

07-857-CD
McLean Publishing vs Asim Rahman et al

McLean Publishing et al vs Asim Rahman et
2007-857-CD

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

McLEAN PUBLISHING COMPANY,
PRONTOCK BEER DISTRIBUTOR,
INC., and WESLEY BEACH, d/b/a
SYSTEMS REFRIGERATION CO.,
Plaintiffs

vs.

ASIM RAHMAN, individually and
d/b/a 21 TRIANGULAR, INC., and
21 TRIANGULAR, INC.,
Defendants

CIVIL ACTION - AT LAW

No. 2007- 857- C0

Type of Pleading:
COMPLAINT

Filed on Behalf of:
Plaintiff

Counsel of Record for This
Party:

Matthew B. Taladay, Esq.
Supreme Court No. 49663
Hanak, Guido and Taladay
3 S. Brady Street, Suite 300
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

Dated: June 1, 2007

FILED

JUN 04 2007

M/9:00/

William A. Shaw
Prothonotary/Clerk of Courts

2 CERT TO SHAW

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

McLEAN PUBLISHING COMPANY,	:	
PRONTOCK BEER DISTRIBUTOR,	:	
INC.,and WESLEY BEACH, d/b/a	:	
SYSTEMS REFRIGERATION CO.,	:	
Plaintiffs	:	
	:	
vs.	:	No.
	:	
ASIM RAHMAN, individually and	:	
d/b/a 21 TRIANGULAR, INC., and	:	
21 TRIANGULAR, INC.,	:	
Defendants	:	

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 defense or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without further notice for any money claimed 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.

Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641 Ext. 1303

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

McLEAN PUBLISHING COMPANY, :
PRONTOCK BEER DISTRIBUTOR, :
INC., and WESLEY BEACH, d/b/a :
SYSTEMS REFRIGERATION CO., :
Plaintiffs :
vs. : No.
ASIM RAHMAN, individually and :
d/b/a 21 TRIANGULAR, INC., and :
21 TRIANGULAR, INC., :
Defendants :

COMPLAINT

AND NOW, come the Plaintiffs by their attorneys, Hanak,
Guido and Taladay, and hereby bring the within Complaint against the
Defendants averring as follows:

1. Plaintiff McLean Publishing Company is a business corporation with office and place of business at 500 Jeffers Street, P.O. Box 407, DuBois, Clearfield County, Pennsylvania 15801.
2. Plaintiff Prontock Beer Distributor, Inc. is a Pennsylvania business corporation with office and place of business at 323 Sandy Street, DuBois, Clearfield County, Pennsylvania 15801.
3. Plaintiff Wesley Beach is an adult individual who does business as Systems Refrigeration Co., with an address and place of business at 251 Sandy Street, DuBois, Clearfield County, Pennsylvania 15801.

4. Defendant Asim Rahman is an adult individual who trades or does business as 21 Triangular, Inc. whose last known address is 460 State Street, Apartment 1, Curwensville, Clearfield County, Pennsylvania 16833.

5. Defendant 21 Triangular, Inc. is a foreign business corporation registered to do business within the Commonwealth of Pennsylvania at Entity No. 3311834. The registered Pennsylvania business address of 21 Triangular, Inc. is 460 State Street, Apartment 1, Curwensville, Clearfield County, Pennsylvania 16833.

6. At all times relevant hereto, the Defendants Asim Rahman, d/b/a 21 Triangular, Inc., and 21 Triangular, Inc. operated businesses known as UniMart No. 04003, UniMart No. 04009, and UniMart No. 04076.

7. At all times relevant hereto, the Plaintiffs above named provided goods and/or services to the Defendants as set forth below.

8. After repeated demands, Defendant has failed to pay for goods and services provided.

Count I

McLean Publishing Company

vs.

Asim Rahman, individually and d/b/a 21 Triangular, Inc. and 21 Triangular, Inc.

9. On days and dates set forth on Exhibit "A" hereto Plaintiff McLean Publishing Company at the requests and for the benefit of Defendant did provide publishing services as enumerated on Exhibit "A" hereto.

10. Plaintiff McLean Publishing Company billed the Defendants for these services in the amount of \$2,507.53 which represents the fair and reasonable value of the services provided.

11. Despite repeated requests, Defendant has failed and refused to pay monies due and owing.

WHEREFORE, Plaintiff McLean Publishing Company demands judgment against Defendants in the amount of \$2,507.53 plus interest and costs of suit.

Count II

Prontock Beer Distributor, Inc.

vs.

Asim Rahman, individually and d/b/a 21 Triangular, Inc. and 21 Triangular, Inc.

12. At all times relevant hereto, Plaintiff Prontock Beer Distributor, Inc. was a wholesale distributor of non-alcohol beverage products.

13. On various dates set forth on Exhibit "B" hereto, Plaintiff Prontock Beer Distributor, Inc. provided Defendants at is various

UniMart locations with beverage products as more fully set forth in Exhibit "B" hereto.

14. Defendants, after repeated requests, have failed or refused to pay an outstanding balance of \$3,284.70 for these products, which represent the agreed upon and fair and reasonable value of the products.

WHEREFORE, Plaintiff Prontock Beer Distributor, Inc. demands judgment against the Defendants jointly and severally in the amount of \$3,284.70, plus interest and costs of suit.

Count III

Wesley Beach, d/b/a Systems Refrigeration Co.

vs.

Asim Rahman, individually and d/b/a 21 Triangular, Inc. and 21 Triangular, Inc.

15. At all times relevant hereto, Defendants Asim Rahman and 21 Triangular, Inc. operated a UniMart store located at 208 Filbert Street, Curwensville, Pennsylvania 16833.

16. At various dates between December 31, 2005 and July 14, 2006, Systems Refrigeration Co. provided material and labor to Defendants at the UniMart store located in Curwensville, Pennsylvania, which are more fully set forth on Exhibit "C " attached hereto.

17. Despite repeated requests, the Defendants has failed or refused to make payment of monies due and owing in the amount of

\$959.86, which represents the reasonable charge for material and services provided.

18. Defendants at all times relevant hereto operated and managed a UniMart store located at P.O. Box 273, Hyde, Pennsylvania.

19. At various times and dates between July 12, 2006 and September 13, 2006, Plaintiff provided material and labor to Defendant at the Hyde, Pennsylvania, location with a total value of \$766.11 as more fully described in Exhibit "D" attached hereto.

20. Despite repeated demands, Defendants have failed or refused to pay monies due and owing in the amount of \$766.11.

21. At all times relevant hereto, Defendants operated a UniMart store at State Street and Filbert Street in Curwensville, Pennsylvania.

22. Between June 26, 2006 and July 21, 2006, Plaintiff provided material and labor to Defendants at this location with a reasonable value of \$1,140.07 as set forth in Exhibit "E" attached hereto.

23. Despite repeated requests, Defendants have failed or refused to make payment of monies due and owing to Plaintiff in the amount of \$1,140.07.

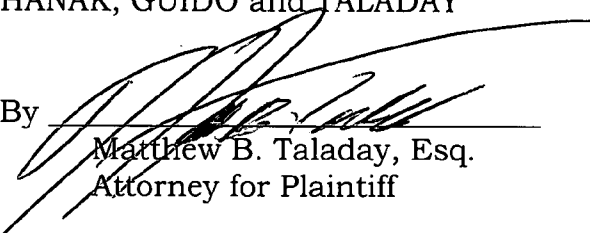
WHEREFORE, Plaintiff Wesley Beach, d/b/a Systems Refrigeration Co., demands judgment in his favor and against Defendants jointly and severally in the amount of \$2,866.04, plus interest and costs of suit.

WHEREFORE, Plaintiff demands judgment not in excess of
the arbitration limits of this Court.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By



Matthew B. Taladay, Esq.
Attorney for Plaintiff

Uni Mart Stores owned and operated by Asim

Account #0562, Johnsonburg Uni-Mart, Store #4035 135 West Center Street,
Johnsonburg Pa., 15845

Account start date – 7/21/2005 stop date – 12/29/2006

Current unpaid balance \$599.08

Account #0682, Curwensville Uni-Mart, Store #4076, 405 State & Filbert Streets,
Curwensville Pa., 16833

Account start date – 5/9/2005 Stop date – 12/28/2006

Current unpaid balance \$287.19

Account #0683, Curwensville Uni-Mart, Store #4009, 208 Filbert Street, Curwensville
Pa., 16833

Account start date – 5/9/2005 stop date – 12/28/2006

Current unpaid balance \$1505.26

Account #0684, Hyde Uni-Mart, Store #4003, 1703 Washington Avenue, Hyde Pa.,
16843

Account start date – 5/9/2005 stop date – 12/28/06

Current unpaid balance \$116.00

Total unpaid balance \$2507.53

Prontock Beer Distributor Inc.

323 Sandy St. DuBois, PA 15801 • Phone 814-371-6910 • FAX 814-375-0725
Email – tprontock323@verizon.net

January 26, 2007

Asim Rahman
Dba 21 Triangular, Inc
460 State Street, Apt 1
Curwensville, PA 16833

21 Triangular, Inc
65 East 99th Street , #96
New York, NY 10029

Dear Mr. Rahman:

Please be aware that I have made several personal telephone contacts with you concerning an outstanding balance of \$3284.70 for non-alcohol products sold to Uni-Mart #04003, Uni-Mart #04009 and Uni-Mart #04076. The amounts are listed below:

Uni-Mart #04003	\$1023.95
Uni-Mart #04009	1044.27
Uni-Mart #04076	1216.48

As of this date, I have received no response from you. Consider this letter as written notification that if the amount owed is not paid in full by February 14, 2007, measures will be taken to attain restitution. All costs for these legal actions will be at your expense. After this date an additional 10% finance charge will be added to your outstanding balance.

Sincerely,

Thomas A. Prontock
Prontock Beer Distributors, Inc.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
208 Filber Street
Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$959.86	

DATE	TRANSACTION	AMOUNT	BALANCE		
12/31/2005 07/12/2006	Balance forward INV #9589. Due 07/12/2006. A/C Leaking --- A/C Leaking --- Installed 4 new filters, charged unit above register. --- filter \$6.40 --- R-22, 4 @ \$6.06 = 24.24 --- Service \$120.00 --- Curwensville \$30.00 --- --- Evaporator pan froze up, overflowing, filter plugged up, took out and shut down overnight. --- filter \$1.60 --- Service \$150.00 --- Curwensville \$30.00 --- --- Filter drier is very oily but no refrigerant leak at this time.	362.24	0.00 362.24		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
25.00	0.00	50.00	25.00	859.86	\$959.86

We are now adding finance charges to all late invoices.
Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
208 Filber Street
Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$959.86	

DATE	TRANSACTION				AMOUNT	BALANCE
07/14/2006	INV #9625. Due 07/14/2006. Hot dog roller grill not working. --- Hot dog roller grill not working. --- Small freezer needs looked at. --- Need to order new motor for hot dog roller grill. --- Cleaned condenser on small freezer and installed new evaporator motor. --- motor \$48.00 --- Service \$75.00 --- Curwensville \$40.00 --- --- Installed new motor on hot dog roller grill. --- Misc. \$144.62 --- Service \$100.00 --- Curwensville \$40.00				447.62	809.86
09/13/2006	INV #FC 2027. Due 09/13/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	834.86
11/06/2006	INV #FC 2048. Due 11/06/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	859.86
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE	
25.00	0.00	50.00	25.00	859.86	\$959.86	

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Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
208 Filber Street
Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$959.86	

DATE	TRANSACTION				AMOUNT	BALANCE
12/31/2006	INV #FC 2052. Due 12/31/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	884.86
01/31/2007	INV #FC 2055. Due 01/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	909.86
02/28/2007	INV #FC 2058. Due 02/28/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	934.86
03/31/2007	INV #FC 2061. Due 03/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9589 for 362.24 on 07/12/2006 --- Invoice #9625 for 447.62 on 07/14/2006				25.00	959.86
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE	
25.00	0.00	50.00	25.00	859.86	\$959.86	

We are now adding finance charges to all late invoices.
Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
P.O. Box 273
Hyde, PA 16843

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$766.11	

DATE	TRANSACTION	AMOUNT	BALANCE		
12/31/2005	Balance forward		0.00		
07/12/2006	INV #9584. Due 07/12/2006. Roof top AC is making bad noise. --- Roof top AC is making bad noise. --- Troubleshoot, needs new condenser fan motor and blade. --- Service \$120.00 --- Clearfield \$30.00 --- --- Installed new condenser motor and blade. --- Misc. \$39.70 --- Misc. \$7.65 --- Misc. \$108.76 --- Service \$180.00 --- Clearfield \$30.00	516.11	516.11		
08/08/2006	INV #9749. Due 08/08/2006. A/C needs looked at. --- A/C needs looked at. --- Thermostat was not turned down enough and unit was not reaching temp. --- Service \$50.00 --- Clear Wal \$50.00	100.00	616.11		
09/13/2006	INV #FC 2028. Due 09/13/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	641.11		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
25.00	0.00	50.00	25.00	666.11	\$766.11

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Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart

P.O. Box 273

Hyde, PA 16843

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$766.11	

DATE	TRANSACTION	AMOUNT	BALANCE		
11/06/2006	INV #FC 2049. Due 11/06/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	666.11		
12/31/2006	INV #FC 2053. Due 12/31/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	691.11		
01/31/2007	INV #FC 2056. Due 01/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	716.11		
02/28/2007	INV #FC 2059. Due 02/28/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	741.11		
03/31/2007	INV #FC 2062. Due 03/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9584 for 516.11 on 07/12/2006 --- Invoice #9749 for 100.00 on 08/08/2006	25.00	766.11		
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
25.00	0.00	50.00	25.00	666.11	\$766.11

We are now adding finance charges to all late invoices.
Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
State St. and Filbert St.
Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$1,140.07	

DATE	TRANSACTION			AMOUNT	BALANCE
12/31/2005	Balance forward				0.00
06/26/2006	INV #9512. Due 06/26/2006. Walk In Cooler --- Walk In Cooler, Low on refrigerant, charged, leak searched found 2 leaks on TXV in 2nd evaporator, tightened flare nuts. --- R-414B, 11 @ \$14.37 = 158.07 --- Service \$120.00 --- Curwensville \$40.00			318.07	318.07
07/14/2006	INV #9624. Due 07/14/2006. Bagged Ice Machine evaporator fan not working. --- Bagged Ice Machine evaporator fan not working. --- Installed new evaporator fan motor. --- 65670 \$38.10 --- Service \$100.00 --- Curwensville \$40.00			178.10	496.17
07/21/2006	INV #9643. Due 07/21/2006. Cooler leaking water. --- Cooler leaking water. --- Froze up, changed defrost timer and contactor, defrosted. --- defrost \$197.00 --- contactor \$40.00 --- Service \$210.00 --- Curwensville \$40.00			487.00	983.17
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
25.00	0.00	50.00	25.00	1,040.07	\$1,140.07

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Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart
State St. and Filbert St.
Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$1,140.07	

DATE	TRANSACTION				AMOUNT	BALANCE
09/13/2006	INV #FC 2029. Due 09/13/2006. Finance Charge --- Fin Chg \$30.72 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				30.72	1,013.89
11/06/2006	INV #FC 2050. Due 11/06/2006. Finance Charge --- Fin Chg \$26.18 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				26.18	1,040.07
12/31/2006	INV #FC 2054. Due 12/31/2006. Finance Charge --- Fin Chg \$25.00 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				25.00	1,065.07
01/31/2007	INV #FC 2057. Due 01/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				25.00	1,090.07
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE	
25.00	0.00	50.00	25.00	1,040.07	\$1,140.07	

We are now adding finance charges to all late invoices.
Finance charges are non-negotiable.



Systems Refrigeration Co.

251 Sandy Street, DuBois, PA 15801

Phone: 814-371-9490

Fax: 814-372-4768

Email: systems1@adelphia.net

Statement

DATE

4/13/2007

TO:

Uni-Mart

State St. and Filbert St.

Curwensville, PA 16833

Highlighted invoices...	AMOUNT DUE	Please make prompt...
	\$1,140.07	

DATE	TRANSACTION				AMOUNT	BALANCE
02/28/2007	INV #FC 2060. Due 02/28/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				25.00	1,115.07
03/31/2007	INV #FC 2063. Due 03/31/2007. Finance Charge --- Fin Chg \$25.00 --- Invoice #9512 for 318.07 on 06/26/2006 --- Invoice #9624 for 178.10 on 07/14/2006 --- Invoice #9643 for 487.00 on 07/21/2006				25.00	1,140.07
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE	
25.00	0.00	50.00	25.00	1,040.07	\$1,140.07	

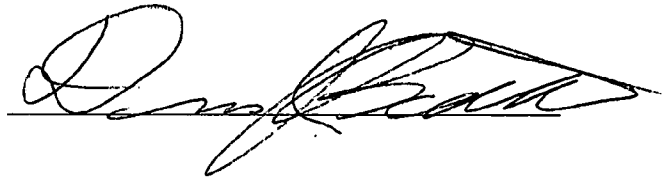
We are now adding finance charges to all late invoices.
Finance charges are non-negotiable.

VERIFICATION

I, Dennis J. Bonavita, Publisher of
McLEAN PUBLICATION COMPANY, do hereby verify that I have read the
foregoing Complaint. The statements therein are correct to the best of
my personal knowledge or information and belief.

This statement and verification are made subject to the
penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to
authorities, which provides that if I make knowingly false averments
I may be subject to criminal penalties.

Date: 5-25-07

A handwritten signature in black ink, appearing to read "Dennis J. Bonavita", written over a horizontal line.

VERIFICATION

I, Thomas A. Prontock, President of PRONTOCK BEER DISTRIBUTOR, INC., do hereby verify that I have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date:

5/25/07

Thomas Prontock

VERIFICATION

I, Wesley Beach, Owner of SYSTEMS REFRIGERATION CO., do hereby verify that I have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Date: 5/29/07

Wesley A. Beach
Wesley Beach

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket # **102863**

McLEAN PUBLISHING COMPANY, PRONTOCK BEER DISTRIBUTOR INC al

Case # 07-857-CD

VS.

ASIM RAHMAN, individually & d/b/a 21 TRIANGULAR, INC. and 21
TRIANGULAR, INC.

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW June 12, 2007 RETURNED THE WITHIN COMPLAINT "NOT SERVED" AS TO ASIM RAHMAN, IND & D/B/A
21 TRIANGULAR, INC., DEFENDANT. COMPLAINT GIVEN BACK TO ATTORNEY'S OFFICE

SERVED BY: /

FILED
JUN 12 2007
LST

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # **102863**

McLEAN PUBLISHING COMPANY, PRONTOCK BEER DISTRIBUTOR INC al

Case # 07-857-CD

vs.

ASIM RAHMAN, individually & d/b/a 21 TRIANGULAR, INC. and 21
TRIANGULAR, INC.

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW June 12, 2007 RETURNED THE WITHIN COMPLAINT "NOT SERVED" AS TO 21 TRIANGULAR, INC.,
DEFENDANT. COMPLAINT GIVEN BACK TO ATTORNEY'S OFFICE

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102863
NO: 07-857-CD
SERVICES 2
COMPLAINT

PLAINTIFF: McLEAN PUBLISHING COMPANY, PRONTOCK BEER DISTRIBUTOR INC al
vs.
DEFENDANT: ASIM RAHMAN, individually & d/b/a 21 TRIANGULAR, INC. and 21 TRIANGULAR, INC.

SHERIFF RETURN

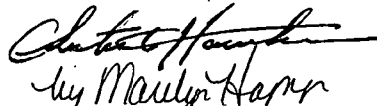
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	HANAK	15892	20.00
SHERIFF HAWKINS	HANAK	15892	31.05

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

FILED^E
JUL 19 2013
WILLIAM A. SHAW
Prothonotary/Clerk of Courts
no C/L
Cham. - TC
Att

McLEAN PUBLISHING COMPANY,
PRONTOCK BEER DISTRIBUTOR,
INC., and WESLEY BEACH, d/b/a
SYSTEMS REFRIGERATION CO.,

Plaintiffs

vs.

ASIM RAHMAN, individually and
d/b/a 21 TRIANGULAR, INC., and
21 TRIANGULAR, INC.,

Defendants

CIVIL ACTION - AT LAW

No. 07-857-CD

Type of Pleading:
Praecipe for
Discontinuance

Filed on Behalf of:
Plaintiffs

Counsel of Record for This
Party:

Matthew B. Taladay, Esq.
Supreme Court No. 49663
Hanak, Guido and Taladay
3 S. Brady Street, Suite 300
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

Dated: July 18, 2013

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

McLEAN PUBLISHING COMPANY, :
PRONTOCK BEER DISTRIBUTOR, :
INC.,and WESLEY BEACH, d/b/a :
SYSTEMS REFRIGERATION CO., :
Plaintiffs :

vs.

No. 07-857-CD

ASIM RAHMAN, individually and :
d/b/a 21 TRIANGULAR, INC., and :
21 TRIANGULAR, INC., :
Defendants :

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Kindly mark the above referenced case ended, settled and
discontinued.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By /s/ Matthew B Taladay
Matthew B. Taladay, Esq.
Counsel for Plaintiffs

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

CIVIL DIVISION

**McLean Publishing Company
Prontock Beer Distributor, Inc.
Wesley Beach
Systems Refrigeration Co.**

Vs.

No. 2007-00857-CD

**Asim Rahman
21 Triangular, Inc.**

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on July 19, 2013, marked:

Ended, Settled and Discontinued

Record costs in the sum of \$85.00 have been paid in full by Hanak, Guido and Taladay.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 19th day of July A.D. 2013.

William A. Shaw, Prothonotary