

06-799-CD

S. Anderson et al vs Clfd-Curwensville Golf

2006-799-CD

Sandra Anderson et al vs Clfd-Civil County

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

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD -
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants

No. 06- 799- CD

Type of Pleading: Complaint

Filed on behalf of: Sandra Anderson and
Joseph P. Anderson, Plaintiffs

Counsel of Record for this party:

HOPKINS HELTZEL LLP

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

FILED Atty Pd. 85.00
05/19/06
MAY 19 2006
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William A. Shaw
Prothonotary/Clerk of Courts

July 11, 2006 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

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

SANDRA ANDERSON	:	
JOSEPH P. ANDERSON	:	
	Plaintiffs	:
	:	
vs.	:	No. 06-
	:	CD
	:	
CLEARFIELD-CURWENSVILLE	:	
COUNTRY CLUB and CLEARFIELD -	:	
CURWENSVILLE GOLF AND COUNTRY	:	
CLUB and JAMES COLLINS,	:	
	Defendants	:

NOTICE

TO DEFENDANTS:

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

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

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 ext. 5982

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

SANDRA ANDERSON	:	
JOSEPH P. ANDERSON	:	
	Plaintiffs	:
	:	
vs.	:	No. 06- CD
	:	
CLEARFIELD-CURWENSVILLE	:	
COUNTRY CLUB and CLEARFIELD -	:	
CURWENSVILLE GOLF AND COUNTRY	:	
CLUB and JAMES COLLINS,	:	
	Defendants	:

COMPLAINT

AND NOW, comes the Plaintiffs, Sandra Anderson and Joseph P. Anderson, by and through their attorneys, Hopkins Heltzel LLP, and says as follows:

1. Plaintiffs, Sandra Anderson and Joseph P. Anderson, are married to each other and reside at 114 West Pauline Drive, Clearfield, Pennsylvania 16830.
2. Defendant, Clearfield-Curwensville Country Club, is a not-for-profit corporation organized under the laws of the Commonwealth of Pennsylvania maintaining a principal business address at 101 North Second Street, Clearfield, Pennsylvania 16830. The entity is also known as the Clearfield-Curwensville Golf and Country Club. Throughout this Complaint, these Defendants shall hereinafter be known as "Golf Course."
3. Defendant, James Collins, is an adult individual whose address is 2208 George Road, Clearfield, Pennsylvania 16830.
4. On or about June 22, 2004, Plaintiff was a business invitee at Defendant Golf Course playing in the annual 2004 women's member guest tournament as a guest.

5. At or about 12:00 noon, Plaintiff and her teammate were driving in a golf cart supplied by Defendant Golf Course and stopped for food in an area designated for golfers to stop or generally recognized and provided for golfers to stop when picking up food as they were "making the turn."

6. Rain was drizzling on the date and time set forth above.

7. Plaintiff departed the golf cart and stepped onto a concrete patio leading to the restaurant area of Defendant Golf Course.

8. The concrete was wet, smooth, polished or sealed, and Plaintiff immediately slipped on said surface, falling and fracturing her tibia and fibula.

9. The concrete had been poured, finished, polished or sealed by Defendant James Collins several months before Plaintiff's fall.

COUNT I

10. Plaintiffs incorporate and repeat the allegations set forth in paragraphs 1 through 9 as if set forth at length herein.

11. Defendant Golf Course acted carelessly, negligently and without regard to the public in general and Plaintiff Sandra Anderson in particular, both as a member of the public and as an invited guest, in one or more of the following ways:

A. Causing a concrete floor to be poured and finished so that its surface was smooth;

B. Causing a concrete floor to be poured and finished in such a manner that the floor would become slippery when wet;

- C. Causing a concrete floor to be finished or sealed in such a manner that it would become slippery when wet;
- D. Failing to provide anti-skid material or taking other prophylactic measures on the concrete floor at a time when Defendant Golf Course knew the floor was wet and slippery;
- E. Failing to close the patio when Defendant Golf Course knew or should have known the concrete floor was wet and slippery;
- F. Failing to provide a reasonable alternate entrance into the restaurant area for golfers when defendant Golf Course knew or should have known the concrete floor was wet and slippery;
- G. Failing to provide handrails or other safety features along the entranceway from the Golf Course to the restaurant area;
- H. Failing to provide a safe means of ingress and egress from the Golf Course to the bar and restaurant area for golfers;
- I. Failing to construct the concrete floor in a safe fashion knowing that golfers with "soft spikes" would be using the floor;
- J. Failing to construct the concrete floor pursuant to the laws and codes of the Commonwealth of Pennsylvania, County of Clearfield and Township of Hyde;
- K. Failing to cover the patio from the elements;
- L. Failing to warn golfers that the patio floor was slippery;
- M. Failing to warn golfers that the patio floor became slippery when wet.

12. As a direct, proximate, natural, foreseeable and probable consequence of Defendant's negligence, carelessness and reckless conduct, Plaintiff, Sandra Anderson, was

placed in immediate peril and suffered severe injuries consisting of a fractured tibia and fibula and other injuries which may yet develop.

13. As a direct result of the Defendant's negligence, carelessness and reckless conduct, Plaintiff has suffered, and will suffer in the future, great pain agony and inconvenience.

14. As a direct and proximate result of the Defendant's negligence, carelessness and reckless conduct, Plaintiff has incurred, and will in the future incur expenses for medical treatment in an amount not yet ascertained.

15. As a direct and proximate result of the Defendant's negligence and reckless conduct, Plaintiff was prevented from attending to her usual duties of employment, causing loss of income and in the future incurred earning losses by not being able to achieve her full employment potential.

16. As a direct and proximate result of Defendant's negligence, careless and reckless conduct, Plaintiff has suffered and will continue to suffer loss in the quality of her life.

17. Defendant is liable for Plaintiff Sandra Anderson's injuries described herein, inasmuch as Plaintiff injuries are the direct, proximate, natural, foreseeable and probable consequences of Defendant's negligence, carelessness and recklessness as set forth herein.

WHEREFORE, Plaintiff, Sandra Anderson, demands judgment be entered in her favor against Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, jointly and severally, in an amount in excess of \$25,000.00, together with interest, cost of suit damages for delay and such other relief as the Court deems just and appropriate.

COUNT II

18. Plaintiffs incorporate and repeat paragraphs 1 through 17 of this Complaint as if each were set forth within.

19. Defendant, James Collins, acted carelessly, negligently and without regard to the public in general and Plaintiff Sandra Anderson in particular in one or more of the following ways:

- A. Constructing a concrete floor in a manner that its surface was smooth and would become slippery when wet;
- B. Constructing a concrete floor to be poured and finished in such a manner that the floor would become slippery when wet;
- C. Finishing or sealing a concrete floor in such a manner that it would become slippery when wet;
- D. Failing to provide anti-skid material or taking other prophylactic measures on the concrete floor at a time when defendant knew the floor would become wet and slippery;
- E. Constructing a concrete floor without handrails or other safety features along the entranceway from the Golf Course to the restaurant area;
- H. Failing to provide a safe means of ingress and egress across the concrete floor;
- I. Failing to construct the concrete floor in a safe fashion knowing that golfers with "soft spikes" would be using the floor;
- N. Failing to construct the concrete floor pursuant to the laws and codes of the Commonwealth of Pennsylvania, County of Clearfield and Township of Hyde;

- O. Failing to cover the patio from the elements;
- P. Failing to warn golfers that the patio floor was slippery;
- Q. Failing to warn golfers that the patio floor became slippery when wet.

20. As a direct, proximate, natural, foreseeable and probable consequence of Defendant's negligence, carelessness and reckless conduct, Plaintiff Sandra Anderson was placed in immediate peril and suffered severe injuries consisting of a fractured tibia and fibula and other injuries which may yet develop.

21. As a direct result of the Defendant's negligence, carelessness and reckless conduct, Plaintiff has suffered, and will suffer in the future, great pain agony and inconvenience.

22. As a direct and proximate result of the Defendant's negligence, carelessness and reckless conduct, Plaintiff has incurred, and will in the future incur expenses for medical treatment in an amount not yet ascertained.

23. As a direct and proximate result of the Defendant's negligence and reckless conduct, Plaintiff was prevented from attending to her usual duties of employment, causing loss of income and in the future incurred earning losses by not being able to achieve her full employment potential.

24. As a direct and proximate result of Defendant's negligence, careless and reckless conduct, Plaintiff has suffered and will continue to suffer loss in the quality of her life.

25. Defendant is liable for Plaintiff Sandra Anderson's injuries described herein, inasmuch as Plaintiff injuries are the direct, proximate, natural, foreseeable and probable consequences of Defendant James Collins' negligence, carelessness and recklessness as set forth herein.

WHEREFORE, Plaintiff, Sandra Anderson, demands judgment be entered in her favor against Defendant, James Collins, in an amount in excess of \$25,000.00, together with interest,

cost of suit damages for delay and such other relief as the Court deems just and appropriate.

COUNT III

26. Plaintiffs incorporate and repeat paragraphs 1 through 25 of this Complaint as if each were set forth within.

27. As a result of Defendants, James Collins, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, Plaintiff Joseph P. Anderson has been deprived of the society, companionship, contributions, and consortium of his wife Sandra Anderson, to his great detriment and loss.

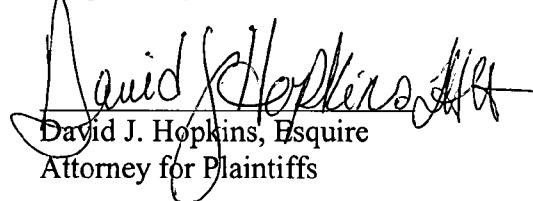
28. As a result of Defendants, James Collins, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, Plaintiff Joseph P. Anderson, has suffered a disruption in his daily habits and pursuits and a loss of enjoyment of life.

WHEREFORE, Plaintiff, Joseph P. Anderson, respectfully demands judgment against Defendants, Clearfield-Curwensville Country Club, Clearfield-Curwensville Golf and Country Club and James Collins, jointly and severally, in an amount in excess of \$25,000.00, together with interest, cost of suit damages for delay and such other relief as the Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by twelve jurors on all issues presented herein.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiffs

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of
18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the
statements made in this pleading are true and correct.

Sandra B. Anderson
Sandra Anderson

Joseph P. Anderson
Joseph P. Anderson

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

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs

vs.

No. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD -
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants

Type of Pleading: Praeclipe to Reinstate
Complaint

Filed on behalf of: Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

FILED NO CC
012106 Atty pd. 7.00
JUL 11 2006
1 Compl. Reinstate
William A. Shaw to Atty
Prothonotary/Clerk of Courts
3 Compl. Reinstate
to Staff
(GK)

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

SANDRA ANDERSON :
JOSEPH P. ANDERSON :
Plaintiffs :
vs. : No. 2006-799 CD
CLEARFIELD-CURWENSVILLE :
COUNTRY CLUB and CLEARFIELD - :
CURWENSVILLE GOLF AND COUNTRY :
CLUB and JAMES COLLINS, :
Defendants :
:

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint filed in the above captioned matter.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101704
NO: 06-799-CD
SERVICE # 1 OF 3
COMPLAINT

PLAINTIFF: SANDRA ANDERSON and JOSEPH P. ANDERSON

vs.

DEFENDANT: CLEARFIELD-CURWENSVILLE COUNTRY CLUB and CLEARFIELD-CURWENSVILLE
GOLD AND COUNTRY CLUB and JAMES COLLINS

SHERIFF RETURN

NOW, July 17, 2006 AT 11:45 AM SERVED THE WITHIN COMPLAINT ON CLEARFIELD-CURWENSVILLE
COUNTRY CLUB DEFENDANT AT 1125 COUNTRY CLUB ROAD, CLEARFIELD, CLEARFIELD COUNTY,
PENNSYLVANIA, BY HANDING TO SCOTT MORGAN, CLUB MANAGER A TRUE AND ATTESTED COPY OF THE
ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

FILED
07/21/06
JUL 21 2006
WAS

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101704
NO: 06-799-CD
SERVICE # 2 OF 3
COMPLAINT

PLAINTIFF: SANDRA ANDERSON and JOSEPH P. ANDERSON

VS.

DEFENDANT: CLEARFIELD-CURWENSVILLE COUNTRY CLUB and CLEARFIELD-CURWENSVILLE
GOLD AND COUNTRY CLUB and JAMES COLLINS

SHERIFF RETURN

NOW, July 17, 2006 AT 11:45 AM SERVED THE WITHIN COMPLAINT ON CLEARFIELD-CURWENSVILLE GOLD AND COUNTRY CLUB DEFENDANT AT 112 COUNTRY CLUB ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SCOTT MORGAN, CLUB MANAGER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101704
NO: 06-799-CD
SERVICE # 3 OF 3
COMPLAINT

PLAINTIFF: SANDRA ANDERSON and JOSEPH P. ANDERSON

vs.

DEFENDANT: CLEARFIELD-CURWENSVILLE COUNTRY CLUB and CLEARFIELD-CURWENSVILLE
GOLD AND COUNTRY CLUB and JAMES COLLINS

SHERIFF RETURN

NOW, July 18, 2006 AT 11:34 AM SERVED THE WITHIN COMPLAINT ON JAMES COLLINS DEFENDANT AT 2208 GEORGE ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SHERI COLLINS, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101704
NO: 06-799-CD
SERVICES 3
COMPLAINT

PLAINTIFF: SANDRA ANDERSON and JOSEPH P. ANDERSON

vs.

DEFENDANT: CLEARFIELD-CURWENSVILLE COUNTRY CLUB and CLEARFIELD-CURWENSVILLE
GOLD AND COUNTRY CLUB and JAMES COLLINS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	HOPKINS	16568	30.00
SHERIFF HAWKINS	HOPKINS	16568	34.39

Sworn to Before Me This

So Answers,

____ Day of _____ 2006


Chester A. Hawkins
Sheriff

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

CIVIL ACTION - LAW

Number 799 - 2006 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Defendant,
James Collins

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M 11:10 AM NOCC
JUL 26 2008
JM

William A. Shaw
Prothonotary/Clerk of Courts

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

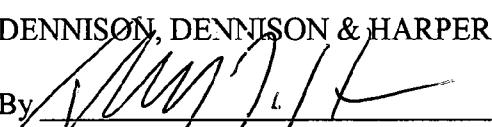
Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
*
*
*
*
*
* Number 799 - 2006 C.D.

APPEARANCE

TO WILLIAM SHAW, CLEARFIELD COUNTY PROTHONOTARY:

Enter our Appearance on behalf of the Defendant, JAMES COLLINS, in regard to the
above-captioned matter.

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant,
James Collins

Dated: July 24, 2006

CERTIFICATE OF SERVICE

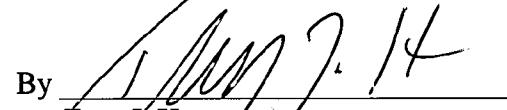
I certify that a true and correct copy of the foregoing Appearance was served on the 25th day of July, 2006, by United States Mail, First Class, Postage Prepaid, addressed to the following:

David J. Hopkins, Esquire
HOPKINS HELTZEL LLP
100 Meadow Lane, Suite 5
DuBois, PA 15801

Clearfield-Curwensville Country Club
Clearfield-Curwensville Golf and Country Club
101 North Second Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
James Collins

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

CIVIL ACTION - LAW

Number 799 - 2006 C.D.

Type of Case: Civil Division

Type of Pleading: Answer, New Matter and
New Matter Pursuant to Pa.R.C.P. 2252(d)

Filed on behalf of: Defendant,
James Collins

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
M 11:05 AM
AUG 10 2006
GK

William A. Shaw
Prothonotary/Clerk of Courts

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
*
*
*
* Number 799 - 2006 C.D.

NOTICE TO PLEAD

TO: PLAINTIFFS:

You are hereby notified to plead to the enclosed New Matter within twenty (20) days from service hereof or a default judgment may be entered against you.

TO: CLEARFIELD-CURWENSVILLE COUNTRY CLUB and CLEARFIELD- CURWENSVILLE GOLF AND COUNTRY CLUB

You are hereby notified to plead to the enclosed New Matter within twenty (20) days from service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for the Defendant,
James Collins

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
*
*
*
*
* Number 799 - 2006 C.D.

ANSWER, NEW MATTER AND NEW MATTER PURSUANT TO PA.R.C.P. 22529(d)

AND NOW, comes the Defendant, JAMES COLLINS, by and through his attorneys, Dennison, Dennison & Harper, who file the following Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d):

1. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 1 of the Plaintiffs' Complaint, and said averments are therefore denied.
2. Admitted.
3. Admitted.
4. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 4 of the Plaintiffs' Complaint, and said averments are therefore denied.

5. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 5 of the Plaintiffs' Complaint, and said averments are therefore denied.

6. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 6 of the Plaintiffs' Complaint, and said averments are therefore denied.

7. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 7 of the Plaintiffs' Complaint, and said averments are therefore denied.

8. After reasonable investigation, the Defendant, James Collins, is without sufficient knowledge or information to form a belief as to the averments of Paragraph 8 of the Plaintiffs' Complaint, and said averments are therefore denied.

9. The averments of Paragraph 9 of the Plaintiffs' Complaint are admitted only insofar as the Defendant, James Collins, poured a concrete patio at the Defendant, Clearfield-Curwensville County Club/Clearfield -Curwensville Golf and Country Club, golf course in or around April and or May of 2004. The remaining averments of Paragraph 9 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e).

COUNT I

10. Paragraph 10 of the Plaintiffs' Complaint is merely an incorporation clause and contains no specific averments; therefore, no response is deemed required. To the extent any response is deemed required, the Defendant, James Collins, hereby incorporates Paragraphs 1

through 9 of this Answer in response thereto.

11. through 17. The averments of Paragraphs 11 through 17 of the Plaintiffs' Complaint including all of their subparagraphs are directed to a party other than the answering Defendant, James Collins. As such, no response is deemed required by the answering Defendant, James Collins. To the extent any further response would be deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e).

WHEREFORE, the Defendant, James Collins, demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

COUNT II

18. Paragraph 18 of the Plaintiffs' Complaint is merely an incorporation clause and contains no specific averments, therefore, no response is deemed required. To the extent any response is deemed required, the Defendant, James Collins, hereby incorporates Paragraphs 1 through 17 of this Answer in response thereto.

19. The averments of Paragraph 19 of the Plaintiffs' Complaint and subparagraphs A. through Q. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

20. The averments of Paragraph 20 of the Plaintiffs' Complaint alleging any negligence, carelessness or recklessness by the Defendant, James Collins, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 20 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

21. The averments of Paragraph 21 of the Plaintiffs' Complaint alleging any negligence, carelessness or recklessness by the Defendant, James Collins, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 21 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

22. The averments of Paragraph 22 of the Plaintiffs' Complaint alleging any negligence, carelessness or recklessness by the Defendant, James Collins, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 22 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

23. The averments of Paragraph 23 of the Plaintiffs' Complaint alleging any negligence, carelessness or recklessness by the Defendant, James Collins, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 23 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

24. The averments of Paragraph 24 of the Plaintiffs' Complaint alleging any negligence, carelessness or recklessness by the Defendant, James Collins, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of

Paragraph 24 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

25. The averments of Paragraph 25 of the Plaintiffs' Complaint constitute conclusions of law to which no response is deemed required. To the extent any additional response would be deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e).

WHEREFORE, the Defendant, James Collins, demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

COUNT III

26. Paragraph 26 of the Plaintiffs' Complaint is merely an incorporation clause and contains no specific averments, therefore, no response is deemed required. To the extent any response is deemed required, the Defendant, James Collins, hereby incorporates Paragraphs 1 through 26 of this Answer in response thereto.

27. To the extent the averments of Paragraph 27 of the Plaintiffs' Complaint are directed to Defendant, James Collins, and allege any negligence, carelessness or recklessness by the Defendant, James Collins, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 27 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied. To the extent any of the averments of Paragraph 27 are directed

to a party other than the answering Defendant, James Collins, no response is required by this answering Defendant.

28. To the extent the averments of Paragraph 28 of the Plaintiffs' Complaint are directed to Defendant, James Collins, and allege any negligence, carelessness or recklessness by the Defendant, James Collins, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 28 of the Plaintiffs' Complaint, after reasonable investigation, the Defendant, James Collins, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied. To the extent any of the averments of Paragraph 28 are directed to a party other than the answering Defendant, James Collins, no response is required by this answering Defendant.

WHEREFORE, the Defendant, James Collins, demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

NEW MATTER

29. The alleged injuries and/or damages sustained by the Plaintiffs, without admission of the same, were caused or contributed to, in whole or in part, by persons or entities other than the Defendant, James Collins, and over whom the Defendant, James Collins, had no control, and for whose actions the Defendant, James Collins, is not liable.

30. All of the Plaintiffs' claims are barred by the applicable statute of limitations.

31. The Plaintiffs have failed to state a claim against the Defendant, James Collins, upon which relief can be granted.

WHEREFORE, the Defendant, James Collins, demands judgment in his favor and against the Plaintiffs. **JURY TRIAL DEMANDED.**

**NEW MATTER PURSUANT TO P.A.R.C.P. 2252(d) DIRECTED TO
THE DEFENDANT, CLEARFIELD-CURWENSVILLE COUNTRY CLUB AND
CLEARFIELD-CURWENSVILLE GOLF AND COUNTRY CLUB**

32. At all times material hereto, the Defendant, James Collins, poured the concrete for the patio described in the Plaintiffs' Complaint as requested and directed by representatives, employees or agents of the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, without any compensation.

33. At all times material hereto, the Defendant, James Collins, was specifically requested and instructed by representatives, employees or agents of the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, to put a smooth finish on the poured concrete.

34. The Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, is solely liable to the Plaintiffs for any alleged damages suffered by them, without admission of the same, and the averments of Paragraphs 32 and 33 of this New Matter and the averments of the Plaintiffs' Complaint directed against the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, without admitting or adopting the truth of the same, are incorporated herein by reference thereto solely for the purpose of establishing a claim for sole liability.

35. If the Defendant, James Collins, is held liable to the Plaintiffs on any cause of action as set forth in the Plaintiffs' Complaint, such liability being expressly denied, then the Defendant,

Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, is liable over to the Defendant, James Collins, for contribution and/or indemnity, and the averments of Paragraphs 32 and 33 of this New Matter and the averments of the Plaintiffs' Complaint directed against the Defendant, Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, without admitting or adopting the truth of the same, are incorporated herein by reference thereto solely for the purpose of establishing a claim against the Defendant, Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, for indemnity and contribution.

WHEREFORE, the Defendant, James Collins, joins the Defendant, Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, as an Additional Defendant and demands judgment against it as being solely liable for the damages claimed by the Plaintiffs, or in the alternative, as being liable over to the Defendant, James Collins, for indemnity and/or contribution. **JURY TRIAL DEMANDED.**

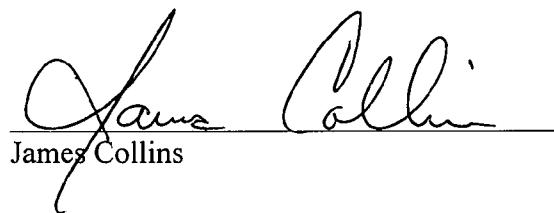
DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant,
James Collins

VERIFICATION

I verify that the averments made in the forgoing Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d) are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.



James Collins

A handwritten signature in black ink, appearing to read "James Collins". The signature is fluid and cursive, with "James" on the left and "Collins" on the right, connected by a line. Below the signature, the name "James Collins" is printed in a smaller, more formal font.

CERTIFICATE OF SERVICE

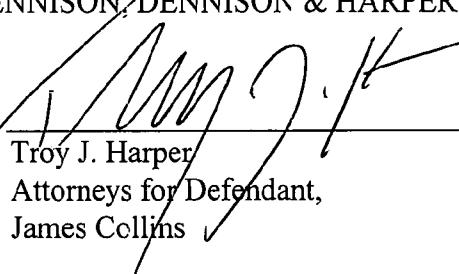
I certify that a true and correct copy of the foregoing Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 2252(d) were served on the 9th day of August, 2006, by United States Mail, First Class, Postage Prepaid, addressed to the following:

David J. Hopkins, Esquire
HOPKINS HELTZEL LLP
100 Meadow Lane, Suite 5
DuBois, PA 15801

Clearfield-Curwensville Country Club
Clearfield-Curwensville Golf and Country Club
101 North Second Street
Clearfield, PA 16830

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
James Collins

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLD AND
COUNTRY CLUB and JAMES COLLINS

PRAECIPE FOR APPEARANCE
JURY TRIAL DEMANDED

Defendants

Filed on behalf of the Defendant,
Clearfield-Curwensville Gold and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED ^{NO CC}
M 12:30 PM
AUG 17 2001

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
vs.
NO. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLD AND
COUNTRY CLUB and JAMES COLLINS

Defendants

PRAECIPE FOR APPEARANCE

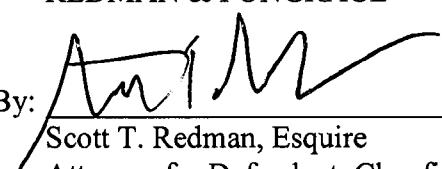
TO: PROTHONOTARY OF SAID COURT:

Kindly enter my appearance on behalf of the defendant, CLEARFIELD-
CURWENSVILLE GOLD AND COUNTRY CLUB, in the above-captioned
matter.

Respectfully submitted,

REDMAN & PONGRACE

By:



Scott T. Redman, Esquire
Attorney for Defendant, Clearfield-
Curwensville Gold and Country Club

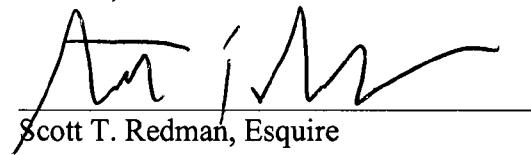
JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the
within PRAECIPE FOR APPEARANCE was served this 15th day of August, 2006 via
United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

James Collins
2208 George Road
Clearfield, PA 16830
(Co-Defendant)



Scott T. Redman, Esquire

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

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs

vs.

No. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD -
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants

Type of Pleading: Plaintiffs' Answer to
New Matter Pursuant to Pa.R.C.P. 2252(d)

Filed on behalf of Sandra Anderson
and Joseph P. Anderson, Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

August 25, 2006

FILED

Em
AUG 28 2006

8/28/06

William A. Shaw
Prothonotary/Clerk of Courts

no C/C

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

SANDRA ANDERSON	:
JOSEPH P. ANDERSON	:
Plaintiffs	:
vs.	No. 2006-799 CD
CLEARFIELD-CURWENSVILLE	:
COUNTRY CLUB and CLEARFIELD -	:
CURWENSVILLE GOLF AND COUNTRY	:
CLUB and JAMES COLLINS,	:
Defendants	:

PLAINTIFFS' ANSWER TO NEW MATTER
PURSUANT TO PA.R.C.P. 22529(d)

AND NOW, comes the Plaintiffs, by and through their attorneys, Hopkins Heltzel LLP, and answers Defendant James Collins' New Matter Pursuant to Pa.R.C.P. 22529(d) as follows:

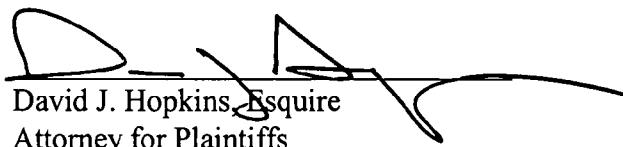
29. Denied. James Collins is liable, jointly and severally with other Defendants in this litigation for creating a hazard as set forth in Plaintiffs' Complaint.

30. Denied. Plaintiffs commenced this lawsuit within two (2) years of Plaintiff's fall.

31. Denied. Plaintiffs have plead a legally viable cause of action.

WHEREFORE, Defendant James Collins' New Matter should be dismissed with prejudice.

Respectfully submitted,



David J. Hopkins, Esquire
Attorney for Plaintiffs

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

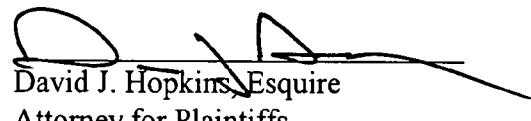
SANDRA ANDERSON :
JOSEPH P. ANDERSON :
Plaintiffs :
vs. : No. 2006-799 CD
CLEARFIELD-CURWENSVILLE :
COUNTRY CLUB and CLEARFIELD - :
CURWENSVILLE GOLF AND COUNTRY :
CLUB and JAMES COLLINS, :
Defendants :
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of Plaintiffs' Answer to Defendant James Collins' New Matter, filed on behalf of Sandra Anderson and Joseph P. Anderson, was forwarded by first class mail, postage prepaid, on the 15th day of August, 2006, to counsel of record, addressed as follows:

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825

Scott T. Redman, Esquire
610 Two Chathman Center
Pittsburgh, PA 15236


David J. Hopkins, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

**REPLY TO NEW MATTER
PURSUANT TO PA R.C.P. (2252d)
JURY TRIAL DEMANDED**

Defendants

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield-Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED

SEP 29 2006

M/12/06/06

William A. Shaw
Prothonotary/Clerk of Courts

No C/C 60

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
vs.
NO. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

REPLY TO NEW MATTER PURSUANT TO PA R.C.P. 2252(d)

AND NOW, comes the defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, by and through its attorney, Scott T. Redman, Esquire, and files the within Reply to New Matter Pursuant to Pa. R.C.P. 2252(d), averring as follows:

1. The allegations of Paragraph 32 of the New Matter are admitted insofar as the defendant, James Collins, was not compensated for his work however, defendant Collins was still required to perform his work in a reasonable and workmanlike manner so that the surface would be safe for persons walking on same.

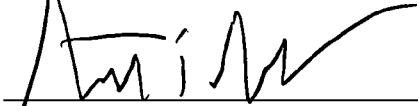
2. The allegations of Paragraph 33 of the Complaint are admitted to the extent that the defendant was requested to put a smooth finish on the concrete floor in question however, defendant Collins was expected to perform his work in a reasonable and workmanlike manner so that the concrete floor would be safe for persons using same.

3. The allegations of Paragraphs 34 and 35 of the Complaint constitute a conclusion of law to which no response is required. To the extent a response is required, defendants, Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, hereby incorporate by reference their Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d) as if more fully set forth at length herein.

WHEREFORE, defendants, Clearfield-Curvewsille Country Club and Clearfield-Curvewsille Golf and Country Club, deny any and all liability to plaintiffs and the co-defendant, James Collins, and demand judgment in their favor with prejudice together with the cost of this action and any and all other relief as pled in their Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d).

Respectfully submitted,

REDMAN & PONGRACE

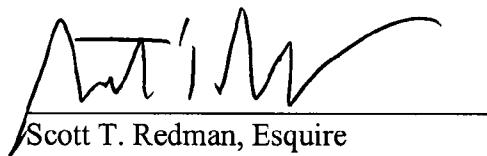
By: 

Scott T. Redman, Esquire
Attorney for Defendant, Clearfield-
Curwensville Country Club and Clearfield-
Curwensville Golf and Country Club

JURY TRIAL DEMANDED

VERIFICATION

I, Scott T. Redman, Esquire, do hereby state that I am the attorney for the defendant in this action, that the verification of my client cannot be obtained within the time frame allowed for the filing of the within document, and that the facts contained in the foregoing Reply to New MatterNew Matter Pursuant to PA R.C.P. 2252(d) are based upon information provided by the defendant, and are true and correct to the best of my information and belief. I understand that any false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



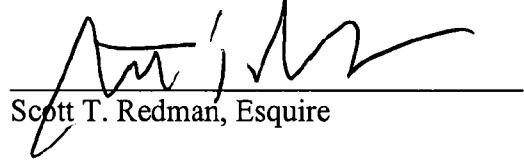
Scott T. Redman, Esquire

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the within REPLY TO NEW MATTER PURSUANT TO PA R.C.P. 2252(d) was served this _____ day of September, 2006 via United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

No. 2006-799 CD

**ANSWER, NEW MATTER AND NEW
MATTER PURSUANT TO PA R.C.P.
(2252d)**

JURY TRIAL DEMANDED

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield- Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED

SEP 29 2006

9/12/06
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
vs.
NO. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

ANSWER

AND NOW, comes the defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, by and through its attorney, Scott T. Redman, Esquire, and files the within Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d), averring as follows:

1. After reasonable investigation, the defendants are without knowledge or information sufficient to form a belief as to the truth of said averments thus said allegations are denied and strict proof is demanded at trial.
2. The allegations of Paragraph 2 of the Complaint are admitted.
3. After reasonable investigation, defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 3 of the Complaint thus said allegations are denied and strict proof is demanded at trial.

4. The allegations of Paragraph 4 of the Complaint constitute a conclusion of law to which extent no response is required. It is admitted however that the plaintiff was on the premises to play in a golf tournament on the date of the alleged injury.

5.-8. After reasonable investigation, defendant is without knowledge or information sufficient to form a belief as to the truth of said averments thus said allegations are denied and strict proof is demanded.

9. The allegations of Paragraph 9 of the Complaint are admitted to the extent that the defendant, James Collins, had performed work for the defendant Country Club on a date prior to the alleged fall however, it is specifically denied that any work performed by Mr. Collins created any dangerous condition an that otherwise the work was performed in a reasonable and workmanlike manner.

COUNT I

10. To the extent that Paragraph 10 incorporates by reference Paragraphs 1 through 9 of the Complaint, defendants hereby incorporate by reference their responses to Paragraphs 1 through 9 of the Complaint as if more fully set forth at length herein.

11. The allegations of Paragraph 11 of the Complaint are denied pursuant to Pa.R.C.P. 1029(e).

12.-16. To the extent that Paragraphs 12 through 16 allege negligence on the part of the defendant Country Club, said allegations are denied pursuant to Pa.R.C.P. 1029(e). With regard to the remaining allegations of Paragraphs 12 through 16 of the Complaint, after reasonable investigation, defendant is without knowledge or information sufficient to form a belief as to the truth of said averments thus said allegations are denied and strict proof is demanded.

17. The allegations of Paragraph 17 of the Complaint are specifically denied. Any liability on the part of the defendant is denied pursuant to Pa.R.C.P. 1029(e).

COUNT II

18. To the extent that Paragraph 18 incorporates by reference Paragraphs 1 through 17 of the Complaint, defendant Country Club hereby incorporates by reference its response to Paragraphs 1 through 17 of the Complaint as if more fully set forth at length herein.

19.-25. The allegations of Paragraphs 19 through 25 of the Complaint are directed to defendant, James Collins, for which no response is required of defendant Country Club.

COUNT III

26. To the extent that Paragraph 26 incorporates by reference Paragraphs 1 through 25 of the Complaint, defendant Country Club hereby incorporates by reference its responses to Paragraphs 1 through 25 of the Complaint as if more fully set forth at length herein.

27.-28. To the extent that Paragraphs 27 and 28 allege negligence on the part of the defendant Country Club, said allegations are denied pursuant to Pa.R.C.P. 1029(e). With regard to the remaining allegations in Paragraphs 27 and 28, after reasonable investigation, defendant is without knowledge or information sufficient to form a belief as to the truth of said averments thus said allegations are denied and strict proof is demanded at trial.

WHEREFORE, defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, deny any and all liability to the plaintiffs and demand judgment in their favor with prejudice together with the cost of this action.

NEW MATTER

By way of further response, defendants submit the following New Matter, averring as follows:

29. Any and all claims are barred by the contributory negligence of the plaintiffs pursuant to the provisions of the Pennsylvania Comparative Negligence Act, 42 Pa.C.S. §7102.

30. Any and all claims are barred by the voluntary assumption of the risk of the plaintiff.

31. Any and all claims are barred by the intervening and/or superseding negligence of third parties known or unknown.

WHEREFORE, defendants deny any and all liability to the plaintiffs and demand judgment in their favor with prejudice together with the cost of this action.

NEW MATTER PURSUANT TO PA R.C.P. 2252(d)

By way of further response, defendants submit the following New Matter cross claims pursuant to Pa. R.C.P. 2252(d), averring as follows:

32. Defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, set forth the following cross claims and contribution indemnity and/or liability over against the co-defendant, James Collins, and further set forth claims that the co-defendant, James Collins, is solely liable to the plaintiffs.

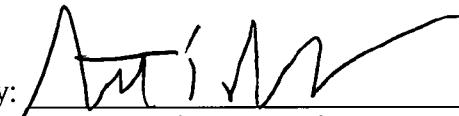
33. Solely for purposes of this cross claim and without admitting same, defendants hereby incorporate by reference the allegations in the plaintiffs' Complaint as if more fully set forth at length herein.

34. To the extent that liability is predicated against the defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, said defendants demand judgment and contribution indemnity and/or liability over against the co-defendant, James Collins, and further demand that the co-defendant, James Collins, be found solely liable in judgment to the plaintiffs.

WHEREFORE, defendants, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, deny any and all liability to the plaintiffs and demand judgment in their favor with prejudice together with the cost of this action. To the extent that liability is predicated against Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club, said defendants demand judgment and contribution indemnity and/or liability over against the co-defendant, James Collins, and further demand that the co-defendant, James Collins, be found solely liable in judgment to the plaintiffs.

Respectfully submitted,

REDMAN & PONGRACE

By: 

Scott T. Redman, Esquire
Attorney for Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club

JURY TRIAL DEMANDED

VERIFICATION

I, Scott T. Redman, Esquire, do hereby state that I am the attorney for the defendant in this action, that the verification of my client cannot be obtained within the time frame allowed for the filing of the within document, and that the facts contained in the foregoing Answer New Matter and New Matter Pursuant to PA R.C.P. 2252(d) are based upon information provided by the defendant, and are true and correct to the best of my information and belief. I understand that any false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



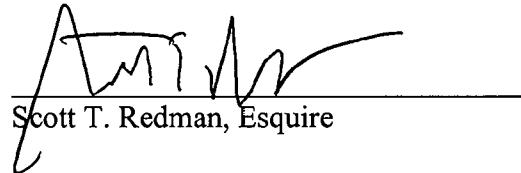
Scott T. Redman, Esquire

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the
within ANSWER, NEW MATTER AND NEW MATTER PURSUANT TO PA R.C.P.
2252(d) was served this 28th day of September, 2006 via United States First Class Mail
upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

CIVIL ACTION - LAW

Number 799 - 2006 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant,
James Collins

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
M 11/17/2006
OCT 04 2006
JM

William A. Shaw
Prothonotary/Clerk of Courts

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
*
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*
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*
* Number 799 - 2006 C.D.

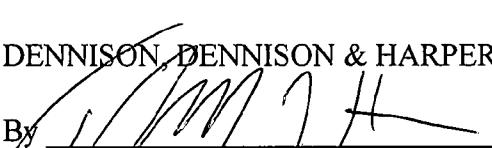
CERTIFICATE OF SERVICE

I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiffs and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiffs were served on the 2nd day of OCTOBER, 2006, by United States Mail, First Class, Postage Prepaid, addressed to:

David J. Hopkins, Esquire
HOPKINS HELTZEL LLP
100 Meadow Lane, Suite 5
DuBois, PA 15801

and one certified copy of the same was served in the same manner addressed to:

Scott Redman, Esq.
870 Six PPG Place
Pittsburgh, Pennsylvania 15222

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant,
James Collins

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

No. 2006-799 CD

**VERIFICATION TO
ANSWER, NEW MATTER AND NEW
MATTER PURSUANT TO PA R.C.P.
(2252d)**

JURY TRIAL DEMANDED

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield- Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED

OCT 05 2006

1/1/06

William A. Shaw

Prothonotary/Clerk of Courts

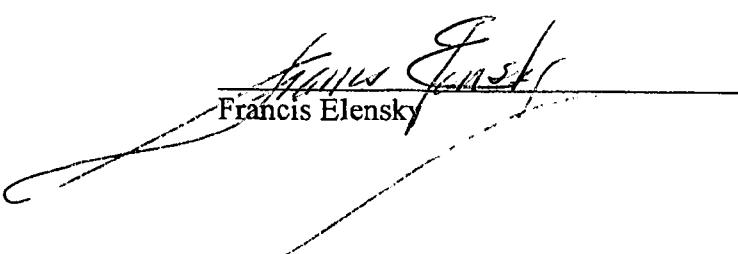
TO ATT
TO ATT

VERIFICATION

I, Francis Elensky, President of the Clearfield-Curwensville Country Club, have read the foregoing Answer, New Matter and New Matter Pursuant to Pa. R.C.P. 2252(d) and verify that the statements contained therein are true to the best of my knowledge, information and belief.

This statement is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 10-02-06


Francis Elensky

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs

No. 2006-799 CD

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

**VERIFICATION TO
REPLY TO NEW MATTER
PURSUANT TO PA R.C.P. (2252d)**
JURY TRIAL DEMANDED

Defendants

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield-Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

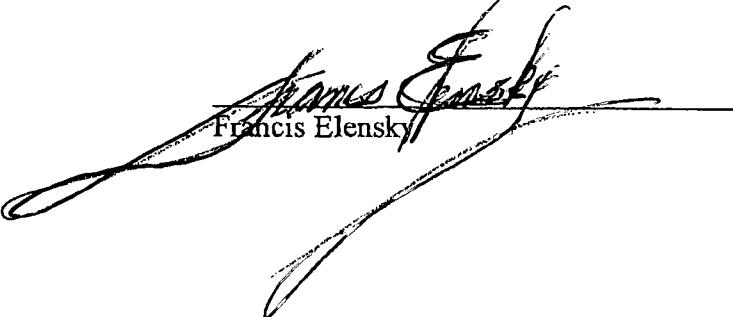
Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED
OCT 05 2006
11:50 AM
William A. Shaw
Prothonotary/Clerk of Court
1 Court St Attn

VERIFICATION

I, Francis Elensky, President of the Clearfield-Curwensville Country Club, have
Reply to
read the foregoing ~~Answer, New Matter and New Matter~~ Pursuant to Pa. R.C.P. 2252(d)
and verify that the statements contained therein are true to the best of my knowledge,
information and belief.

This statement is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to
unsworn falsification to authorities.

Date: 10-02-06
Francis Elensky

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

No. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

**NOTICE OF SERVICE OF
INTERROGATORIES DIRECTED TO
PLAINTIFFS**

JURY TRIAL DEMANDED

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield- Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED NO
MILLION
OCT 13 2006
cc

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
NO. 2006-799 CD
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES

Kindly take Notice that Interrogatories have been served on counsel for Plaintiffs by First Class Mail, postage prepaid, on this 11th day of October, 2006 along with the notice that answers to the same are due within thirty (30) days from the date of service.

Respectfully submitted,



Scott T. Redman, Esquire
Attorney for Defendant

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the within **NOTICE OF SERVICE OF INTERROGATORIES DIRECTED TO PLAINTIFF** was served this 11th day of OCTOBER, 2006, via United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

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

SANDRA ANDERSON :
JOSEPH P. ANDERSON :
Plaintiffs :
vs. : No. 2006-799 CD
CLEARFIELD-CURWENSVILLE :
COUNTRY CLUB and CLEARFIELD - :
CURWENSVILLE GOLF AND COUNTRY :
CLUB and JAMES COLLINS, :
Defendants :
: Type of Pleading: Plaintiffs' Answer to
: New Matter
: Filed on behalf of Sandra Anderson
: and Joseph P. Anderson, Plaintiffs
: Counsel of Record for this party:
: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519
: 100 Meadow Lane, Suite 5
: DuBois, Pennsylvania 15801
: (814) 375-0300

October 18, 2006

FILED NOCC
m 11:01 AM
OCT 19 2006 JS

William A. Shaw
Prothonotary/Clerk of Courts

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

SANDRA ANDERSON :
JOSEPH P. ANDERSON :
Plaintiffs :
vs. : No. 2006-799 CD
CLEARFIELD-CURWENSVILLE :
COUNTRY CLUB and CLEARFIELD - :
CURWENSVILLE GOLF AND COUNTRY :
CLUB and JAMES COLLINS, :
Defendants :

PLAINTIFFS' ANSWER TO NEW MATTER

AND NOW, comes the Plaintiffs, by and through their attorneys, Hopkins Heltzel LLP, and answers Defendant Clearfield-Curwensville Golf and Country Club and Clearfield-Curwensville Golf and Country Club's New Matter as follows:

29. Denied. Plaintiff undertook no act that would bar her claims under the theory of contributory negligence nor pursuant to the Pennsylvania Comparative Negligence Act.

30. Denied. Plaintiff did not voluntarily assume the risk of being injured. At all material times, Plaintiff was an invitee or had other permission to be on the premises.

31. Denied. There were no intervening and/or superseding negligence of known or unknown third parties.

WHEREFORE, Clearfield Curwensville Golf and Country Club's New Matter should be dismissed with prejudice.

Respectfully submitted,



David J. Hopkins, Esquire
Attorney for Plaintiffs

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

SANDRA ANDERSON	:	
JOSEPH P. ANDERSON	:	
	Plaintiffs	:
		:
vs.	:	No. 2006-799 CD
	:	
CLEARFIELD-CURWENSVILLE	:	
COUNTRY CLUB and CLEARFIELD -	:	
CURWENSVILLE GOLF AND COUNTRY	:	
CLUB and JAMES COLLINS,	:	
	Defendants	:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of Plaintiffs' Answer to Defendant Clearfield-Curwensville Country Club and Clearfield-Curwensville Gold and Country Club's New Matter, filed on behalf of Sandra Anderson and Joseph P. Anderson, was forwarded by first class mail, postage prepaid, on the 18th day of October, 2006, to counsel of record, addressed as follows:

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825

Scott T. Redman, Esquire
610 Two Chathman Center
Pittsburgh, PA 15236



David J. Hopkins, Esquire
Attorney for Plaintiffs

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

CIVIL ACTION - LAW

Number 799 - 2006 C.D.

Type of Case: Civil Division

Type of Pleading: Reply to New Matter
Pursuant to Pa.R.C.P. 2252(d)

Filed on behalf of: Defendant,
James Collins

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

OCT 24 2006

M/2:00/m
William A. Shaw
Prothonotary/Clerk of Courts
No 4/C

SANDRA ANDERSON	*	In the Court of Common Pleas of
JOSEPH P. ANDERSON,	*	Clearfield County, Pennsylvania
	*	
Plaintiffs,	*	Civil Division
vs.	*	
	*	
CLEARFIELD-CURWENSVILLE	*	
COUNTRY CLUB and CLEARFIELD-	*	
CURWENSVILLE GOLF AND COUNTRY	*	
CLUB and JAMES COLLINS,	*	
	*	
Defendants.	*	Number 799 - 2006 C.D.

REPLY TO NEW MATTER PURSUANT TO PA.R.C.P. 22529(d)

AND NOW, comes the Defendant, JAMES COLLINS, by and through his attorneys, Dennison, Dennison & Harper, who file the following Reply to Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club's, New Matter Pursuant to Pa.R.C.P. 2252(d):

32. The averments of Paragraph 32 of the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club's, New Matter Pursuant to Pa.R.C.P. 2252(d) constitute conclusions of law, and no further response is deemed required. To the extent any further response would be deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e).

33. Paragraph 33 of the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club's, New Matter Pursuant to Pa.R.C.P. 2252(d) is merely an incorporation clause and contains no specific averments and, therefore, no response is

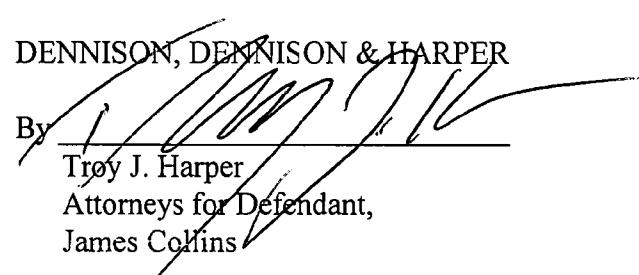
deemed required. To the extent any response is deemed required, the Defendant, James Collins, hereby incorporates the averments of his Answer, New Matter and New Matter Pursuant to Pa.R.C.P. 1029(e) filed in response to the Plaintiffs' Complaint in response thereto.

34. The averments of Paragraph 34 of the Defendant, Clearfield-Curwensville Country Club and Clearfield-Curwensville Golf and Country Club's, New Matter Pursuant to Pa.R.C.P. 2252(d) constitute conclusions of law, and no further response is deemed required. To the extent any further response would be deemed required, said averments are denied pursuant to Pa.R.C.P. 1029(e).

WHEREFORE, the Defendant, James Collins, demands judgment in his favor and against all other parties. **JURY TRIAL DEMANDED.**

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant,
James Collins

VERIFICATION

I verify that the averments made in the foregoing Reply to New Matter are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.



James Collins

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Reply to New Matter Pursuant to Pa.R.C.P. 2252(d) was served on the 23rd day of October, 2006, by United States Mail, First Class, Postage Prepaid, addressed to the following:

David J. Hopkins, Esquire
HOPKINS HELTZEL LLP
100 Meadow Lane, Suite 5
DuBois, PA 15801

Scott T. Redman, Esq.
Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, Pennsylvania 15219

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant,
James Collins

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

**NOTICE OF DEPOSITION OF
SANDRA ANDERSON**
JURY TRIAL DEMANDED

Defendants

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield-Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED

FEB 20 2007
1/15/07
William A. Shaw
Prothonotary/Clerk of Courts
No C/C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
NO. 2006-799 CD

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

NOTICE OF DEPOSITION OF SANDRA ANDERSON

TO: Sandra Anderson
c/o David J. Hopkins, Esquire
Hopkins Helzel
100 Meadow Lane, Suite 4
DuBois, PA 15801

NOTICE is hereby given that the deposition of Sandra Anderson has been scheduled for Wednesday, March 28, 2007, at 10:00 a.m. at the law offices of HOPKINS HELZEL, 100 Meadow Lane, Suite 5, DuBois, PA 15801. This deposition will be taken pursuant to Pa.R.C.P. Nos. 4002 and 4007.1, and other relevant rules respecting discovery.



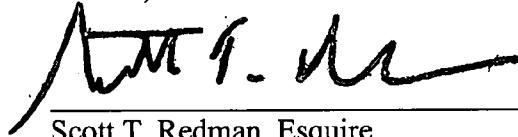
Scott T. Redman, Esquire
610 Two Chatham Center
Pittsburgh, PA 15219
Telephone: (412) 804-3355

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the within NOTICE OF DEPOSITION OF SANDRA ANDERSON was served this 15th day of February, 2007 via United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

**NOTICE OF DEPOSITION OF
JOSEPH ANDERSON**
JURY TRIAL DEMANDED

Defendants

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield-Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED

FEB 20 2007

1:50 /w

William A. Shaw

Prothonotary/Clerk of Courts

No C/L (GK)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
NO. 2006-799 CD

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

NOTICE OF DEPOSITION OF JOSEPH ANDERSON

TO: Joseph Anderson
c/o David J. Hopkins, Esquire
Hopkins Helzel
100 Meadow Lane, Suite 4
DuBois, PA 15801

NOTICE is hereby given that the deposition of Joseph Anderson has been scheduled for Wednesday, March 28, 2007, at 10:00 a.m. at the law offices of HOPKINS HELZEL, 100 Meadow Lane, Suite 5, DuBois, PA 15801. This deposition will be taken pursuant to Pa.R.C.P. Nos. 4002 and 4007.1, and other relevant rules respecting discovery.



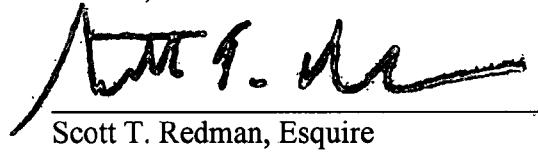
Scott T. Redman, Esquire
610 Two Chatham Center
Pittsburgh, PA 15219
Telephone: (412) 804-3355

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the within NOTICE OF DEPOSITION OF JOSEPH ANDERSON was served this 15th day of February, 2007 via United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON,

CIVIL ACTION - LAW

Plaintiffs,
vs.

Number 799 - 2006 C.D.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Type of Pleading: Certificate of Service

Defendants.

Filed on behalf of: Defendant,
James Collins

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
11:00 AM
MAR 27 2007
WM
William A. Shaw
Prothonotary/Clerk of Courts

SANDRA ANDERSON
JOSEPH P. ANDERSON,

Plaintiffs,
vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
*
*
*
*
* Number 799 - 2006 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one true and correct copy of Defendant, James Collins's, Answers and Objections to Plaintiffs' Interrogatories and an original and one true and correct copy of the Defendant, James Collins's, Responses and Objections to Plaintiffs' Request for Production of Documents were served on the 26th day of March, 2007, by Overnight Mail addressed to the following:

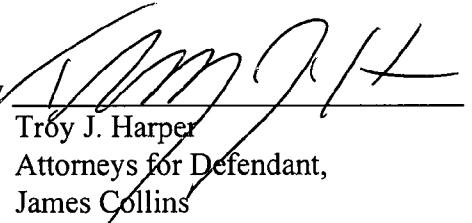
David J. Hopkins, Esquire
HOPKINS HELTZEL LLP
100 Meadow Lane, Suite 5
DuBois, PA 15801

and one copy of the same in the foregoing manner on:

Scott T. Redman, Esq.
Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, Pennsylvania 15219

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
James Collins

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

CIVIL DIVISION

Plaintiffs
vs.
No. 2006-799 CD

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

**NOTICE OF SERVICE OF ANSWERS
TO INTERROGATORIES AND
RESPONSES TO REQUEST FOR
PRODUCTION OF DOCUMENTS**

Defendants

JURY TRIAL DEMANDED

Filed on behalf of the Defendant,
Clearfield-Curwensville Country Club and
Clearfield- Curwensville Golf and Country
Club

Counsel of Record for this
Party:

Scott T. Redman, Esquire
Pa. I.D. No. 36752

Redman & Pongrace
610 Two Chatham Center
112 Washington Place
Pittsburgh, PA 15219
Telephone: (412) 804-3355
Facsimile: (412) 804-3356

FILED *NOV 11 2004*
MAY 25 2004
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs
vs.
NO. 2006-799 CD

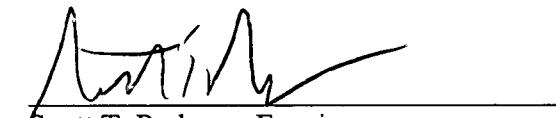
CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD-
CURWENSVILLE GOLF AND
COUNTRY CLUB and JAMES COLLINS

Defendants

NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES AND
RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

Kindly take Notice that Answers to Interrogatories and Responses to Request for
Production of Documents have been served on counsel for Plaintiffs by First Class Mail,
postage prepaid, on this 23 day of May, 2007.

Respectfully submitted,



Scott T. Redman, Esquire
Attorney for Defendant

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the
within **NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES AND**
RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS was served
this _____ day of MAY, 2007, via United States First Class Mail upon the following
counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

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

SANDRA ANDERSON
JOSEPH P. ANDERSON

Plaintiffs

vs.

CLEARFIELD-CURWENSVILLE
COUNTRY CLUB and CLEARFIELD -
CURWENSVILLE GOLF AND COUNTRY
CLUB and JAMES COLLINS,

Defendants

No. 2006-799 CD

FILED *accatty*
m/2:30pm Hopkins
JAN 18 2008

William A. Shaw
Prothonotary/Clerk of Courts

Type of Pleading: Praeclipe to Discontinue

Filed on behalf of: Sandra Anderson
and Joseph P. Anderson, Plaintiffs

Counsel of Record for this party:

HOPKINS HELTZEL LLP

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

LEA ANN HELTZEL, ESQUIRE
Attorney at Law
Supreme Court No. 83998

100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801

(814) 375-0300

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

SANDRA ANDERSON	:	
JOSEPH P. ANDERSON	:	
	Plaintiffs	:
	:	
vs.	:	No. 2006-799 CD
	:	
CLEARFIELD-CURWENSVILLE	:	
COUNTRY CLUB and CLEARFIELD -	:	
CURWENSVILLE GOLF AND COUNTRY	:	
CLUB and JAMES COLLINS,	:	
Defendants	:	

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above captioned civil action settled and discontinued.

HOPKINS HELTZEL LLP


David J. Hopkins, Esquire
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, the undersigned authority hereby certify that a true and correct copy of the within PRAECIPE TO SETTLE AND DISCONTINUE was served this 16th day of January, 2008 via United States First Class Mail upon the following counsel of record:

David J. Hopkins, Esquire
100 Meadow Lane, Suite 5
DuBois, PA 15801
(Counsel for Plaintiffs)

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Mai Street
Brookville, PA 15825
(Co-Defendant)



Scott T. Redman, Esquire

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Sandra Anderson
Joseph P. Anderson

Vs.

No. 2006-00799-CD

Clearfield-Curwensville Country Club
Clearfield-Curwensville Golf and Country Club
James Collins

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 January 18, 2008, marked:

Settled and discontinued

Record costs in the sum of \$85.00 have been paid in full by David J. Hopkins Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 18th day of January A.D. 2008.



lm

William A. Shaw, Prothonotary