PROS

TO THE PROTHONOTARY:

Please enter judgment of non pros against the Plaintiffs in the matter above captioned for failure to file a Complaint. It is hereby certified that a written notice of intention to file this Praecipe, as required by Pa.R.C.P. Rule 237.1(a)(2) was forwarded by First Class Mail to the Plaintiffs' counsel of record, on October 19, 2006 as evidenced by the Certificate of Service filed with your office.


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

No. 2006-405-CD

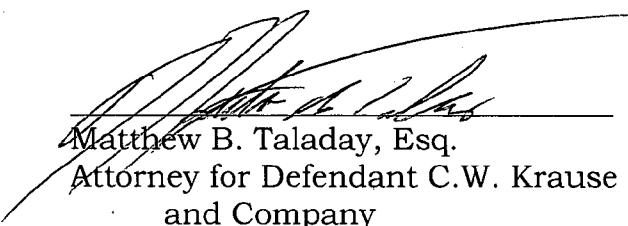
vs.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

CERTIFICATE OF SERVICE

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

Kenneth T. Levine, Esq.
Nelson, Levine, deLuca & Horst
Suite 300
4 Sentry Parkway
Blue Bell, PA 19422


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

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

LJL TRUCKING, :
P/A MED-VAN TRANSPORT, INC., :
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
vs. :
No. 2006-405-CD

C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, :
INC., and BARRY QUINN, :
Defendants :
:

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs

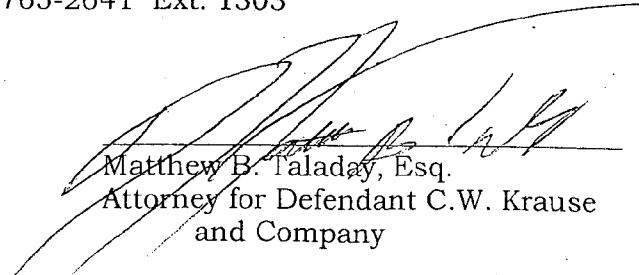
IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A
COMPLAINT IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE
DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU
WITHOUT A HEARING AND YOU MAY LOSE YOUR RIGHT TO SUE THE
DEFENDANT AND THEREBY LOSE PROPERTY OR OTHER IMPORTANT
RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.
IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET
FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION
ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE
MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES
THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED
FEE OR NO FEE.

Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830
(814) 765-2641 Ext. 1303


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

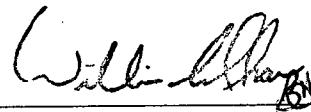
No. 2006-405-CD

vs.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

NOTICE OF JUDGMENT

Judgment of non pros is hereby entered this 30th day
of November, 2006 against the Plaintiffs and in favor of
Defendant C.W. Krause and Company.



William A. Shaw
Prothonotary of Clearfield County

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LJL TRUCKING,
MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,

Plaintiffs

vs.

C.W. KRAUSE AND COMPANY
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,

Defendants

Type of Case: Civil ActioP/A

No. 2006-405-CD

Type of Pleading:

Praecipe for Entry
of Appearance

Filed on Behalf of:

Defendants

Counsel of Record for This
Party:

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

(814) 371-7768

Dated: September 11, 2006

FILED NO cc
01014051
SEP 12 2006

William A. Shaw
Prothonotary/Clerk of Courts

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

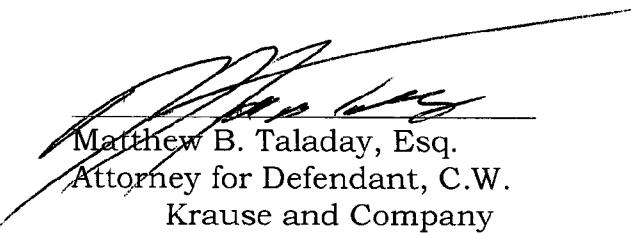
LJL TRUCKING, :
P/A MED-VAN TRANSPORT, INC., :
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
vs. : No. 2006-405-CD
C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, :
INC., and BARRY QUINN, :
Defendants :

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Defendant, C.W. Krause and Company, in the above captioned matter.

Dated: September 11, 2006


Matthew B. Taladay, Esq.
Attorney for Defendant, C.W.
Krause and Company

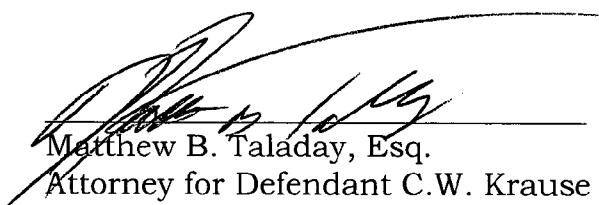
IN THE COURT OF COMMON PLEAS
OF JEFFERSON COUNTY, PENNSYLVANIA
CIVIL ACTION

LJL TRUCKING, :
P/A MED-VAN TRANSPORT, INC., :
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
: No. 2006-405-CD
vs. :
: C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, :
INC., and BARRY QUINN, :
Defendants :
:

CERTIFICATE OF SERVICE

I certify that on the 11th day of September, 2006, a true and correct copy of Defendant C.W. Krause and Company's Praeclipe for Entry of Appearance was sent via first class mail, postage prepaid, to the following:

Roberta Binder Heath, Esq.
Attorney for Plaintiffs
Andres & Beard
P.O. Box 1311
Altoona, PA 16603



Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LJL TRUCKING,
MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

vs.

C.W. KRAUSE AND COMPANY
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

Type of Case: Civil ActioP/A

No. 2006-405-CD

Type of Pleading:

Praecipe for Rule to
File Complaint

Filed on Behalf of:

Defendant, C.W. Krause
and Company

Counsel of Record for This
Party:

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

(814) 371-7768

Dated: September 11, 2006

FILED *no cc*
OCT 10 2006
SEP 12 2006 2 Rules
to Atty Talad
S
William A. Shaw
Prothonotary/Clerk of Courts

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

No. 2006-405-CD

vs.

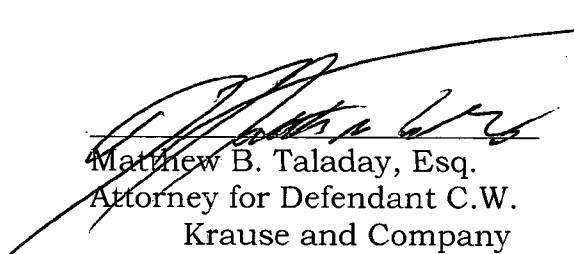
C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

PRAECIPE FOR RULE TO FILE COMPLAINT

TO THE PROTHONOTARY:

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

Dated: September 11, 2006


Matthew B. Taladay, Esq.
Attorney for Defendant C.W.
Krause and Company

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

LJL Trucking
P/A Med-Van Transport, Inc.
Massachusetts Bay Insurance Company

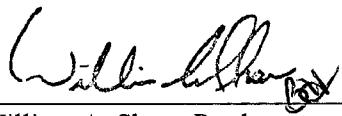
Vs.
C. W. Krause and Company
Rodger Kephart Trucking, Inc.
Barry Quinn

Case No. 2006-00405-CD

RULE TO FILE COMPLAINT

TO: LJL Trucking, P/A Med-Van Transport, Inc., and Massachusetts Bay Insurance Company

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



William A. Shaw, Prothonotary

Dated: September 12, 2006

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LJL TRUCKING,
MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

vs.

C.W. KRAUSE AND COMPANY
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

Type of Case: Civil ActioP/A

No. 2006-405-CD

Type of Pleading:

Certificate of
Service

Filed on Behalf of:

Defendants

Counsel of Record for This
Party:

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

(814) 371-7768

Dated: September 15, 2006

FILED NO CC
m 10:34 AM
OCT 02 2006
LW

William A. Shaw
Prothonotary/Clerk of Courts

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

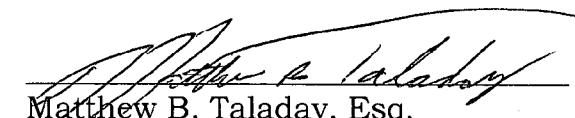
LJL TRUCKING, :
P/A MED-VAN TRANSPORT, INC., :
and MASSACHUSETTS BAY :
INSURANCE COMPANY, :
Plaintiffs :
: No. 2006-405-CD
vs. :
: C.W. KRAUSE AND COMPANY, :
RODGER KEPHART TRUCKING, :
INC., and BARRY QUINN, :
Defendants :

CERTIFICATE OF SERVICE

I certify that on the 15th day of September, 2006, an original
Rule to File Complaint was sent via first class mail, postage prepaid, to
the following:

Roberta Binder Heath, Esq.
Attorney for Plaintiffs
Andres & Beard
P.O. Box 1311
Altoona, PA 16603

Kenneth T. Levine, Esq.
Nelson, Levine, deLuca & Horst
Suite 300
4 Sentry Parkway
Blue Bell, PA 19422


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,

Plaintiffs

vs.

C.W. KRAUSE AND COMPANY
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,

Defendants

Type of Case: Civil Action

No. 2006-405-CD

Type of Pleading:

Certificate of
Service

Filed on Behalf of:

Defendants

Counsel of Record for This
Party:

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

(814) 371-7768

Dated: October 19, 2006

FILED

OCT 23 2006
m/8:70 / 
William A. Shaw
Prothonotary/Clerk of Courts

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

No. 2006-405-CD

vs.

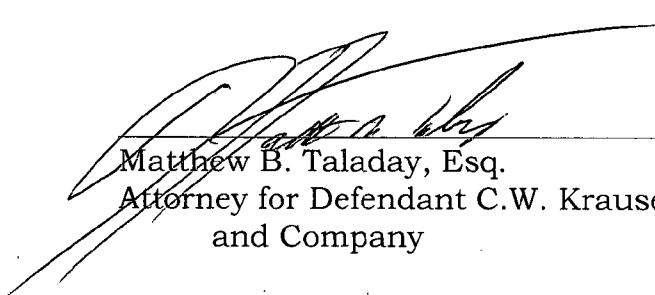
C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

CERTIFICATE OF SERVICE

I certify that on the 19th day of October, 2006, an original
Notice of Praeclipe to Enter Judgment of Non Pros, copy of which is
attached hereto, was sent via first class mail, postage prepaid, to the
following:

Roberta Binder Heath, Esq.
Attorney for Plaintiffs
Andres & Beard
P.O. Box 1311
Altoona, PA 16603

Kenneth T. Levine, Esq.
Nelson, Levine, deLuca & Horst
Suite 300
4 Sentry Parkway
Blue Bell, PA 19422


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

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

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,
Plaintiffs

No. 2006-405-CD

vs.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING,
INC., and BARRY QUINN,
Defendants

TO: LJL TRUCKING, P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY INSURANCE COMPANY, Plaintiffs

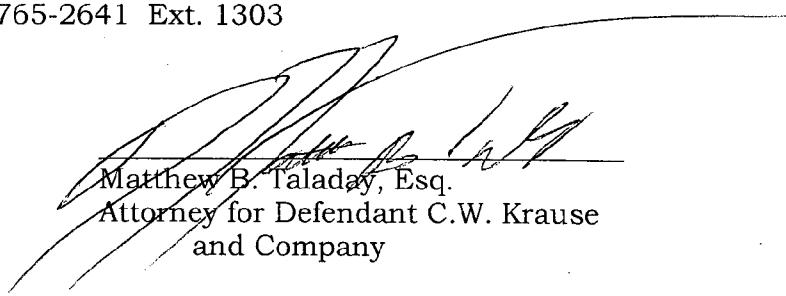
IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO FILE A COMPLAINT IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR RIGHT TO SUE THE DEFENDANT AND THEREBY LOSE PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830
(814) 765-2641 Ext. 1303


Matthew B. Taladay, Esq.
Attorney for Defendant C.W. Krause
and Company

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY, : IN THE COURT OF COMMON PLEAS
Plaintiffs : OF CLEARFIELD COUNTY,
: PENNSYLVANIA
v. : 2006-405-CD
C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC., : TYPE OF DOCUMENT:
and BARRY QUINN, : Praeclipe for Writ of Summons
Defendants : for Subrogation Action
: COUNSEL OF RECORD FOR PLAINTIFF:
: Roberta Binder Heath, Esquire
: Pa. I.D. No. 50798
: ANDREWS & BEARD
: 3366 Lynnwood Drive
: P.O. Box 1311
: Altoona, PA 16603
: (814) 940-8670

FILED

MAR 17 2006 (E4)
u/12-101wms
William A. Shaw
Prothonotary
1 cert w/ 3 wnts of
Summons, to Attorney

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS
P/A MED-VAN TRANSPORT, INC., : OF CLEARFIELD COUNTY,
and MASSACHUSETTS BAY : PENNSYLVANIA
INSURANCE COMPANY, :
Plaintiffs :
v. :
TYPE OF DOCUMENT:
C.W. KRAUSE AND COMPANY, : Praecipe for Writ of Summons
RODGER KEPHART TRUCKING, INC., : for Subrogation Action
and BARRY QUINN, :
Defendants :
:

PRAECIPE FOR WRIT OF SUMMONS

TO: THE PROTHONOTARY

Kindly issue a Writ of Summons for Subrogation Action on the following Defendants relative to the above-captioned action:

- 1). C.W. Krause and Company
515 David Street
Houtzdale, PA 16651
- 2). Rodger Kephart Trucking, Inc.
RR 1, Box 298
Houtzdale, PA 16651
- 3). Barry Quinn
RR 2, Box 218
Allport, PA 16821

Respectfully submitted,

ANDREWS & BEARD



Roberta Binder Heath, Esquire
Pa. I.D. No. 50798
Counsel for Plaintiff

Date: March 16, 2006

3366 Lynnwood Drive
P.O. Box 1311
Altoona, PA 16603-1311
(814) 940-8670

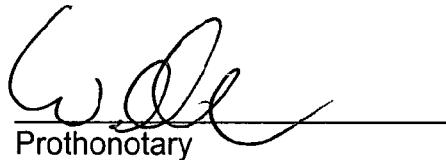
LJL TRUCKING, : IN THE COURT OF COMMON PLEAS
P/A MED-VAN TRANSPORT, INC., : OF CLEARFIELD COUNTY,
and MASSACHUSETTS BAY : PENNSYLVANIA
INSURANCE COMPANY, :
Plaintiffs :
v. :
C.W. KRAUSE AND COMPANY, : TYPE OF DOCUMENT:
RODGER KEPHART TRUCKING, INC., : Praeclipe for Writ of Summons
and BARRY QUINN, : for Subrogation Action
Defendants :
:

WRIT OF SUMMONS

TO: C.W. KRAUSE AND COMPANY

You are hereby notified that LJL Trucking, P/A Med-Van Transport, Inc. and Massachusetts Bay Insurance Company have commenced a subrogation action against you which you are required to defend or a default judgment may be entered against you.

Date: 3-17-06



Prothonotary

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

SEAL:

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS
P/A MED-VAN TRANSPORT, INC., : OF CLEARFIELD COUNTY,
and MASSACHUSETTS BAY : PENNSYLVANIA
INSURANCE COMPANY, :
Plaintiffs :
v. :
TYPE OF DOCUMENT:
C.W. KRAUSE AND COMPANY, : Praecipe for Writ of Summons
RODGER KEPHART TRUCKING, INC., : for Subrogation Action
and BARRY QUINN, :
Defendants :
:

WRIT OF SUMMONS

TO: RODGER KEPHART TRUCKING, INC.

You are hereby notified that LJL Trucking, P/A Med-Van Transport, Inc. and Massachusetts Bay Insurance Company have commenced a subrogation action against you which you are required to defend or a default judgment may be entered against you.

Date: 3-17-06



Prothonotary

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

SEAL:

LJL TRUCKING, : IN THE COURT OF COMMON PLEAS
P/A MED-VAN TRANSPORT, INC., : OF CLEARFIELD COUNTY,
and MASSACHUSETTS BAY : PENNSYLVANIA
INSURANCE COMPANY, :
Plaintiffs :
v. :
TYPE OF DOCUMENT:
C.W. KRAUSE AND COMPANY, : Praecipe for Writ of Summons
RODGER KEPHART TRUCKING, INC., : for Subrogation Action
and BARRY QUINN, :
Defendants :
:

WRIT OF SUMMONS

TO: BARRY QUINN

You are hereby notified that LJL Trucking, P/A Med-Van Transport, Inc. and Massachusetts Bay Insurance Company have commenced a subrogation action against you which you are required to defend or a default judgment may be entered against you.

Date: 3-17-06



Prothonotary

SEAL:

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

William W. MOTAWA SHAW
Protector of the
William W. MOTAWA SHAW
Classifying Co., Cheyenne, PA
Settled in New York, 1910
1910
Classification Co., Cheyenne, PA

MAR 17 2006

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101417
NO: 06-405-CD
SERVICE # 1 OF 3
SUMMONS

PLAINTIFF: L JL TRUCKING, P/A MED-VAN TRANSPORT, INC. al

vs.

DEFENDANT: C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC. and
BARRY QUINN

SHERIFF RETURN

NOW, April 13, 2006 AT 2:01 PM SERVED THE WITHIN SUMMONS ON C.W. KRAUSE AND COMPANY
DEFENDANT AT 515 DAVID ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MARY
KRAUSE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN THE
CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED
07/31/2006
MAY 04 2006
LS

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101417
NO: 06-405-CD
SERVICE # 2 OF 3
SUMMONS

PLAINTIFF: L JL TRUCKING, P/A MED-VAN TRANSPORT, INC. al

vs.

DEFENDANT: C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC. and
BARRY QUINN

SHERIFF RETURN

NOW, April 13, 2006 AT 9:47 AM SERVED THE WITHIN SUMMONS ON RODGER KEPHART TRUCKING INC.
DEFENDANT AT RR#1 BOX 298, HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ANNA
MAE KEPHART, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL SUMMONS AND MADE KNOWN THE
CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 3 of 3 Services

Sheriff Docket # **101417**

LJL TRUCKING, P/A MED-VAN TRANSPORT, INC. al

Case # 06-405-CD

vs.

C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC. and
BARRY QUINN

TYPE OF SERVICE SUMMONS

SHERIFF RETURNS

NOW May 04, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN SUMMONS "NOT FOUND" AS TO BARRY QUINN, DEFENDANT. MOVED, LEFT NO FORWARDING ADDRESS.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101417
NO: 06-405-CD
SERVICES 3
SUMMONS

PLAINTIFF: L JL TRUCKING, P/A MED-VAN TRANSPORT, INC. al

vs.

DEFENDANT: C.W. KRAUSE AND COMPANY, RODGER KEPHART TRUCKING, INC. and
BARRY QUINN

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MCNEIL	9001974	30.00
SHERIFF HAWKINS	MCNEIL	9001974	60.65

Sworn to Before Me This

So Answers,

____ Day of _____ 2006

Chester A. Hawkins
Sgt. Marilyn Harris
Chester A. Hawkins
Sheriff

LJL TRUCKING,
P/A MED-VAN TRANSPORT, INC.,
and MASSACHUSETTS BAY
INSURANCE COMPANY,

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

Plaintiffs

2006-405-CO

v.

C.W. KRAUSE AND COMPANY,
RODGER KEPHART TRUCKING, INC.,
and BARRY QUINN,

: TYPE OF DOCUMENT:
: Praeclipe for Writ of Summons
: for Subrogation Action

Defendants

WRIT OF SUMMONS

TO: BARRY QUINN

You are hereby notified that LJL Trucking, P/A Med-Van Transport, Inc. and Massachusetts Bay Insurance Company have commenced a subrogation action against you which you are required to defend or a default judgment may be entered against you.

Date: MARCH 17, 2006



Prothonotary

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

SEAL:

WILLIAM A. SHAW
Prothonotary
Wyo. Commission on Ethics
1st Monday in July, 2006
Certified Co., Casper, WY

FILED

MAY 04 2006

William A. Shaw
Prothonotary/Clerk of Courts