

2006-1666-CD
DuBois Area Educational vs DuBois Area SD

06-1666-CD
DuBois Area Educ. Vs DuBois Area S.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CA

DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS, PSEA/NEA,

Plaintiff,

v.

DuBOIS AREA SCHOOL DISTRICT

Defendant.

NO. 2006-1666-CD

CIVIL ACTION - EQUITY

TYPE OF DOCUMENT:

Complaint for Injunction

FILED ON BEHALF OF:

Plaintiff

COUNSEL FOR PLAINTIFF:

Randall C. Rodkey, Esq.
LEVENTRY, HASCHAK,
& RODKEY, LLC
1397 Eisenhower Boulevard
Richland Square III, Suite 202
Johnstown, Pennsylvania 15904
(814) 266-1799
PA ID No. 05952

FILED *10:09 AM* *12* *2006* *Atty. pd. \$5.00*
rec'd Atty

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

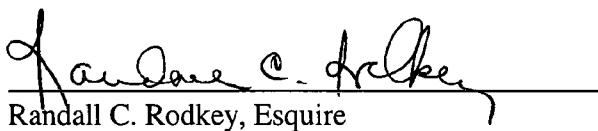
DuBOIS AREA EDUCATIONAL :
SUPPORT PROFESSIONALS, PSEA/NEA, :
: Plaintiff, :
: : NO. 2006-
v. : : CIVIL ACTION - EQUITY
DuBOIS AREA SCHOOL DISTRICT :
: Defendant. :
:

NOTICE TO DEFEND

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 CAN NOT AFFORD ONE, GO TO OR TELEPHONE
THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET
LEGAL HELP.**

Mid- Penn Legal Services, Inc.
211 1/2 East Locust Street
Clearfield, PA 16830
(800) 326-9177



Randall C. Rodkey, Esquire

COMPLAINT FOR INJUNCTION

AND NOW comes the DuBois Area Educational Support Professionals Association, PSEA/NEA, Plaintiff, by its attorney, Randall C. Rodkey, Esquire, and files the within Complaint in Equity for an Injunction against the DuBois Area School District on a cause of action whereof the following is a statement:

1. Plaintiff, DuBois Area Educational Support Professionals Association, PSEA/NEA, is an employee organization as defined in 24 PS § 11-1101-A and is the certified exclusive collective bargaining representative for all full-time secretaries, regular part-time secretaries, and teacher aides and hall monitors, cafeteria aides, health aides, child specific and bus aides employed by the DuBois Area School District.
2. Defendant, DuBois Area School District, is a school district located in Clearfield County, Pennsylvania, and is an employer as defined in 24 PS § 11-1101-A, with its office or principal place of business at 500 Liberty Boulevard, DuBois, Pennsylvania 15801.
3. On June 30, 2003, the collective bargaining agreement between Plaintiff and Defendant expired.
4. On January 7, 2003, Plaintiff and Defendant began bargaining for a successor collective bargaining agreement, which bargaining continues to date.
5. On October 5, 2006, Plaintiff engaged in a legal strike against Defendant, which strike continues to this date.
6. 24 PS § 11-1172-A precludes Defendant from utilizing, as strike breakers, any persons other than those employees who have been actively employed by Defendant at any time during the previous twelve months.

7. Despite the preclusions of 24 PS § 11-1172-A, Defendant, during said strike, has utilized individuals to operate as bargaining unit members for positions including but not limited to secretaries, teacher aides, child specific aides, cafeteria aides and nurse aides in its buildings, which individuals were not actively employed by Defendant at any time during the previous twelve months.

8. On October 5, 2006 and continuing thereafter, Defendant has utilized Sherry Jewell, owner of Jewell Bus Company as a replacement for bargaining unit member bus aide, Lois Smith, and other bargaining member bus aides, when Sherry Jewell was not employed by Defendant at any time during the previous twelve month period.

9. On October 5, 2006 and continuing thereafter, Defendant has utilized Mary Ruth Wilson, a school board member, as a replacement for secretary and bargaining unit members, Sandy Kiehlmeier, and/or Carol Rokosky, Susan Ayrant and Sandy Swope, when Mary Ruth Wilson was not employed by Defendant at any time during the previous twelve month period.

10. On October 5, 2006 and continuing thereafter, Defendant has utilized a Mr. Bodenhorn, as a replacement for child specific aide and bargaining unit member, Pat Leach, when Bodenhorn was not employed by Defendant at any time during the previous twelve month period.

11. On October 5, 2006 and continuing thereafter, Defendant has utilized Olga Chiodo, for cafeteria aide and bargaining unit member, Linda Waddell. Olga Chiodo was not employed by Defendant at any time during the previous twelve month period.

12. On October 5, 2006 and continuing thereafter, Defendant has utilized Rita Wray, a retired principal as a replacement for nurse aide and bargaining unit member, Patti Freas, when Wray was not employed by the Defendant at any time during the previous twelve month period.

13. The Plaintiff Association believes and therefore avers that other persons, none of whom were employed by the Defendant at any time during the previous twelve month period have been and will

be utilized as replacements for other bargaining unit members.

14. Defendant has utilized and continues to utilize strike breakers in violation 24 PS § 11-1172-

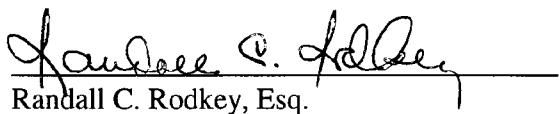
A.

15. The utilization of said strike breakers has resulted in and will continue to result in irreparable and immediate harm to Plaintiff since it has immediately negated the impact of Plaintiff's strike.

16. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff requests that this honorable court issue an injunction after hearing restraining Defendant, its agents, employees and representatives from utilizing in jobs performed by Plaintiff's members any persons other than those employees who have been actively employed by Defendant at anytime during the previous twelve months.

Respectfully submitted,



Randall C. Rodkey, Esq.

VERIFICATION

I verify that the statements made herein are true and correct to the best of my knowledge, information, and belief, and are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



President, DuBois Area ESP, PSEA/NEA

A

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

**DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS, PSEA/NEA,** :
: Plaintiff, :
: : NO. 2006-1666-C
v. : : CIVIL ACTION - EQUITY
DuBOIS AREA SCHOOL DISTRICT :
: Defendant. :
:

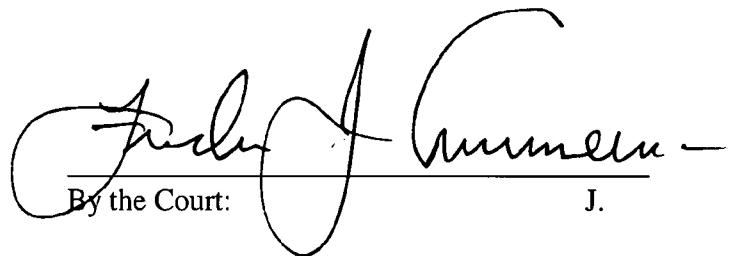
PRELIMINARY ORDER

RULE

(initials)
FILED 3CC
09/10/06 BY ATT'y
JUL 12 2006 (w/ R
serve)
William A. Shaw
Prothonotary/Clerk of Courts

AND NOW, this 12th day of October, 2006, upon consideration of the verified complaint in equity in this action and the accompanying motion for preliminary injunctive relief, it is hereby ORDERED that:

1. Defendant show cause before the Court on October 17th, 2006, at 9:00 o'clock A.m. in Courtroom 1 why a preliminary injunction should not be issued, providing the relief requested by plaintiffs; and
2. Plaintiffs cause copies of this rule to show cause, the complaint in equity, and the petition for injunctive relief to be served upon the DuBois Area School District at least 5 days before the date of the hearing.



By the Court: _____ J.

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

**DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS, PSEA/NEA,** :
Plaintiff, :
v. : NO. 2006-
DuBOIS AREA SCHOOL DISTRICT :
Defendant. : CIVIL ACTION - EQUITY

ORDER OF COURT

AND NOW to wit, this _____ day of October, 2006, the DuBois Area School District, its officers, agents and employees, are hereby enjoined from utilizing any and all persons as full-time secretaries, regular part-time secretaries, teacher aides, hall monitors, cafeteria aides, health aides, child specific and bus aides unless said persons have been actively employed by Defendant at any time during the previous twelve months.

By the Court:

J.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY PENNSYLVANIA

DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS PSEA/NEA

Plaintiffs,

NO. 2006-1666-CD

v.

DUBOIS AREA SCHOOL DISTRICT

Defendant

TYPE OF DOCUMENT:

**Answer to
Complaint for Injunction**

FILED ON BEHALF OF:

Defendant

COUNSEL FOR DEFENDANT

**Carl P. Beard, Esquire
Pa.Id. No. 33479**

**ANDREWS & BEARD
3366 Lynnwood Drive
Altoona, PA 16602
Phone: (814) 943-3304**

FILED *Fm*
OCT 16 2006
0 2175 *W*
William A. Shaw
Prothonotary/Clerk of Courts

2 CENS TO ATR

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS PSEA/NEA, :
Plaintiff : No. 2006-1666-CD
v. :
DuBOIS AREA SCHOOL DISTRICT : CIVIL ACTION- EQUITY
Defendant :
:

ANSWER TO COMPLAINT FOR INJUNCTION

AND NOW COMES the DuBois Area School District, Defendant, by its attorney, Carl P. Beard, Esquire of Andrews & Beard Law Firm, and files this Answer to the Plaintiff's Complaint for Injunction as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Paragraph 6 of Plaintiff's Complaint sets forth conclusions of law to which no response is necessary. However, to the extent a response is required, the averments of Paragraph 6 are denied to the extent that Plaintiffs are asserting that the Defendants have engaged in any improper actions.
7. Denied. By way of further response, strict proof is demanded.
8. Admitted in part, denied in part. The Defendant admits that Sherry Jewell is employed by Jewell Bus Company, with whom the Defendant contracts to perform busing

services for its students. Sherry Jewell has regularly driven buses for the Defendant in her capacity as an employee of Jewell Bus Company, during both this school year and in prior school years. Ms. Jewell and/or employees of Jewell Bus Company have also functioned as an additional coverage person in transporting special needs students to the School for the Deaf in Pittsburgh, Pennsylvania. By way of further response, as a bus driver, she would be responsible for supervising and ensuring the safety of all students on all buses that she drives. It is denied that she was used as a replacement for bargaining unit members in violation of Act 88 of 1992.

9. Admitted in part, denied in part. It is admitted that Mary Ruth Wilson volunteered to answer telephones and that the Defendant has allowed her to answer telephones at the DuBois Area Senior High School during the present strike. It is specifically denied that she was used as a replacement for any bargaining unit members. By way of further response, the Defendant asserts that the act of answering telephones is not exclusively reserved as bargaining unit work. Mrs. Wilson has not been volunteering since Thursday, October 12, 2006.

10. Denied. Mr. Bodenhorn is employed by the DuBois Jefferson County Vocational Technical School as a substitute teacher. Mr. Bodenhorn is serving as an aide for a DuBois special needs student who attends full time the DuBois Jefferson County Vocational Technical School. By way of further response, the Defendant notes that there is no requirement in 24 P.S. § 11-1172-A that an individual be employed in the same capacity as the individual he or she replaces during a strike. The law requires only that replacements be employed by the district "at any time" during the twelve month period prior to the strike.

11. Admitted in part and denied in part. Defendant admits that Olga Chiodo had volunteered for two days (October 5 and October 6, 2006) for approximately one (1) hour to

assist with safety and supervision at the Juniata Elementary School. It is denied this amounts to a violation of Act 88 of 1992.

12. Denied as stated. Defendant admits that Rita Wray is a retired principal and that Defendant has used her as a replacement during the current strike. Rita Wray has been employed by the Defendant as a substitute teacher within the twelve month period prior to the strike. By way of further response, the Defendant notes that there is no requirement in 24 P.S. § 11-1172-A that an individual be employed in the same capacity as the individual he or she replaces during a strike. The law requires only that replacements be employed by the district "at any time" during the twelve month period prior to the strike.

13. Denied. Strict proof of this averment is demanded at the hearing.

14. Denied as stated. Paragraph 14 of Plaintiff's Complaint sets forth conclusions of law to which no response is necessary. However, to the extent a response is required, the averments of Paragraph 14 are denied to the extent that Plaintiffs are asserting that the Defendants have engaged in any improper actions. Strict proof is demanded.

15. Paragraph 15 of Plaintiff's Complaint sets forth conclusions of law to which no response is necessary. However, to the extent a response is required, the averments of Paragraph 15 are denied. By way of further response, the prerequisites for preliminary injunction are that it is necessary to prevent immediate and irreparable harm which cannot be compensated by damages; second, a greater injury would result by refusing than by granting it; and third, it properly restores the parties to their status as existed immediately prior to the alleged wrongful conduct. Defendant asserts that is not the case in this particular case. Defendant asserts that Plaintiffs could file a grievance under the grievance procedure of the collective bargaining agreement and/or file an unfair labor practice charge with the Pennsylvania Labor Relations

Board. Each of those options would have a mechanism by which relief in the form of damages and/or a cease and desist order could be granted.

16. Denied. To the contrary there are numerous options available to the Plaintiffs. Plaintiffs have the ability to return to the bargaining table to attempt to resolve the impasse between the parties. In addition, pursuant to 24 P.S. 11-1125-A, Plaintiffs can pursue non-binding final best-offer arbitration under Act 88 of 1992. Section 24 P.S. 11-1125-A provides in pertinent part as follows:

- a) At any time prior to mandatory final best-offer arbitration, either the employer or the employee organization may request final best-offer arbitration unless fact-finding has been initiated as provided in section 1122-A. If fact-finding has been initiated, the parties shall complete fact-finding before requesting final best-offer arbitration. If either party requests final best-offer arbitration, the requesting party shall notify the Bureau of Mediation, the board and the opposing party in writing. The opposing party shall, within ten (10) days of the notification by the requesting party, notify the requesting party in writing of its agreement or refusal to submit to final best-offer arbitration. No strikes or lockouts shall occur during this ten (10) day period or until the requesting party is notified by the opposing party that they refuse to submit to final best-offer arbitration. Arbitration provided for in this subsection shall only occur if both parties agree to submit to final best-offer arbitration.

WHEREFORE, Defendants as this Honorable Court to deny the Plaintiff's request for injunction.

Respectfully submitted:

ANDREWS & BEARD



Carl P. Beard, Esquire
Pa.Id. No. 33479

3366 Lynnwood Drive
Altoona, PA 16602
Phone: (814) 943-3304
Counsel for Defendant,
DuBois Area School District

Date: October 16, 2006

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY PENNSYLVANIA

DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS PSEA/NEA

Plaintiffs,

NO. 2006-1666-CD

v.

CIVIL ACTION - EQUITY

DUBOIS AREA SCHOOL DISTRICT

Defendant

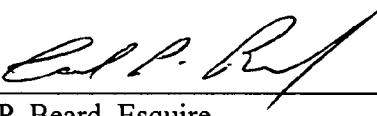
CERTIFICATE OF SERVICE

I, Carl P. Beard, Counsel for Defendant, do hereby certify that a true and correct copy of the foregoing Answer to Complaint for Injunction was served upon counsel for the Plaintiffs on October 16, 2006, as follows:

VIA FACSIMILE AND U.S. MAIL

Randall C. Rodkey, Esquire
Leventry, Haschak & Rodkey, LLC
1397 Eisenhower Boulevard
Richland Square III, Suite 202
Johnstown, PA 15904
Facsimile: 814-266-5108

ANDREWS & BEARD

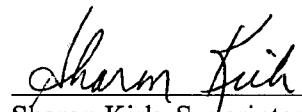

Carl P. Beard, Esquire
Pa.Id. No. 33479

3366 Lynnwood Drive
Altoona, PA 16602
Phone: (814) 943-3304
Counsel for Defendant,
DuBois Area School District

Date: October 16, 2006

VERIFICATION

I, Sharon Kirk, Superintendent of Schools for DuBois Area School District, do hereby verify that the statements in the foregoing **Answer to Complaint for Injunction** 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. §4904, relating to unsworn falsification to authorities.


Sharon Kirk
Sharon Kirk, Superintendent
DuBois Area School District

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

DUBOIS AREA EDUCATIONAL :
SUPPORT PROFESSIONALS,
PSEA/NEA

-VS-

No. 06-1666-CD

DUBOIS AREA SCHOOL
DISTRICT

FILED

OCT 17 2006

0110.351wm

William A. Shaw
Prothonotary/Clerk of Courts

CENT T- ATTYS
P. RODKEY &
C. BEAM

O R D E R

NOW, this 17th day of October, 2006, upon
agreement of the parties, it is hereby ORDERED AND DECREED
as follows:

1. The members of the bargaining unit
represented by the DuBois Area ESPN, PSEA/NEA on strike
shall return to their respective job duties and
responsibilities, effective October 18, 2006. The members
of the bargaining unit shall remain at work at least until
such time as a decision is rendered through the voluntary
non-binding arbitration process;

2. The DuBois Area ESPN, PSEA/NEA and the
DuBois Area School District shall continue to operate under
the terms and conditions of the Collective Bargaining
Agreement which expired on June 30, 2003, and until a
successor Collective Bargaining Agreement is negotiated;

3. The parties shall proceed to voluntary

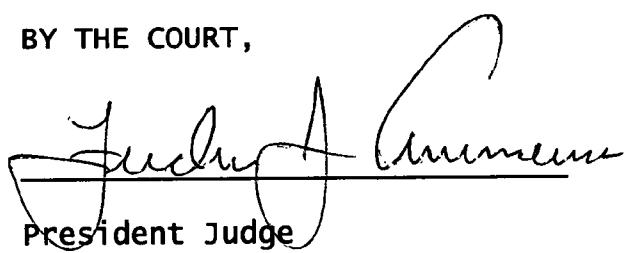
non-binding arbitration under Act 88 of 1992;

4. The Pennsylvania Bureau of Mediation shall continue to be involved in the bargaining process and the monitoring of the same;

5. The Court shall retain jurisdiction of the matter relative the complaint in equity requesting the Preliminary Injunction;

6. Hearing on the Preliminary Injunction is hereby continued until further order of Court.

BY THE COURT,



A handwritten signature in black ink, appearing to read "Judge J. Michael Connolly". The signature is written in a cursive style with a large, stylized 'J' at the beginning.

President Judge

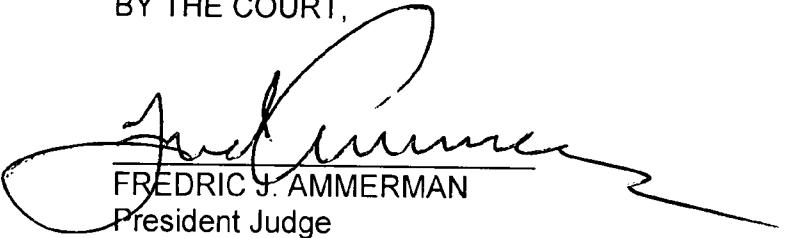
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DuBOIS AREA EDUCATIONAL SUPPORT *
PROFESSIONALS, PSEA/NEA, *
Plaintiff *
vs. * NO. 06-1666-CD
DuBOIS AREA SCHOOL DISTRICT, *
Defendant *

O R D E R

NOW, this 18th day of December, 2006, it is the ORDER of this Court that a representative of each of the parties and counsel for the parties shall appear for a conference relative the status of the arbitration process on the 18th day of January, 2007, at 9:30 A.m. in Courtroom No. 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania. The status conference may be held in chambers at the discretion of the Court.

BY THE COURT,


FREDRIC S. AMMERMAN
President Judge

FILED *cc Attns: Rod Key
0/1.50 cm
DEC 19 2006 GW*

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 12-19-2006

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

FILED

DEC 19 2006

William A. Shaw
Prothonotary/Clerk of Courts

Recd. 11/17/07
Copies of this Order
were faxed to the
Atty. Dirig.

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

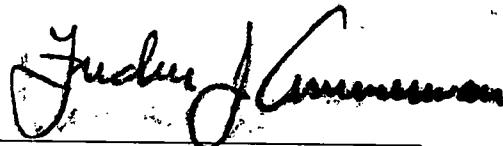
DUBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS,
vs.
DUBOIS AREA SCHOOL DISTRICT

*
*
* NO. 06-1666-CD
*

ORDER

NOW, this 16th day of January, 2007, upon receipt and review of a joint letter from counsel for the parties in the above-captioned case, it is the ORDER of this Court that the status conference scheduled for January 18, 2007 be and is hereby continued.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED *cc Atlys:*
03:50pm *Rodkey*
JAN 17 2007 *Beard*

William A. Shaw *Also Faxed to Atlys*
Prothonotary/Clerk of Courts by *Judge Ammerman*
Office
©

DATE: 1-17-07

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Superior Court

FILED

JAN 17 2007

William A. Shaw
Prothonotary/Clerk of Courts



Leventry, Haschak & Rodkey, LLC

Attorneys at Law

Sender's E-mail:
rrodkey@lhrklaw.com

Timothy C. Leventry, LL.M.*
John M. Haschak**
Randall C. Rodkey

Terry L. Graffius
Ryan J. Sedlak
Paul J. Eckenrode

Mary Beth Krause (Paralegal)
*Legal Masters Degree in Taxation
**Registered Patent Attorney

January 12, 2007

Fredric J. Ammerman, President Judge
Clearfield County Court of Common Pleas
230 East Market Street
Clearfield, PA 16830

**Re: Dubois Area Educational Support Professionals
v. Dubois Area School District
Injunction Petition, Case No. 06-1666-CD**

Dear Judge Ammerman:

We are in receipt of your December 18, 2006 (conference for January 18, 2007 at 9:30 in Courtroom

Shortly after the hearing on October 17, 2006, the parties held two very productive meetings with the Assistant Secretary of State for International Organization Affairs to discuss the Tentative Agreement. The parties have since come to an agreement on the Tentative Agreement, which should be voted on within the next few days.

Accordingly, we would ask that this matter be held in abeyance. Thank you for your consideration in this matter.

PROTH-
NOTE -
File this
letter
also
e
ve at a
:

Respectfully requested:

Randall Rodkey, Counsel for Plaintiff

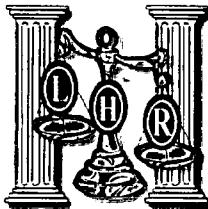
Carl P. Beard, Counsel for Defendant

FILED
03:50pm
JAN 17 2007 No cc
Fixed in per
Judge Ammerman

William A. Shaw
Prothonotary/Clerk of Courts

1397 Eisenhower Boulevard, Richland Square III, Suite 202, Johnstown, PA 15904
Telephone: 814 266-1799 Fax: 814-266-5108

Web Site: www.lhrklaw.com



Leventory, Haschak & Rodkey, LLC

Attorneys at Law

Sender's E-mail:
rrodkey@lhrklaw.com

Timothy C. Leventory, LL.M.*
John M. Haschak**
Randall C. Rodkey

Terry L. Graffius
Ryan J. Sedlak
Paul J. Eckenrode

January 12, 2007

Mary Beth Krause (Paralegal)
*Legal Masters Degree in Taxation
**Registered Patent Attorney

Fredric J. Ammerman, President Judge
Clearfield County Court of Common Pleas
230 East Market Street
Clearfield, PA 16830

**Re: Dubois Area Educational Support Professionals
v. Dubois Area School District
Injunction Petition, Case No. 06-1666-CD**

Dear Judge Ammerman:

We are in receipt of your December 18, 2006 Order scheduling a status conference for January 18, 2007 at 9:30 in Courtroom 1.

Shortly after the hearing on October 17, 2006, pursuant to your direction, the parties held two very productive meetings with the Arbitrator and were able to arrive at a Tentative Agreement. The parties have since come to terms and the final document should be voted on within the next few days.

Accordingly, we would ask that this matter be held in abeyance. Thank you for your consideration in this matter.

Respectfully requested:


Randall Rodkey, Counsel for Plaintiff


Carl P. Beard, Counsel for Defendant

FILED
03:30pm
JAN 17 2007 Fixed in per
Judge Ammerman
No. 11-17-0666-CD

William A. Shaw
Prothonotary/Clerk of Courts

1397 Eisenhower Boulevard, Richland Square III, Suite 202, Johnstown, PA 15904
Telephone: 814 266-1799 Fax: 814-266-5108

Web Site: www.lhrklaw.com

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

DuBOIS AREA EDUCATIONAL
SUPPORT PROFESSIONALS,
vs.
DuBOIS AREA SCHOOL DISTRICT

*
*
* NO. 06 - 1666 - CD
*

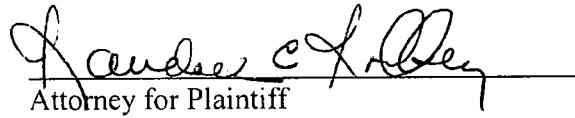
PRAECLPE

To the Prothonotary of the above named Court:

Please mark the above captioned matter settled, discontinued and forever ended.

Date:

2-9-06



Attorney for Plaintiff

FILED
M3145cm
FEB 14 2007
copy to c/a
William A. Shaw
Prothonotary/Clerk of Courts