

06-1346-CD  
Open Flow Gas Co. vs Latonia Company

2006-1346-CD  
Open Flow Gas vs Latonia Company

OPEN FLOW GAS SUPPLY  
CORPORATION,  
Plaintiff

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA

v.

LATONIA COMPANY,  
Defendant

NO. *06-1346-CJ*

**NOTICE TO DEFEND**

TO: Latonia Company  
P.O. Box 276  
22538 Titusville Road  
Pleasantville, PA 16341

You are being 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.**

**IF YOU CAN NOT 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.**

Pennsylvania Lawyers Referral Service  
Pennsylvania Bar Association  
100 South Street  
Harrisburg, PA 17101  
Phone (800) 692-7375

  
Michael S. Jan Janin  
Attorney for Plaintiff

**FILED** *Atty pd.*  
*3/3/17/01* *85.00*  
*AUG 21 2006*  
*WCS* *Shif*  
William A. Shaw  
Prothonotary/Clerk of Courts

OPEN FLOW GAS SUPPLY : IN THE COURT OF COMMON PLEAS  
CORPORATION, : OF CLEARFIELD COUNTY,  
Plaintiff : PENNSYLVANIA  
:  
v. :  
:  
LATONIA COMPANY, : NO.  
Defendant :  
:

**PURSUANT TO PROVISIONS OF THE FEDERAL FAIR DEBT COLLECTION  
PRACTICE ACT, YOU ARE ADVISED AND WARNED THAT THIS IS AN  
ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED  
WILL BE USED FOR THAT PURPOSE. SEE 15 U.S.C. §1692(e)(11).**

OPEN FLOW GAS SUPPLY	:	IN THE COURT OF COMMON PLEAS
CORPORATION,	:	OF CLEARFIELD COUNTY,
Plaintiff	:	PENNSYLVANIA
v.		
LATONIA COMPANY,	:	NO.
Defendant	:	

**CIVIL ACTION**

AND NOW, comes the Plaintiff, Open Flow Gas Supply Corporation, by and through its attorneys, Quinn, Buseck, Leemhuis, Toohey & Kroto, Inc., and files this Civil Action of which the following is a statement:

1. The Plaintiff, Open Flow Gas Supply Corporation (hereinafter "Plaintiff"), is a Pennsylvania corporation with a principal place of business located at P.O. Drawer J, 90 Beaver Drive, Suite 110B, DuBois, PA 15801.

2. The Defendant, Latonia Company (hereinafter "Defendant"), is believed to be a Pennsylvania corporation with a place of business located at P.O. Box 276, 22538 Titusville Road, Pleasantville, PA 16341.

3. Pursuant to the provisions of the Federal Fair Debt Collection Practice Act [15 U.S.C. Section 1692(g)] attached hereto as Exhibit "A" is a **DEBT VALIDATION STATEMENT**.

**COUNT I – OPEN FLOW GAS SUPPLIES CORPORATION V. LATONIA COMPANY**

4. Pursuant to purchase orders between the Plaintiff and the Defendant, the Plaintiff supplied the Defendant with gas services as set forth and described in a statement of said account

attached hereto, made a part hereof and marked as Exhibit "B."

5. The Defendant agreed to pay for said gas services as set forth in Exhibit "B" herein by requesting and accepting the same.

6. The Defendant is in default of its obligation to pay said account to the Plaintiff.

7. As of the date of this Complaint, the balance due and owing by the Defendant to the Plaintiff, which is in default, is \$7,919.76.

8. The Plaintiff regularly sent statements to the Defendant which was received by the Defendant without exception so as to constitute an account stated.

9. The charges for said gas services were the normal, usual, and customary charges and the Plaintiff has performed any and all conditions precedent to recovery.

10. The Defendant has never disputed the reasonableness of the charges or the Plaintiff's accounting of the charges.

11. The Plaintiff has demanded and continues to demand payment of the outstanding balance but the Defendant has refused and continues to refuse to pay the same.

12. Under the terms and conditions of the Plaintiff's sale of gas services products to the Defendant, the Defendant is liable for interest on the unpaid balance at the rate of 1½% per month.

WHEREFORE, the Plaintiff, Open Flow Gas Supply Corporation, demands judgment in its favor and against the Defendant, Latonia Company, in the amount of \$7,919.76 plus interest at the rate of 1-1/2% per month through the date of judgment, plus interest from the date of judgment at the statutory rate and the costs of suit.

COUNT II – OPEN FLOW GAS SUPPLIES CORPORATION V. LATONIA COMPANY -  
UNJUST ENRICHMENT

13. The averments contained in paragraphs 1 through 12 are incorporated herein by reference as if fully set forth.

14. It would be inequitable and unconscionable and the Defendant would be thereby unjustly enriched if the Defendant is permitted to retain the benefits.

WHEREFORE, the Plaintiff, Open Flow Gas Supply Corporation, demands judgment in its favor and against the Defendant, Latonia Company, in the amount of \$7,919.76 plus interest at the rate of 1-1/2% per month through the date of judgment, plus interest from the date of judgment at the statutory rate and the costs of suit.

COUNT III – OPEN FLOW GAS SUPPLY CORPORATION v. LATONIA COMPANY -  
(QUANTUM MERUIT)

15. The averments in paragraphs 1 through 14 of this Complaint are incorporated herein by reference as if fully set forth.

16. The Plaintiff, at the request of the Defendant, and with the Defendant's knowledge and acquiescence, supplied gas services to the Defendant.

17. In the course of supplying gas services, the Plaintiff was required to and did furnish gas services as set forth on Exhibit "B."

18. The fair market value of said gas service at the time it was received was \$31,522.47.

19. The Defendant has refused to pay the Plaintiff the fair market value of the gas services furnished although the same is due.

WHEREFORE, the Plaintiff, Open Flow Gas Supply Corporation, demands judgment in its favor and against the Defendant, Latonia Company, in the amount of \$7,919.76 plus interest

at the rate of 1-1/2% per month through the date of judgment, plus interest from the date of judgment at the statutory rate and the costs of suit.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

By 

Michael S. Jan Janin  
Pa. I.D. No. 38880  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
(814) 833-2222  
Attorneys for Plaintiff, Open Flow Gas Supply  
Corporation

Document #310628, v1

OPEN FLOW GAS SUPPLY  
CORPORATION,  
Plaintiff

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

v.

LATONIA COMPANY,  
Defendant

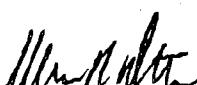
: NO.

VERIFICATION

I, William R. Deter, a representative of the Plaintiff, Open Flow Gas Supply Corporation, in the above matter, depose and say that the facts set forth in the foregoing Civil Action are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

OPEN FLOW GAS SUPPLY CORPORATION

BY

  
\_\_\_\_\_  
William R. Deter  
P.O. Drawer J  
90 Beaver Drive, Suite 110B  
DuBois, PA 15801

Dated: 8-15-06

**EXHIBIT "A"**

OPEN FLOW GAS SUPPLY	:	IN THE COURT OF COMMON PLEAS
CORPORATION,	:	OF CLEARFIELD COUNTY,
Plaintiff	:	PENNSYLVANIA
:		
v.	:	
:		
LATONIA COMPANY,	:	NO.
Defendant	:	

**DEBT VALIDATION STATEMENT**

1. The amount of the debt is \$7,919.76.
2. The name of the creditor to whom the debt is owed is Open Flow Gas Supply Corporation
3. Unless Defendant, Latonia Company, within thirty (30) days after receipt of this Notice, disputes the debt validity, or any portion thereof, the attorney signing this Complaint will assume the debt to be valid.
4. If Defendant, Latonia Company, notifies the attorney signing this Complaint in writing within the thirty (30) day period that the debt, or any portion thereof, is disputed, the attorney will obtain verification of the debt or a copy of a judgment against the Defendant, Latonia Company, and the attorney will mail a copy of such verification or judgment to the Defendant, Latonia Company, if appropriate.

5. Upon the Defendant's, Latonia Company, written request within the thirty (30) day period, the attorney will provide the Defendant, Latonia Company, with the original creditor's name and address if different from the current creditor.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

By 

Michael S. Jan Janin

Pa. I.D. No. 38880

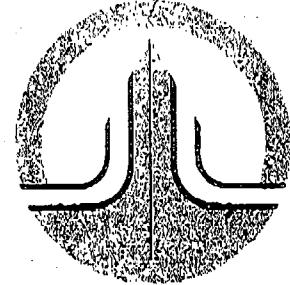
2222 West Grandview Boulevard

Erie, PA 16506-4508

(814) 833-2222

Attorneys for Plaintiff, Open Flow Gas Supply Corporation

Document #310628, v1

***Open Flow Gas Supply*****INVOICE**

LATONIA THEATER  
 C/O: RICHARD RAPASKY  
 22538 TITUSVILLE ROAD  
 PLEASANTVILLE PA 16341

**INVOICE DATE:** 07/07/2006

**INVOICE #:** 23253

**PAYMENT TERMS:** Net 10 Days

**DELIVERY PERIOD:** 6/30/2006

**NAT. GAS DELIVERIES JUNE, 2006**

Delivered Through: POFM01  
 Delivered Through: POFM01 - May adj

	<b><u>VOLUME(DTH)</u></b>	<b><u>\$/DTH</u></b>	<b><u>AMOUNT</u></b>
Delivered Through: POFM01	12	6.456	77.47T
Delivered Through: POFM01 - May adj	-2	12.692	-25.38T

SUBTOTAL \$52.09

SALES TAX (8.0%) \$3.13

**TOTAL** **\$55.22**

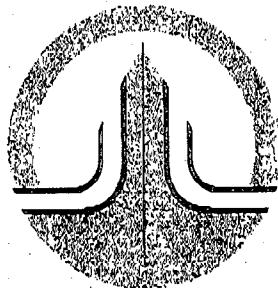
**DUE DATE:** 7/17/2006

Please remit to address below. Thank you. Please register any question or complaint prior to the Due Date.

Always report any safety problems, such as a noticeable gas odor or suspected gas leak, immediately to National Fuel's 24-hour emergency phone number: 1-800-444-3130

13

# Open Flow Gas Supply corp.



## INVOICE

LATONIA THEATER  
 C/O: RICHARD RAPASKY  
 22538 TITUSVILLE ROAD  
 PLEASANTVILLE PA 16341

**INVOICE DATE:** 06/07/2006

**INVOICE #:** 22905

**PAYMENT TERMS:** Net 10 Days

**DELIVERY PERIOD:** 5/31/2006

### NAT. GAS DELIVERIES MAY, 2006

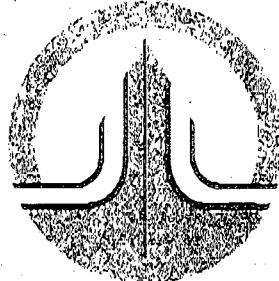
Delivered Through: POFGM01

	<b>VOLUME(DTH)</b>	<b>\$/DTH</b>	<b>AMOUNT</b>
	136	12.692	1,726.11T
<b>SUBTOTAL</b>			<b>\$1,726.11</b>
<b>SALES TAX (8.0%)</b>			<b>\$103.57</b>
<b><u>TOTAL</u></b>			<b><u>\$1,829.68</u></b>

**DUE DATE:** 6/17/2006

Please remit to address below. Thank you. Please register any question or complaint prior to the Due Date.

Always report any safety problems, such as a noticeable gas odor or suspected gas leak, immediately to National Fuel's 24-hour emergency phone number: 1-800-444-3130

**Open Flow Gas Supply****INVOICE**

LATONIA THEATER  
C/O: RICHARD RAPASKY  
22538 TITUSVILLE ROAD  
PLEASANTVILLE PA 16341

**INVOICE DATE:** 05/08/2006

**INVOICE #:** 22561

**PAYMENT TERMS:** Net 10 Days

**DELIVERY PERIOD:** 4/30/2006

**NAT. GAS DELIVERIES APRIL, 2006**

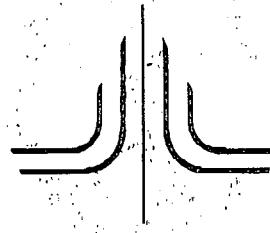
Delivered Through: POFGM01

	<b>VOLUME(DTH)</b>	<b>\$/DTH</b>	<b>AMOUNT</b>
	120	12.692	1,523.04T
<b>SUBTOTAL</b>			<b>\$1,523.04</b>
<b>SALES TAX (6.0%)</b>			<b>\$91.38</b>
<b><u>TOTAL</u></b>			<b><u>\$1,614.42</u></b>

**DUE DATE:** 5/18/2006

Please remit to address below. Thank you. Please register any question or complaint prior to the Due Date.

Always report any safety problems, such as a noticeable gas odor or suspected gas leak, immediately to National Fuel's 24-hour emergency phone number: 1-800-444-3130

**Open Flow Gas Supply****INVOICE**

LATONIA THEATER  
 C/O: RICHARD RAPASKY  
 22538 TITUSVILLE ROAD  
 PLEASANTVILLE PA 16341

**INVOICE DATE:** 04/06/2006

**INVOICE #:** 22218

**PAYMENT TERMS:** Net 10 Days

**DELIVERY PERIOD:** 3/31/2006

**NAT. GAS DELIVERIES MARCH, 2006**

Delivered Through: POFGM01

	<b><u>VOLUME(DTH)</u></b>	<b><u>\$/DTH</u></b>	<b><u>AMOUNT</u></b>
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217	12.692	2,754.16T
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SUBTOTAL	\$2,754.16
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SALES TAX (8.0%)	\$165.25
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**TOTAL** **\$2,919.41**

**DUE DATE:** 4/16/2006

Please remit to address below. Thank you. Please register any question or complaint prior to the Due Date.

Always report any safety problems, such as a noticeable gas odor or suspected gas leak, immediately to National Fuel's 24-hour emergency phone number: 1-800-444-3130

# Open Flow Gas Supply

## INVOICE

LATONIA THEATER  
 C/O: RICHARD RAPASKY  
 22538 TITUSVILLE ROAD  
 PLEASANTVILLE PA 16341

INVOICE DATE: 03/08/2006

INVOICE #: 21864

PAYMENT TERMS: Net 10 Days

DELIVERY PERIOD: 2/28/2006

### NAT. GAS DELIVERIES FEBRUARY, 2006

	<u>VOLUME(DTH)</u>	<u>\$/DTH</u>	<u>AMOUNT</u>
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Delivered Through: POFGMO1	170	12.692	2,157.64T
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SUBTOTAL	\$2,157.64
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SALES TAX (6.0%)	\$129.46
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**TOTAL** **\$2,287.10**

**DUE DATE:** 3/18/2006

Please remit to address below. Thank you. Please register any question or complaint prior to the Due Date.

**PAID**  
 P.S./S.

786.07  
 Bal. 1,501.03

Always report any safety problems, such as a noticeable gas odor or suspected gas leak, immediately to National Fuel's 24-hour emergency phone number: 1-800-444-3130

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101843  
NO: 06-1346-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: OPEN FLOW GAS SUPPLY CORPORATION  
vs.  
DEFENDANT: LATONIA COMPANY

**SHERIFF RETURN**

---

NOW, August 25, 2006, SHERIFF OF VENANGO COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON LATONIA COMPANY.

NOW, August 28, 2006 AT 3:05 PM SERVED THE WITHIN COMPLAINT ON LATONIA COMPANY, DEFENDANT. THE RETURN OF VENANGO COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

FILED  
01/01/2007  
SEP 01 2006  
*[Handwritten signature]*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101843  
NO: 06-1346-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: OPEN FLOW GAS SUPPLY CORPORATION  
vs.  
DEFENDANT: LATONIA COMPANY

**SHERIFF RETURN**

---

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	QUINN	276562	10.00
SHERIFF HAWKINS	QUINN	276562	21.00
VENANGO CO.	QUINN	276771	43.00

Sworn to Before Me This

So Answers,

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

  
Chester A. Hawkins  
Sheriff

**AFFIDAVIT OF SERVICE**  
**VENANGO COUNTY SHERIFF'S OFFICE**

Docket No. **06-1346-CD**  
**(Clearfield Co.)**

**OPEN FLOW GAS SUPPLY CORPORATION**

**Vs**

**LATONIA COMPANY**

And now, **30AUG06**, before me the undersigned authority, personally appeared **Robert O'Polka**, who being duly sworn according to law, deposes and says that on the **28<sup>th</sup>** day of **August 2006** at **1505 Hours** he served the within **Notice and Civil Action Complaint/Debt Validation Statement**, upon the defendant **Latonia Company** by handing one true and certified copy of the said documents to **Richard Repasky, Agent in Charge/Owner** located at **22538 Titusville Rd, Pleasantville, PA 16341** place of **Employment** and by making known to **him** the contents thereof.

**Venango County Costs: \$43.00**

*Robert O'Polka*

Robert O'Polka, Deputy Sheriff

*Gene Price*  
 Gene Price, Sheriff of Venango County

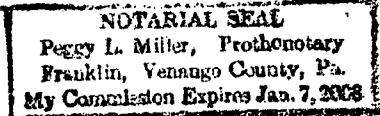
Sworn to and subscribed before

me this 30th day of

August, 2006

*Peggy L. Miller*

Prothonotary of Venango County



OPEN FLOW GAS SUPPLY CORPORATION,  
Plaintiff,

v.

LATONIA COMPANY,  
Defendant.

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

NO. 06-1346 CD

**PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT**

TO THE PROTHONOTARY:

Enter Judgment in favor of the Plaintiff, Open Flow Gas Supply Corporation, and against the Defendant, Latonia Company, for failure to file an Answer within the time prescribed by law and assess the Defendant for damages in the amount below:

Amount claimed in Plaintiff's Complaint	\$7,919.76
---	------------

Interest from August 21, 2006 through October 2, 2006 at the rate of 1 1/2% per month (\$91.08 per month; \$2.93 per day)	\$123.40
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Interest according to law from date of entry of Judgment	\$0.00
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Attorney's Fees/Collection Costs (if applicable)	\$0.00
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<b>TOTAL</b>	\$8,043.16
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Plus Court Costs of Record.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

BY:

  
Michael S. Jan Janin  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222  
Facsimile: 814-833-6753  
Counsel for Plaintiff Open Flow Gas Supply  
Corporation

**FILED** Atty pd.20.00  
m/3/2006 ICC & Notice to  
OCT 06 2006 Def.

William A. Shaw  
Prothonotary/Clerk of Courts Statement to

Atty  
OK

OPEN FLOW GAS SUPPLY  
CORPORATION,  
Plaintiff,

v.

LATONIA COMPANY,  
Defendant.

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA

NO. 06-1346 CD

---

**AFFIDAVIT**

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF ERIE :

I, Michael S. JanJanin, being duly sworn according to law, depose and say the following:

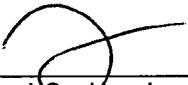
- 1) That I am the attorney for the Plaintiff, Open Flow Gas Supply Corporation, in the above-captioned matter.
- 2) The Defendant in the above entitled case is not engaged in the military service of the United States of America.
- 3) The last known address of the Defendant is:

Latonia Company  
P.O. Box 276  
22538 Titusville Road  
Pleasantville, PA

4) Pursuant to Pa.R.C.P. 237.1, I hereby certify that as attorney for the above named Plaintiff, I sent a written notice of intention to file Praeclipe for Default Judgment to the above-named Defendant(s) against whom Judgment is to be entered and to his/her/they attorney of record, if any, after the default occurred and at least day ten (10) days prior to the date of the filing of this Praeclipe. I certify that the Ten (10) Day Notice was mailed to the Defendant on October 2, 2006, and a copy of said notice is attached hereto and made a part hereof.

Respectfully submitted,

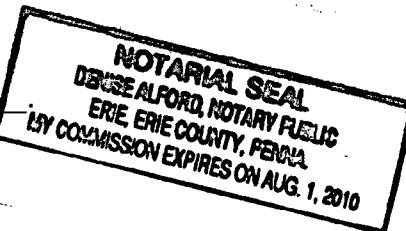
QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

BY: 

Michael S. Jan Janin  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222  
Facsimile: 814-833-6753  
Counsel for Plaintiff, Open Flow Gas  
Supply Corporation

Sworn and subscribed before me  
this 4 day of October, 2006.

Denise Aylord



OPEN FLOW GAS SUPPLY CORPORATION,  
Plaintiff,

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

v.

NO. 06-1346 CD

LATONIA COMPANY,  
Defendant.

Dated: September 19, 2006

TO: Latonia Company  
P.O. Box 276  
22538 Titusville Road  
Pleasantville, PA 16341

NOTICE

YOU ARE HEREBY IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU 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 PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE, OR 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:

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

IF YOU CAN NOT 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.

DAVID S. MEHOLICK, COURT ADMINISTRATION  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814)765-2641 Ext. 5982

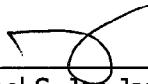
OR:

PENNSYLVANIA LAWYERS REFERRAL SERVICE  
PENNSYLVANIA BAR ASSOCIATION  
100 SOUTH STREET  
HARRISBURG, PA 17101  
(800)692-7375

BY: 

Michael S. Jan Janin, Esquire  
Pa. I.D. No. 38880  
2222 West Grandview Blvd.  
Erie, PA 16506  
(814)833-2222  
Attorney for the Plaintiff

This is to certify that the within notice was mailed to the above-named Defendant(s) by first class, postage prepaid mail on the date stated above.

BY: 

Michael S. Jan Janin, Esquire  
Pa. I.D. No. 38880  
2222 West Grandview Blvd.  
Erie, PA 16506  
(814)833-2222  
Attorney for the Plaintiff

Document #314942, v1

OPEN FLOW GAS SUPPLY CORPORATION,  
Plaintiff,

v.

LATONIA COMPANY,  
Defendant.

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

NO. 06-1346 CD



*COPY*

**NOTICE OF ENTRY OF JUDGMENT**

To: Latonia Company  
P.O. Box 276  
22538 Titusville Road  
Pleasantville, PA

You are hereby notified as required by law that a Default Judgment has been entered against you in the amount of \$8,043.16, plus interest according to law from the date of entry of Judgment, plus Court costs of record at the above term and number of October 2, 2006.

*Willie L. Chapman* 10/10/06  
\_\_\_\_\_  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Open Flow Gas Supply Corporation  
Plaintiff(s)

No.: 2006-01346-CD

Real Debt: \$8,043.16

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Latonia Company  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 6, 2006

Expires: October 6, 2011

Certified from the record this 6th day of October, 2006.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney

OPEN FLOW GAS SUPPLY CORPORATION, : IN THE COURT OF COMMON PLEAS  
Plaintiff : OF CLEARFIELD COUNTY,  
: PENNSYLVANIA  
v. :  
: NO. 06-1346 C.D.  
LATONIA COMPANY, :  
Defendant :  
:

**PRAECIPE AND POWER OF ATTORNEY**  
**FOR SATISFACTION AND/OR TERMINATION**

TO: THE PROTHONOTARY/CLERK OF SAID COURT:

You are hereby authorized, empowered, and directed to enter, as indicated, the following on the records thereof:

A. 1.  The within suit is settled, discontinued, ended and costs paid.  
2.  The within suit is settled, discontinued, ended with prejudice and costs paid.  
3.  The within suit is settled, discontinued, ended without prejudice and costs paid.

B. 1.  Satisfaction of the Award in the within suit is acknowledged.  
2.  Satisfaction of Judgment, with interest and costs, in the within matter is acknowledged.

C. 1.  Other:

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,  
INC.

Date: \_\_\_\_\_

BY \_\_\_\_\_  
Michael S. Jan Janin

**COST PAYMENT VERIFICATION**

I UNDERSTAND THAT THE ABOVE ACTION CANNOT BE FILED AND DOCKETED UNTIL ALL COSTS HAVE BEEN PAID, INCLUDING SHERIFF'S COSTS; AND HEREBY VERIFY THAT ALL COSTS HAVE BEEN PAID. I UNDERSTAND THAT FALSE STATEMENTS HEREIN ARE MADE SUBJECT TO THE PENALTIES OF 18 Pa.C.S. §4904 RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

BY \_\_\_\_\_  
Michael S. Jan Janin

Document #318406, v1

**FILED** pd \$7.00 Atty  
11:45am 100-1 Cert of  
OCT 23 2006 Sat issued  
to Atty Jan Janin  
William A. Shaw  
Prothonotary/Clerk of Courts

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QUINN·BUSECK·LEEMHUIS·TOOHEY & KROTO·INC.

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Attorneys At Law

2222 West Grandview Boulevard, Erie, PA 16506-4508 Phone: 814-833-2222 FAX: (814) 835-2076

Michael S. Jan Janin  
mjanjanin@quinnfirm.com

October 19, 2006

Prothonotary  
P.O. Box 549  
Clearfield County Court House  
Clearfield, PA 16830

**RE: Our File No. 43237.0008  
Open Flow Gas Supply Corporation v. Latonia Company  
Case No. 06-1346 CD**

Dear Sir or Madam:

Please be advised that our office represents the Plaintiff, Open Flow Gas Supply Corporation, with reference to the above-captioned matter.

Enclosed please find the original and one (1) copy of the Praecipe and Power of Attorney for Satisfaction and/or Termination which we are filing. I would greatly appreciate it if you would provide me with a time-stamped copy and return it to me in the self-addressed, stamped envelope which I am enclosing.

I am also enclosing our Firm's check in the amount of \$7.00 made payable to the "Clearfield County Prothonotary" to satisfy the judgment.

If you have any questions or if you need anything further, please do not hesitate to contact me.

Very truly yours,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

By \_\_\_\_\_  
Michael S. Jan Janin

MSJ:my  
Enclosures  
CC: Open Flow Gas Supply Corporation  
Latonia Company



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

No.: 2006-01346-CD

Open Flow Gas Supply Corporation

Debt: \$

Vs.

Atty's Comm.:

Latonia Company

Interest From:

Cost: \$7.00

NOW, Monday, October 23, 2006 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 23rd day of October, A.D. 2006.

  
\_\_\_\_\_  
Prothonotary