

Erie Insurance vs Brian Peterson
2007-19-CD

07-19-CD
Erie Ins. Al vs Brian Peterson

COURT OF COMMON PLEAS OF CLEARFIELD COUNT PENNSYLVANIA
CIVIL DIVISION

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

NO. 07-19-CD

PLAINTIFF

Type of Case: Civil

BRIAN M. PETERSON

Type of Pleading: Complaint

DEFENDANT

Filed on behalf of:
Plaintiff

Counsel of record for Plaintiff:
Paul F. D'Emilio, Esquire

PA. ID#:
16654

Address:
905 W. Sproul Rd., Suite 105
Springfield, PA 19064

Telephone No.:
(610) 338-0338

January 3, 2007

March 24 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw cm
Deputy Prothonotary

Aug 27 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw ok
Deputy Prothonotary

FILED ICC Sheriff
JAN 04 2007 ICC Atty
William A. Shaw Atty pd
Prothonotary/Clerk of Courts
85.00

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE :
AS SUBROGEE OF KENT'S AUTO SERVICE :
AND KENT HERSHBER :
4901 LOUISE DRIVE :
MECHANICSBURG, PA 17055 :

VS. :

BRIAN M. PETERSON :
741 BROAD STREET :
BROCKWAY, PA 15824 :

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

NO.

CIVIL ACTION

NOTICE

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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

Lawyer Referral Service:
Pennsylvania Lawyer Referral Service
(800) 692-7375

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene (20) días de plazo a partir de la fecha de la demanda y la notificación. Usted debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte sus defensas o sus objeciones a las demandas contra su persona. Se agradece que si usted no se defiende, la corte tomará medidas y puede entrar una orden contra usted sin previo aviso o notificación o por cualquier queja o alivio que espedido en la petición de demanda. Usted puede perder dinero, sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE PARA PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE USTED PUEDE CONSEGUIR ASISTENCIA LEGAL.

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

Lawyer Referral Service:
Pennsylvania Lawyer Referral Service
(800) 692-7375

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MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO.

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

NOTICE UNDER THE FAIR DEBT COLLECTION PRACTICES ACT,
15 U.S.C. §1601 (AS AMENDED)
THE PENNSYLVANIA UNFAIR TRADE PRACTICES ACT
AND CONSUMER PROTECTION LAW,
73 PA.CON.STAT.ANN. §201, ET. SEQ. ("THE ACTS")

IN AS MUCH AS THE ACTS MAY APPLY, PLEASE BE ADVISED
THAT THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

COMPLAINT

The Plaintiff, Erie Insurance Exchange, by its attorney Paul F. D'Emilio, Esquire, bring this action upon a cause whereof the following is a statement:

1. The Plaintiff, Erie Insurance Exchange, ("Erie") is a Corporation authorized to do business in the Commonwealth of Pennsylvania, having an office at 4901 Louise Drive, Mechanicsburg, PA 17055.

Plaintiff brings this action as subrogee of Kent's Auto Service and Kent Hershber, herein the ("Insured") under a policy of insurance # Q020580119, issued by Plaintiff.

2. Defendant, Brian M. Peterson is an individual residing at 741 Broad Street, Brockway, PA 15824.

3. On or about January 15, 2005 a motor vehicle owned and operated by the Defendant, Brian M. Peterson, was traveling at the intersection of Park Avenue and Brady Street, Dubois, PA when he ran a red light and struck the insured's vehicle causing the damages hereinafter set forth.

4. The Insured's vehicle was a total loss and Defendant is liable to Plaintiff for the damages as allowed by law thereto being is **Eleven Thousand Eight Hundred Sixty Seven and 50/100 (\$11,867.50) Dollars** plus the Insured's deductible of **Two Hundred Fifty and 00/100 (\$250.00) Dollars** less salvage received of **Two Thousand Nine Hundred Six 00/100 (\$2,906.00) Dollars** for a total of **Nine Thousand Two Hundred Eleven and 50/100 (\$9,211.50) Dollars.**

5. The occurrence was the result of the negligence of the Defendant, Brian M. Peterson, in that he:

- a. did fail to have the motor vehicle under proper and adequate control;
- b. did fail to apply the brakes in time to avoid the collision;
- c. did negligently apply the brakes;
- d. did fail to observe Insured's property;
- e. did fail to operate the vehicle in accordance with existing conditions;
- f. did permit or allow the vehicle to strike and collide with the insured's property;
- g. did fail to drive at a speed and in the manner that would allow him to stop within the assured clear distance ahead;
- h. did fail to keep a reasonable lookout for other vehicles lawfully on the road;
- i. did operate the motor vehicle without due regard for the rights, safety and position of the Insured at the point of aforesaid and in a reckless manner;
- j. did fail to obey and observe existing traffic conditions and traffic controls;

- k. did fail to properly observe traffic signals controlling his direction of travel;
- l. did fail to maintain financial responsibility; and
- m. did violate the various statutes and laws of the Commonwealth of Pennsylvania and County of Allegheny, pertaining to the operation of motor vehicles.

WHEREFORE, Plaintiff demands judgment against the Defendants upon each count in an amount not in excess of Fifty Thousand and 00/100 (\$50,000.00) dollars together with costs of suit.



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, Paul F. D'Emilio counsel for Erie Insurance Exchange, PLAINTIFF in the above captioned matter being authorized to do so verifies that the facts contained in the foregoing Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 1/3/07


Paul F. D'Emilio
Paul F. D'Emilio, Esquire

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

PRAECIPE TO SUBSTITUTE VERIFICATION
TO PLAINTIFF'S COMPLAINT

TO THE PROTHONOTARY, C.P.:

Kindly substitute the attached verification to Plaintiff's Complaint which is signed by the Plaintiff, filed in the above entitled action on January 4, 2007.



Paul F. D'Emilio, Esquire
Attorney for Plaintiff

FILED *(initials)*
JAN 11 2007
m 11:10 AM
William A. Shaw
Prothonotary/Clerk of Courts
No Court Comm

VERIFICATION

Jennifer Martin, Subrogation Specialist with Erie Insurance Exchange in the above captioned matter verifies that the facts contained in the foregoing Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 12-28-06
Jennifer Martin

Jennifer Martin
Subrogation Specialist

RECEIVED
JAN 03 2007
SCANNED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102311
NO: 07-19-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: ERIE INSURANCE EXCHANGE as subrogee of Kent's Auto Service
and Kent Hershber
vs.
DEFENDANT: BRIAN M. PETERSON

SHERIFF RETURN

NOW, January 08, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON BRIAN M. PETERSON.

NOW, February 06, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT ON BRIAN M. PETERSON,
DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS
RETURN MARKED "NOT FOUND".

FILED
02/07/07
APR 30 2007
WAS
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102311
NO: 07-19-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ERIE INSURANCE EXCHANGE as subrogee of Kent's Auto Service
and Kent Hershber

vs.

DEFENDANT: BRIAN M. PETERSON

SHERIFF RETURN

RETURN COSTS

| Description | Paid By | CHECK # | AMOUNT |
|-----------------|----------|---------|--------|
| SURCHARGE | D'EMILIO | 2259 | 10.00 |
| SHERIFF HAWKINS | D'EMILIO | 2259 | 26.00 |
| JEFFERSON CO. | D'EMILIO | 2260 | 35.40 |

Sworn to Before Me This

So Answers,

____ Day of _____ 2007


Chester A. Hawkins
Sheriff

No. 07-19 C.D.

Now, February 6, 2007 I return the Notice and Complaint for BRIAN M. PETERSON, Defendant, to the Clearfield County Sheriff's Office marked "not found; defendant has moved and left no forwarding address".

| | | |
|-------------------------|----------|------|
| Advance Costs Received: | \$125.00 | |
| My Costs: | 33.40 | Paid |
| Prothy: | 2.00 | |
| Total Costs: | 35.40 | |
| REFUNDED: | \$ 89.60 | |

Sworn and subscribed *7/4/07*
to before me this 1
day of Feb 2007
By Deputy Sheriff

My Commission Expires the
1st Monday, January 2010

So Answers,

James A. Densler
Sheriff
JEFFERSON COUNTY, PENNSYLVANIA

COURT OF COMMON PLEAS OF CLEARFIELD COUNT PENNSYLVANIA
CIVIL DIVISION

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

NO. 07-19-CD

PLAINTIFF

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BRIAN M. PETERSON

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DEFENDANT

Filed on behalf of:
Plaintiff

Counsel of record for Plaintiff:
Paul F. D'Emilio, Esquire

PA. ID#:
16654

Address:
905 W. Sproul Rd., Suite 105
Springfield, PA 19064

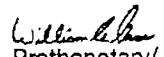
Telephone No.:
(610) 338-0338

January 3, 2007

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

JAN 04 2007

Attest.


William L. Hersh
Prothonotary/
Clerk of Courts

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
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4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

NO.

CIVIL ACTION

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Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

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(800) 692-7375

AVISO

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LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE PARA PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE USTED PUEDE CONSEGUIR ASISTENCIA LEGAL.

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Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

Lawyer Referral Service:
Pennsylvania Lawyer Referral Service
(800) 692-7375

Chlorophyll content of the epiphytic lichen *Physcia biziana* in a tropical forest of the Amazon basin

Chlorophyll content of the epiphytic lichen *Physcia biziana* in a tropical forest of the Amazon basin

3. On or about January 15, 2005 a motor vehicle owned and operated by the Defendant, Brian M. Peterson, was traveling at the intersection of Park Avenue and Brady Street, Dubois, PA when he ran a red light and struck the insured's vehicle causing the damages hereinafter set forth.

4. The Insured's vehicle was a total loss and Defendant is liable to Plaintiff for the damages as allowed by law thereto being is **Eleven Thousand Eight Hundred Sixty Seven and 50/100 (\$11,867.50) Dollars** plus the Insured's deductible of **Two Hundred Fifty and 00/100 (\$250.00) Dollars** less salvage received of **Two Thousand Nine Hundred Six 00/100 (\$2,906.00) Dollars** for a total of **Nine Thousand Two Hundred Eleven and 50/100 (\$9,211.50) Dollars.**

5. The occurrence was the result of the negligence of the Defendant, Brian M. Peterson, in that he:

- a. did fail to have the motor vehicle under proper and adequate control;
- b. did fail to apply the brakes in time to avoid the collision;
- c. did negligently apply the brakes;
- d. did fail to observe Insured's property;
- e. did fail to operate the vehicle in accordance with existing conditions;
- f. did permit or allow the vehicle to strike and collide with the insured's property;
- g. did fail to drive at a speed and in the manner that would allow him to stop within the assured clear distance ahead;
- h. did fail to keep a reasonable lookout for other vehicles lawfully on the road;
- i. did operate the motor vehicle without due regard for the rights, safety and position of the Insured at the point of aforesaid and in a reckless manner;
- j. did fail to obey and observe existing traffic conditions and traffic controls;

VERIFICATION

I, Paul F. D'Emilio counsel for Erie Insurance Exchange, PLAINTIFF in the above captioned matter being authorized to do so verifies that the facts contained in the foregoing Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 1/3/07


Paul F. D'Emilio
Paul F. D'Emilio, Esquire

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

PRAECIPE TO REINSTATE THE COMPLAINT

TO THE PROTHONOTARY, C.P.:

Kindly reinstate the **Complaint** in the above-captioned matter.


PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED *Atty pd.*
7/13/07 7:00
AUG 27 2007 CC-1 Compl.
William A. Shaw
Prothonotary/Clerk of Courts
Reinstated to
Sheriff
(GK)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103135
NO: 07-19-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: ERIE INSURANCE EXCHANGE as subrogee
VS.
DEFENDANT: BRIAN M. PETERSON

SHERIFF RETURN

NOW, August 28, 2007, SHERIFF OF DAUPHIN COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON BRIAN M. PETERSON.

NOW, ATTEMPTED TO SERVE THE WITHIN COMPLAINT ON BRIAN M. PETERSON, DEFENDANT. THE RETURN OF DAUPHIN COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

FILED
01/14/08
JAN 21 2008
WAS

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103135
NO: 07-19-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ERIE INSURANCE EXCHANGE as subrogee
VS.
DEFENDANT: BRIAN M. PETERSON

SHERIFF RETURN

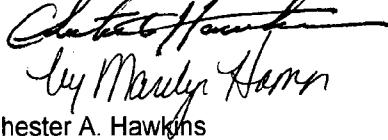
RETURN COSTS

| Description | Paid By | CHECK # | AMOUNT |
|-----------------|----------|---------|--------|
| SURCHARGE | D'EMILIO | 3449 | 10.00 |
| SHERIFF HAWKINS | D'EMILIO | 3449 | 10.00 |
| DAUPHIN CO. | D'EMILIO | 3450 | 29.25 |

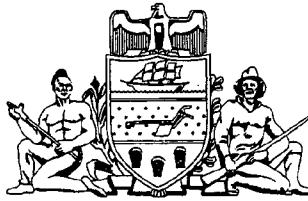
Sworn to Before Me This

So Answers,

____ Day of _____ 2008


Chester A. Hawkins
Sheriff

Office of the Sheriff



Mary Jane Snyder
Real Estate Deputy

William T. Tully
Solicitor

Charles E. Sheaffer
Chief Deputy

Michael W. Rinehart
Assistant Chief Deputy

Dauphin County
Harrisburg, Pennsylvania 17101
ph: (717) 780-6590 fax: (717) 255-2889

Jack Lotwick
Sheriff

Commonwealth of Pennsylvania : ERIE INSURANCE EXCHANGE
County of Dauphin : vs
: PETERSON BRIAN M

Sheriff's Return

No. 1262-T - - - 2007
OTHER COUNTY NO. 07 19 CD

I, Jack Lotwick, Sheriff of the County of Dauphin, State of Pennsylvania, do hereby certify and return, that I made diligent search and inquiry for PETERSON BRIAN M the DEFENDANT named in the within COMPLAINT and that I am unable to find him/her in the County of Dauphin, and therefore return same **NOT FOUND**, September 4, 2007

PROPERTY VACANT, FOR SALE THROUGH KEYSTONE BROKER GROUP

Sworn and subscribed to
before me this 5TH day of SEPTEMBER, 2007

NOTARIAL SEAL
MARY JANE SNYDER, Notary Public
Highspire, Dauphin County
My Commission Expires Sept 1, 2010

So Answers,

Sheriff of Dauphin County, Pa.

By

Deputy Sheriff
Sheriff's Costs: \$29.25 PAID BY COUNTY

EMBREY

ORDER OF SERVICE

Date August 22, 2007

Term No. _____

ALL INFORMATION AND ADVANCE COSTS MUST BE SUPPLIED BY ATTORNEY BEFORE SERVICE CAN BE MADE
ONE "ORDER FOR SERVICE" FORM FOR EACH ADDRESS.

TO: DAUPHIN COUNTY SHERIFF'S OFFICE FROM: PAUL F. D'EMILIO, ESQUIRE
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

CASE CAPTION:

TYPE OF PAPER: Civil Complaint

| | | |
|--|---|--|
| ERIE INSURANCE EXCHANGE AS SUBROGEE OF KENT'S AUTO SERVICE AND KENT HERSHBER 4901 LOUISE DRIVE MECHANICSBURG, PA 17055 | : | COMMON PLEAS COURT OF CLEARFIELD COUNTY |
| VS. | : | NO. |
| BRIAN M. PETERSON 741 BROAD STREET BROCKWAY, PA 15824 | : | CIVIL ACTION |

SERVICE TO MADE ON BRIAN M. PETERSON
(Name of individual, company, etc. to be served)

ADDRESS WHERE SERVICE CAN BE
MADE (must include zip code): 1942 ZARKER STREET, HARRISBURG, PA 17104
(NO P.O. BOX)

SPECIAL INSTRUCTION:

(i.e. deputized service (within PA only - specify county), certified mail, etc)

Kindly serve the Defendant with a true and correct copy of the Complaint.

INCLUDE SELF-ADDRESSED STAMPED ENVELOPE FOR MAILING OF RECEIPT AFTER SERVICE IS COMPLETE



COUNTY OF DAUPHIN
HARRISBURG, PA.

J. R. LOTWICK
SHERIFF OF DAUPHIN COUNTY
OFFICIAL RECEIPT

RECEIPT NUMBER... 234482 RECEIPT DATE... 09/04/2007
RECEIVED FROM... PAUL D'EMILIO
DESCRIPTION..... (1) CIVIL ACTION-NOTICE OPERATOR..... TF
DOCKET NUMBER... 1262T 2007
DEFENDANT..... BRIAN PETERSON

COUNTY.... *****29.25
STATE.... *****.00
AGENCY.... *****.00
TOTAL.... *****29.25

CASH.... *****.00
CHECK.... *****29.25

RECD. BY

COURT OF COMMON PLEAS OF CLEARFIELD COUNT PENNSYLVANIA
CIVIL DIVISION

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

NO. 07-19-CD

PLAINTIFF

Type of Case: Civil

BRIAN M. PETERSON

Type of Pleading: Complaint

DEFENDANT

Filed on behalf of:
Plaintiff

Counsel of record for Plaintiff:
Paul F. D'Emilio, Esquire

PA. ID#:
16654

Address:
905 W. Sproul Rd., Suite 105
Springfield, PA 19064

Telephone No.:
(610) 338-0338

January 3, 2007

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

8/27/07 Document
Reinstated/Reissued to Sheriff Attorney
for service.

William L. Shan
Deputy Prothonotary

JAN 04 2007

Attest.

William L. Shan
Prothonotary/
Clerk of Courts

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
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AS SUBROGEE OF KENT'S AUTO SERVICE :
AND KENT HERSHBER :
4901 LOUISE DRIVE :
MECHANICSBURG, PA 17055 :

COMMON PLEAS COURT OF
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Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

Lawyer Referral Service:
Pennsylvania Lawyer Referral Service
(800) 692-7375

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene (20) dias de plazo a partir de la fecha de la demanda y la notificacion. Usted debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte sus defensas o sus objeciones a las demandas encontra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede entrar una orden contra usted sin previo aviso o notificacion o por cualquier queja o alivio que espedido en la peticion de demanda. Usted puede perder dinero, sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE PARA PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE USTED PUEDE CONSEGUIR ASISTENCIA LEGAL.

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, ext. 51

Lawyer Referral Service:
Pennsylvania Lawyer Referral Service
(800) 692-7375

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO.

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

NOTICE UNDER THE FAIR DEBT COLLECTION PRACTICES ACT,
15 U.S.C. §1601 (AS AMENDED)
THE PENNSYLVANIA UNFAIR TRADE PRACTICES ACT
AND CONSUMER PROTECTION LAW,
73 PA.CON.STAT.ANN. §201, ET. SEQ. ("THE ACTS")

IN AS MUCH AS THE ACTS MAY APPLY, PLEASE BE ADVISED
THAT THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

COMPLAINT

The Plaintiff, Erie Insurance Exchange, by its attorney Paul F. D'Emilio, Esquire, bring this action upon a cause whereof the following is a statement:

1. The Plaintiff, Erie Insurance Exchange, ("Erie") is a Corporation authorized to do business in the Commonwealth of Pennsylvania, having an office at 4901 Louise Drive, Mechanicsburg, PA 17055.

Plaintiff brings this action as subrogee of Kent's Auto Service and Kent Hershber, herein the ("Insured") under a policy of insurance # Q020580119, issued by Plaintiff.

2. Defendant, Brian M. Peterson is an individual residing at 741 Broad Street, Brockway, PA 15824.

3. On or about January 15, 2005 a motor vehicle owned and operated by the Defendant, Brian M. Peterson, was traveling at the intersection of Park Avenue and Brady Street, Dubois, PA when he ran a red light and struck the insured's vehicle causing the damages hereinafter set forth.

4. The Insured's vehicle was a total loss and Defendant is liable to Plaintiff for the damages as allowed by law thereto being is **Eleven Thousand Eight Hundred Sixty Seven and 50/100 (\$11,867.50) Dollars** plus the Insured's deductible of **Two Hundred Fifty and 00/100 (\$250.00) Dollars** less salvage received of **Two Thousand Nine Hundred Six 00/100 (\$2,906.00) Dollars** for a total of **Nine Thousand Two Hundred Eleven and 50/100 (\$9,211.50) Dollars.**

5. The occurrence was the result of the negligence of the Defendant, Brian M. Peterson, in that he:

- a. did fail to have the motor vehicle under proper and adequate control;
- b. did fail to apply the brakes in time to avoid the collision;
- c. did negligently apply the brakes;
- d. did fail to observe Insured's property;
- e. did fail to operate the vehicle in accordance with existing conditions;
- f. did permit or allow the vehicle to strike and collide with the insured's property;
- g. did fail to drive at a speed and in the manner that would allow him to stop within the assured clear distance ahead;
- h. did fail to keep a reasonable lookout for other vehicles lawfully on the road;
- i. did operate the motor vehicle without due regard for the rights, safety and position of the Insured at the point of aforesaid and in a reckless manner;
- j. did fail to obey and observe existing traffic conditions and traffic controls;

- k. did fail to properly observe traffic signals controlling his direction of travel;
- l. did fail to maintain financial responsibility; and
- m. did violate the various statutes and laws of the Commonwealth of Pennsylvania and County of Allegheny, pertaining to the operation of motor vehicles.

WHEREFORE, Plaintiff demands judgment against the Defendants upon each count in an amount not in excess of Fifty Thousand and 00/100 (\$50,000.00) dollars together with costs of suit.



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, Paul F. D'Emilio counsel for Erie Insurance Exchange, PLAINTIFF in the above captioned matter being authorized to do so verifies that the facts contained in the foregoing Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 1/3/07



Paul F. D'Emilio, Esquire

FILED

JAN 21 2008

William A. Shaw
Prothonotary/Clerk of Courts

DAWNE
SHG
DWG

90-6 W 12 and 13

GE 2008

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

PRAECIPE TO REINSTATE THE COMPLAINT

TO THE PROTHONOTARY, C.P.:

Kindly reinstate the **Complaint** in the above-captioned matter.


PAUL F. D'EMILIO, ESQUIRE

ATTORNEY FOR PLAINTIFF

pd \$7.00 Atty
FILED 1 Complaint
m/2:35pm MAR 24 2008
reinstated to Atty.
William A. Shaw
Prothonotary/Clerk of Courts

Erie Insurance Exchange as Subrogee of Kent's Auto
Service and Kent Hershber

Case No.: 07-19-CD

Plaintiff

Brian M. Peterson

Defendant

FILED NOCC
MAY 01 2008
William A. Shaw
Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE

That I, ALAN M. JACKSON hereby solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing document are true and do affirm I am a competent person over 18 years of age and not a party to this action.

That I served: Brian M. Peterson with the following list of documents: Reinstated Complaint by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with
WENDY PETERSON Title/relationship: MOTHER

That on 4/11/08 at 10:13 AM at the address of 6909C CARNATION ST service was made by;

Personal Service: By personally delivering the documents to the person being served.

Substitute Service: By leaving the documents at the dwelling house or usual place of abode of the person being served with a member of the household who stated they resided herein and was of suitable age and discretion, and was explained the general nature of the documents.

Corporate, Registered Agent or Legal Representative Service: By leaving with an officer, director or a person who stated they had authority to accept service of process for the above listed person or entity.

By affixing a true copy of each to the door of said premises, which is recipient's actual place of abode

Description: Skin: W Sex: F Age: Apx 50 Height: Apx 5'6" Weight: Apx 220 Hair: BR Glasses: Y

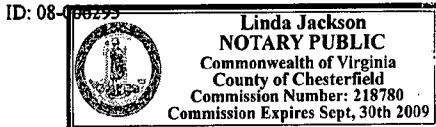
Military Service. Deponent asked the person spoken to whether the recipient was presently in military service of the United States or of the State in which they reside and was informed that the recipient was not.
I declare under penalties of perjury that the information contained herein is correct to the best of my knowledge.


Due Process
P.O. Box 2396
Columbia, MD 21045
(800) 228-0484

4/11/08
Executed on:

Subscribed and sworn to before me, a notary public, on this 1st day of April, 2008.

Linda Jackson
Notary Public



Court of Common Pleas
Clearfield County, Pennsylvania

ERIE INSURANCE EXCHANGE AS SUBROGEE OF) Case No.: 07-19-CD
KENT'S AUTO SERVICE AND KENT HERSHBER)
)
Plaintiff)
v.)
BRIAN M. PETERSON)
)
Defendant)

FILED NO CC
M 7/17/2008
JUL 17 2008
GID

William A. Shaw
Prothonotary/Clerk of Courts

AMENDED AFFIDAVIT OF SERVICE

That I, Alan M. Jackson, hereby solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the following document are true and do affirm I am a competent person over 18 years of age and not a party to this action.

That on 4/1/08 at 10:13 AM pm at 6909 Carnation Street, Apt.C, Richmond, VA 23225 I served Brian M. Peterson with the following list of documents: Reinstated Complaint by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with Wendy Peterson, whose relationship to the person being served is Mother.

6909 C Carnation St Richmond VA 23225
Address City State Zip

That the address above is the dwelling house or usual place of abode of the person being served.

That the person having left the documents with stated he/she is a member of the household who resides therein with the person being served and was of suitable age and discretion

That the person having left the documents with was explained the general nature of said documents.

That the description of the person actually served is as follows:

Skin: W Sex: F Age: 50 Height: 5'5 Weight: 220 Hair: Brown Glasses: Y

Alan Jackson

Alan Jackson
A.H. Parker & Associates, Inc. d/b/a Due Process
P.O. Box 2396
Columbia, MD 21045
(800) 228-0484

7-7-08
Executed on:

Subscribed and sworn to before me, a notary public, on this 7th day of July, 2008.

Roland L. Gonzales
Notary Public
Roland L. Gonzales

My Commission Expires: 07-11-09

ID: 08-006295

Client Reference: 2006-206



My comm. exp. July 11, 2009

Erie Insurance Exchange as Subrogee of Kent's Auto
Service and Kent Hershber

) Case No.: 07-19-CD

Plaintiff)
v.)
Brian M. Peterson)
Defendant)

)
)
)
)
)

FILED
11-20

MAY 01 2008

William A. Shaw
Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE

That I, ALAN M. JACKSON hereby solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing document are true and do affirm I am a competent person over 18 years of age and not a party to this action.

That I served: Brian M. Peterson with the following list of documents: Reinstated Complaint by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with

WENDY PETERSON Title/relationship: MOTHER

That on 4/11/08 at 10:13 AM at the address of 6909 CARNATION ST service was made by;

Personal Service: By personally delivering the documents to the person being served.

Substitute Service: By leaving the documents at the dwelling house or usual place of abode of the person being served with a member of the household who stated they resided herein and was of suitable age and discretion, and was explained the general nature of the documents.

Corporate, Registered Agent or Legal Representative Service: By leaving with an officer, director or a person who stated they had authority to accept service of process for the above listed person or entity.

By affixing a true copy of each to the door of said premises, which is recipient's actual place of abode

Description: Skin: W Sex: F Age: Apx 50 Height: Apx 5'5" Weight: Apx 220 Hair: BR Glasses: Y

Military Service. Deponent asked the person spoken to whether the recipient was presently in military service of the United States or of the State in which they reside and was informed that the recipient was not.

I declare under penalties of perjury that the information contained herein is correct to the best of my knowledge.

Linda Jackson

Due Process

4/11/08
Executed on:

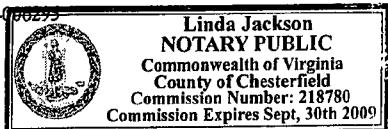
P.O. Box 2396
Columbia, MD 21045
(800) 228-0484

Subscribed and sworn to before me, a notary public, on this 1st day of April, 2008.

Linda Jackson
Notary Public

My Commission Expires: 9-30-09

ID: 08-000293



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON

CIVIL ACTION

PRAECIPE FOR JUDGMENT AND ASSESSMENT OF DAMAGES

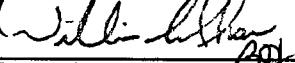
TO THE PROTHONOTARY, C.P.:

Enter Judgment in the above entitled matter in favor of the Plaintiff, Erie Insurance, and against the Defendant, Brian M. Peterson, for want of an answer, and assess Plaintiff's damages in the sum of \$9,211.50 in accordance with a Complaint filed.



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF
ATTORNEY I.D. #16654

Prothy assesses Plaintiff's damages in the sum of \$9,211.50.


PRO PROTHY

FILED Atty pd. \$20.00
MTH:23/07
JUL 17 2008 ICC & Notice to Def.
ICC Statement to Atty
William A. Shaw
Prothonotary/Clerk of Courts
(60)

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER
ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON

CIVIL ACTION

**AFFIDAVIT OF LAST KNOWN MAILING
ADDRESS OF DEFENDANT AND PLAINTIFF**

Paul F. D'Emilio, Esquire, attorney for Plaintiff in the above-entitled matter
hereby certifies that the following is the last known mailing address of the Defendant
and Plaintiff:

DEFENDANT: BRIAN M. PETERSON
6909 CARNATION ST., APT. C
RICHMOND, VA 23225

PLAINTIFF: ERIE INSURANCE COMPANY
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER
ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON

CIVIL ACTION

AFFIDAVIT AS TO NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF DELAWARE

SS

PAUL F. D'EMILIO, being duly sworn according to law, deposes and says that he is the agent for the Plaintiff above-named and is authorized to and does make this **Affidavit** on its behalf; and that he has knowledge of the facts set forth herein:

That Defendant, Brian Peterson, is over twenty-one years of age and that he is not in the military service of the United States or otherwise within the provisions of the **Soldier's and Sailor's Civil Relief Act of 1940** as amended.


PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 9 DAY
OF JUNE, 2008.

Melissa O'Neill
NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

MELISSA O'NEILL, Notary Public
Springfield Twp., Delaware County

My Commission Expires December 6, 2011.

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON

CIVIL ACTION

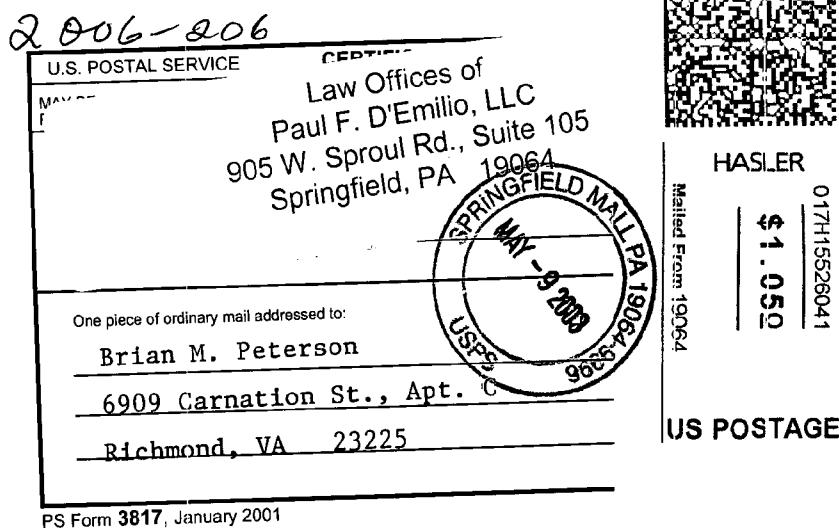
AFFIDAVIT OF NOTICE OF INTENT TO ENTER DEFAULT JUDGEMENT

I, PAUL F. D'EMILIO, ESQUIRE, attorney for the Plaintiff, **Erie Insurance Exchange**, does hereby certify that a **Notice of Intent to Enter Default Judgement** was mailed on **May 9, 2008** to the Defendant listed below by Certificate of Mailing; a copy of the Notice and the original certification of mailing are attached hereto, made a part hereof, and marked Exhibit "A".

Brian M. Peterson
6909 Carnation St., Apt. C
Richmond, VA 23225


PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

EXHIBIT "A"



PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON

CIVIL ACTION

DATE OF NOTICE: MAY 8, 2008

TO: BRIAN M. PETERSON
6909 CARNATION ST., APT. C
RICHMOND, VA 23225

NOTICE OF INTENT TO ENTER DEFAULT JUDGMENT

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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

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

LAWYER REFERENCE SERVICE FOR CLEARFIELD COUNTY
COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
SECOND AND MARKET STREETS
CLEARFIELD, PA 16830
(814) 765-2641 Ext. 50-51


PAUL F. D'EMILIO, ESQUIRE
ATTORNEY FOR PLAINTIFF

COPY

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION- LAW
(Rule of Civil Procedure No. 236)

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER

VS.

BRIAN M. PETERSON

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

NO. 07-19-CD

CIVIL ACTION

Notice is given that a judgment in the above captioned matter has been entered
against you on July 17, 2008.


Prothonotary

If you have any questions concerning the above please contact:

Paul F. D'Emilio, Esquire
Attorney or Party Filing

905 West Sproul Road, Suite 105
Address

Springfield, PA 19064
City, State, Zip

(610) 338-0338
Telephone Number

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

COPY

Erie Insurance Exchange
Kent's Auto Service
Kent Hershber
Plaintiff(s)

No.: 2007-00019-CD

Real Debt: \$9,211.50

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Brian M. Peterson Entry: \$20.00
Defendant(s)

Instrument: Default Judgment

Date of Entry: July 17, 2008

Expires: July 17, 2013

Certified from the record this 17th day of July, 2008.



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

DL-201 (4-08)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

TO THE SECRETARY OF TRANSPORTATION

July 17, 2008

This is to certify that on July 17, 2008 a judgment

for \$ **9211.50** (AMOUNT) plus \$ **(COST)** was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

| NAME | | | SEX | DATE OF BIRTH | | |
|-------|--------|----------|-----|---------------|-----|------|
| FIRST | MIDDLE | LAST | M | MONTH | DAY | YEAR |
| Brian | M | Peterson | M | 10 | 6 | 1985 |

ADDRESS: P.O. Box number may be used in addition to the actual address, but cannot be used as the only address.

| | | | |
|---------------|-------|------------------|------------------------|
| CITY | STATE | ZIP CODE | SOCIAL SECURITY NUMBER |
| Richmond | VA | 23225 | 166-66-9819 |
| DRIVER NUMBER | STATE | DATE OF ACCIDENT | CLAIM NUMBER |
| | | 01/15/2005 | 01011054228 |

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Erie Insurance Exchange

(NAME)

4901 Lousie Drive

(STREET ADDRESS)

Mechanicburg PA 17055

(CITY & STATE)

(ZIP)

(814) 375-1370

(TELEPHONE NUMBER)

**REPRESENTATIVE FOR THE JUDGMENT
CREDITOR (If applicable)**

Paul F. D'Emilio, Esq.

(NAME)

905 W. Sproul Road, Suite 105

(STREET ADDRESS)

Springfield, PA 19064

(CITY & STATE)

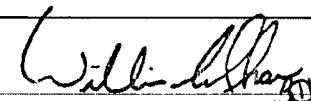
(ZIP)

(610) 338-0338

(TELEPHONE NUMBER)

THE ABOVE MENTIONED JUDGMENT AROSE FROM A MOTOR VEHICLE ACCIDENT. SIXTY DAYS HAVE ELAPSED SINCE THE ENTRY OF SAID JUDGMENT, AND THE SAME HAS NOT BEEN SATISFIED OF RECORD AND NO APPEAL HAS BEEN TAKEN THEREFROM.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of October 10, 2008



(SIGNATURE OF CLERK OR PROTHONOTARY
OF THE COUNTY COURT)

WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2010 (TYPE OR PRINT NAME)
Clearfield Co., Clearfield, PA

SEAL
M 11/50/08
OCT 10 2008 Copy to Bureau
of Drivers Licensing
6/11
William A. Shaw

Prothonotary/Clerk of Courts
RETURN COMPLETED Bureau of Driver Licensing, P.O. Box 60037,
FORM TO: Harrisburg, Pennsylvania 17106-0037

Erie Exchange

Case # 2007-19-CD

VS

Brian M. Peterson

Change of Address

Brian Peterson

NEW ADDRESS

103 DOCTORS LANE
PENFIELD NY 13849

Filed by Brian Peterson

FILED
01:45pm GK
JUN 09 2011
S NO CC
William A. Shaw
Prothonotary/Clerk of Courts
(610)

PAUL F. D'EMILIO, ESQUIRE
ATTORNEY I.D. #16654
905 W. SPROUL ROAD, SUITE 105
SPRINGFIELD, PA 19064
(610) 338-0338

THIS IS AN ARBITRATION MATTER

ATTORNEY FOR PLAINTIFF

ERIE INSURANCE EXCHANGE
AS SUBROGEE OF KENT'S AUTO SERVICE
AND KENT HERSHBER
4901 LOUISE DRIVE
MECHANICSBURG, PA 17055

COMMON PLEAS COURT OF
CLEARFIELD COUNTY

VS.

NO. 07-19-CD

BRIAN M. PETERSON
741 BROAD STREET
BROCKWAY, PA 15824

CIVIL ACTION

PRAECIPE TO SATISFY THE JUDGMENT

TO THE PROTHONOTARY, P.C.:

Satisfy the judgment in the above-entitled matter upon payment of your costs only.


Paul F. D'Emilio, Esquire
Attorney for Plaintiff

FILED
m 1:35P.M. Oct
OCT 15 2013
S William A. Shaw
Prothonotary/Clerk of Courts

cc Atty D'Emilio
Atty paid 7.00
6V