

DOCKET NO. 173

NUMBER TERM YEAR

216 February 1961

Leroy W. Lockwood

VERSUS

Pauline McKee

In the Court of Common Pleas of Clearfield County, Pa.

Leroy W. Lockwood

19

Pauline McKee

No. 216 Feb Term 1961.

Complaint In Trespass.

Now, March 15, 1961, at 3:00 O'Clock P.M. served the within Complaint In Trespass On Pauline McKee at place of residence R.D. 3. Du Bois, Pa by handing to Edward Mc Kee an adult member of the family being the husband of Pauline McKee a true and attested copy of the original Complaint In Trespass and Made known to him the contents thereof.

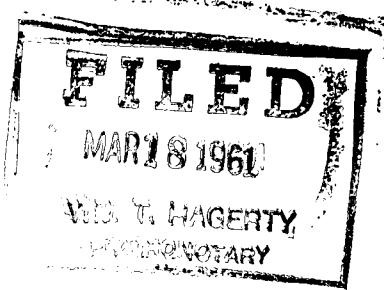
Costs; Sheriff Ammerman \$1160
(Paid by Atty Lee)

So Answers.

Charles G. Ammerman.
Sheriff.

Sworn to before me this 16th
day of March A.D. 1961.

W^m T. Haynes
Prothonotary



IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. ~~2~~ ~~2~~ Term, 1961
Trespass

LEROY W. LOCKWOOD

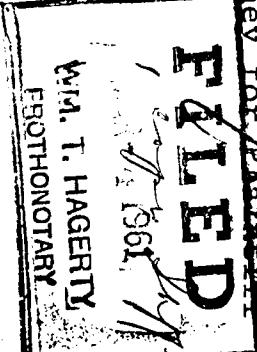
VS

PAULINE MCKEE

C O M P L A I N T

TO THE WITHIN NAMED DEFENDANT

You are hereby notified to
answer to the within Complaint
within twenty days of service
hereof.



JOSEPH J. LEE
ATTORNEY-AT-LAW
CLEARFIELD, PA.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LEROY W. LOCKWOOD

:

VS

: No. 216

February Term, 1961

PAULINE McKEE

:

Trespass

C O M P L A I N T

COMES NOW, the plaintiff, and by his attorney, Joseph J. Lee, brings this action in trespass against the above named defendant upon a cause whereof the following is a statement:

(1). The plaintiff, Leroy W. Lockwood, is an individual and resides in R.D.2, Brockway, Jefferson County, Pennsylvania.

(2). The defendant, Pauline McKee, is an individual and resides in R.D.3, DuBois, Clearfield County, Pennsylvania.

(3). On or about February 27, 1960 at approximately 5:45 P.M., the plaintiff was the owner of a 1955 model Pontiac sedan which was being driven in a southerly direction on Route 219 one quarter mile south of Brockway, Pennsylvania.

(4). At the time and place aforesaid the plaintiff's said automobile was being driven with the knowledge and consent of the plaintiff by Robert Lockwood.

(5). At the time and place aforesaid the defendant was the operator of a 1957 model Buick sedan which was being operated in a northerly direction on Route 219, and the said defendant did so negligently operate the said car as to cause it to cross over the center line of the said highway and to collide with the plaintiff's automobile, doing considerable damage thereto as set out more fully hereinafter.

(6). The defendant was negligent in that:

(a). She failed to operate her car in the proper lane of traffic as required by law.

(b). She failed to exercise proper caution and care

in operating her car under the surrounding circumstances.

(c). She failed to observe the provisions of the Pennsylvania Motor Vehicle Code.

(d). She was travelling at an excessive rate of speed under the conditions at that time.

(7). As a result of the aforesaid negligence the defendant's car struck the front end of plaintiff's automobile causing severe damage thereto which rendered the car totally unfit for the purposes for which the plaintiff used it. The value of the plaintiff's automobile was \$870.00 at the time of the aforesaid accident; salvage thereon was \$261.50.

(8). The amount in controversy is less than \$2000.00.

WHEREFORE, the plaintiff demands of the defendant the sum of \$608.50, with damages for delay.

LeRoy W. Lockwood

STATE OF PENNSYLVANIA:

:SS

COUNTY OF JEFFERSON : :

LEROY W. LOCKWOOD, being duly sworn according to law, deposes and says that the facts set forth in the within Complaint are true and correct to the best of his knowledge, information and belief.

LeRoy W. Lockwood x
(Leroy W. Lockwood)

Subscribed and sworn to before
me this 27th day of December, 1960.

Charles D. Wells

Notary Public, Dickway, Jefferson County
My Commission Expires Apr. 3, 1963.