

07-941-CD
Hannah Wallace et al vs I. Wilkinson

Hannah Wallace et al vs Irene Wilkinson
2007-941-CD

Date: 1/5/2012

Clearfield County Court of Common Pleas

User: LMILLER

Time: 09:35 AM

ROA Report

Page 1 of 6

Case: 2007-00941-CD

Current Judge: Fredric Joseph Ammerman

Hannah Wallace, et alvs.Irene J. Wilkinson

CIVIL ACTION

Date		Judge
6/14/2007	New Case Filed.	No Judge
	Filing: Overage Paid by: Lundy, Jeffrey (attorney for Wallace, Hannah) Receipt number: 1919382 Dated: 06/14/2007 Amount: \$10.00 (Check)	No Judge
	X Filing: Praecipe for Writ of Summons Paid by: Lundy, Jeffrey (attorney for Wallace, Hannah) Receipt number: 1919382 Dated: 06/14/2007 Amount: \$85.00 (Check) 1CC & 1 writ to shff.	No Judge
	Case Filed.	No Judge
8/10/2007	X Praecipe For Entry of Appearance, filed by Atty. Troy J. Harper, no cert. copies. Enter appearance on behalf of Defendant.	No Judge
	X Praecipe to Enter Rule to File Complaint within 20 days after date of service issued. Rule Dated: August 10, 2007, filed by Atty. Harper 1 Cert. to Atty.	No Judge
8/27/2007	X Certificate of Service, filed. Served a Rule to File Complaint issued by the Prothonotary of Clearfield County, Pennsylvania, upon the Plaintiffs in the above captioned matter by sending the same to their attorney, Jeffrey Lundy Esq. on the 24th day of August 2007, filed by s/ Troy J. Harper Esq. No CC.	No Judge
9/6/2007	X Certificate of Service, filed. Served a Complaint upon the defendant in the above captioned matter to Troy J. Harper on the 5th day of September 2007, filed by s/ Jeffrey Lundy Esq. 2CC Atty Lundy.	No Judge
	X Complaint, filed by s/ Jeffrey Lundy. 3CC Atty. Lundy	No Judge
9/11/2007	X Demand For Jury Trial, filed by s/ Jeffrey Lundy, Esquire. 2CC Atty. Lundy	No Judge
10/29/2007	X Sheriff Return, July 2, 2007 at 2:38 pm Served the within Praecipe & Summons on Irene J. Wilkinson by handing to Irene J. Wilkinson. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm Shff Hawkins costs pd by Lukehart \$36.17	No Judge
3/31/2008	X Certificate of Service, filed. That an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff, Thomas Wallace, and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff, Thomas Wallace, were served on the 28th day of March 2008 by first class mail to Jeffrey Lundy Esq., filed by s/ Troy J. Harper Esq. NO CC.	No Judge
	X Certificate of Service, filed. That an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff, Hannah Wallace, and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff, Hannah Wallace were served on the 28th day of March 2008 by first class mail to Jeffrey Lundy Esq., filed by s/ Troy J. Harper Esq. NO CC.	No Judge
4/8/2008	X Answer and New Matter, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
4/15/2008	X Answer to New Matter, filed by s/ Jeffrey Lundy, Esquire. 3CC Atty. Lundy	No Judge
5/16/2008	X Certificate of Service, an original and one copy of Defendant's Answers and Objections to Interrogatories and an original and one copy of Defendant's Responses to Request for Production of Documents served upon Plaintiffs by sending the same to their attorney, Jeffrey Lundy, Esquire, by regular mail on the 15th day of May, 2008. Filed by s/ Troy Harper, Esquire. No CC	No Judge

be limited to, Pennsylvania Blue Shield, the federal Medicare program, the Pennsylvania Medical Assistance program and such other health maintenance organizations, preferred provider organizations, or private health insurance programs as the Hospital shall direct. The Physician may not terminate his participation in any third-party reimbursement program or change or terminate any assignment of benefits or payments from such programs to the Hospital without the express written consent of the Hospital.

- (c) The Physician may not become a participating provider in any third-party reimbursement program (other than the ones specifically referred to above) or individual practice association, physician hospital organization or any other provider network or organization without the express written consent of the Hospital.
- (d) Under no circumstances shall the Physician bill any patient or any public or private third-party reimbursement program for any services for which the Physician has been compensated pursuant to this Agreement. Any violation of any provision of this Section by the Physician shall permit the Hospital, at its option, to terminate this Agreement immediately.

Section 9. Medical Records

Every practitioner on the Medical Staff of Clearfield Hospital is responsible for completion of all of his/her medical record documentation prior to leaving the Medical Staff with exclusion of an emergency situation. Failure to do so is considered a direct violation of the Medical Staff Bylaws of Clearfield Hospital, which is reportable to the National Data Bank.

Section 10. Information and Records

The Physician shall not disclose information relating to the operations of the Hospital or its affiliates to persons other than the board or management of the Hospital or such governmental or private accreditation or licensing bodies or third-party reimbursement programs with whom the Hospital has directed or authorized the Physician to deal, unless the Hospital shall have given written consent for the release of information. The above shall be

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ROA Report

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Case: 2007-00941-CD

Current Judge: Fredric Joseph Ammerman

Hannah Wallace, et alvs.Irene J. Wilkinson

CIVIL ACTION

Date		Judge
1/12/2009	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Records Custodian-DRMC Primary Care Associates)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Records Custodian-Tri-State Neurosurgical Associates)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Records Custodian-Summit Rehabilitation)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s. Troy J. Harper Esq. No CC. (In Re: Records Custodian-DMRC Neurology)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Recods Custodian-DuBois Regional Medical Center)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Dr. P. J. Valigorsky, DRMC West Unit)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Haper Esq. No CC. (In Re: Recods Custodian-DuBois Regional Medical Center, Outpatient Physical Therapy)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Recods Custodian, UPMC Headache Center)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Haper Esq. Dr. Ronald Statler)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Recods Custodian-Advanced Chiropractic)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Records Custodian-DuBois Regional Medical Center)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Recods Custodian-Advanced Chiropractic)	No Judge

The breakdown of visit thresholds and the amount of the bonus related to each category is as follows:

- i. If the average number of visits per month were between 200-249, the bonus paid to the Physician would be \$31,250.
- ii. If the average number of visits per month were between 250-299, the bonus paid to the Physician would be \$62,500.
- iii. If the average number of visits per month were between 300-374, the bonus paid to the Physician would be \$93,750.
- iv. If the average number of visits per month were between 375-424, the bonus paid to the Physician would be \$125,000.
- v. If the average number of visits per month were between 425-474, the bonus paid to the Physician would be \$150,000.
- vi. If the average number of visits per month exceeds 475, the bonus paid to the Physician would be \$175,000.

Section 7. Benefits

The Physician shall be entitled to employee benefits as outlined in Attachment A to this Agreement. Benefits and Employee's cost of benefits will be explained by the Human Resources Department.

Section 8. Third-Party Reimbursement Programs and Assignment Agreements

- (a) The Physician shall assign to the Hospital or its designees all rights they may now or hereafter possess to receive income, payment and/or reimbursement for any and all professional medical services rendered by him to patients at the Hospital while this Agreement is in effect.
- (b) The Physician shall execute such documents as may be necessary, desirable or requested by the Hospital (1) to effectuate said assignment with respect to public and private third-party reimbursement programs, and (2) to become a participating provider in third-party reimbursement programs. As used in this Agreement, the term "third-party reimbursement program" shall include, but not

CIVIL ACTION

Date		Judge
1/12/2009	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (In Re: Records Custodian, DRMC Neurology)	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, filed by s/ Troy J. Harper Esq. No CC. (Dr. Nathaniel Cole)	No Judge
1/29/2009	X Notice of Deposition of Plaintiff, Hannah Wallace, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of Plaintiff, Thomas Wallace, filed by s/ Troy J. Harper, Esquire. no CC	No Judge
2/2/2009	X Notice of Deposition of the Records Custodian of DRMC Primary Care Associates For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of DRMC Neurology For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of Summit Rehabilitation For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of Dr. P.J. Valiforsky For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of Tri-State Neurosurgical Associates For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of DuBois Regional Medical Center For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of DuBois Regional Medical Center For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of Advanced Chiropractic For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of DuBois Regional Medical Center - Outpatient Physical Therapy For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of UPMC Headache Center For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of Advanced Chiropractic For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of the Records Custodian of DuBois Regional Medical Center For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge

- (f) The Physician shall make himself available for call ten days during any given month.
- (g) In all matters related to the discharge responsibilities under the term of this Agreement, the Physician shall be responsible to the President of the Hospital or the President's designee.

Section 4. Facilities and Personnel

The Hospital shall furnish the Physician with office space, equipment and personnel as the Hospital deems to be reasonably necessary for the performance of the Physician's duties hereunder. Billing for professional services rendered by the Physician for services defined in this Agreement shall be the responsibility of the Hospital.

Section 5. Professional Liability Insurance

The Hospital will provide professional liability insurance with tail coverage for the Physician in such minimum amounts as may be required by law or in such higher amounts as may be deemed necessary or desirable by the Hospital.

Section 6. Compensation will be replaced in its entirety as follows:

- (a.) Effective January 1, 2006, for all services rendered by the Physician as an Employee of the Hospital, the Hospital as the Employer shall pay the Physician a salary of Four Hundred Thirty Thousand Dollars (\$430,000.) per annum, in accordance with general payroll policies of the Hospital. Effective January 1, 2007, the Physician shall receive an annual salary of Four Hundred Forty Thousand Dollars, (\$440,000.), and effective January 1, 2008, the Physician shall receive an annual salary of Four Hundred Fifty Thousand Dollars, (\$450,000.). Additionally the Physician Shall receive an amount of \$1,500 per month for duties performed as the Medical Director of the Hospice Program.
- (b.) Bonus: The Hospital will pay to the Physician a bonus of up to One Hundred Seventy Five Thousand Dollars (\$175,000) each year that the number of visits exceeds certain average monthly thresholds. The bonus will be paid within 30 days of the end of the contract year. A detailed listing of monthly visits will be provided to the Physician.

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Case: 2007-00941-CD

Hannah Wallace, et alvs.Irene J. Wilkinson

Date		Judge
2/2/2009	X Notice of Deposition of the Records Custodian of DRMC Neurology For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of Dr. Ronald Statler For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Notice of Deposition of Dr. Nathaniel Cole For the Purpose of Copying Records Only, filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, UPMC Headache Center. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Dr. Nathaniel Cole. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DRMC Primary Care Associates. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, Tri-State Neurosurgical Associates. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DRMC Neurology. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, Summit Rehabilitation. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Dr. P. J. Valigorsky. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DuBois Regional Medical Center. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DuBois Retional Medical Center, Outpatient Physical Therapy. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, Advanced Chiropractic. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Dr. Ronald Statler. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, Advanced Chiropractic. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DuBois Regional Medical Center. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, to Records Custodian, DRMC Neurology. Filed by s/ Troy J. Harper, Esquire. No CC	No Judge

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

ASHLEY NOELLE MAUTHE,
Plaintiff

vs.

ALAN MICHAEL MARTIN,
Defendant

No. 08-519-CD

Type of Case: Custody Action

Type of Pleading: Complaint in
Custody

Filed on behalf of: Ashley Noelle
Mauthe,
Plaintiff

Counsel of Record for this Party:

BLAISE J. FERRARACCIO, ESQUIRE
FERRARACCIO & NOBLE
Attorneys and Counselors at Law
Supreme Court I.D. No.47753

301 East Pine Street
Clearfield, PA 16830
(814) 765-4990
FAX (814) 765-9377

One Child:

Maggie Mae Mauthe – Age 2 months
Date of Birth: February 1, 2008

BLAISE J. FERRARACCIO
ATTORNEY & COUNSELOR
AT LAW

Original upstairs

FILED
01/20/08
MAR 20 2008
Any pd. \$100.00
7CC Any Ferraraccio

William A. Shaw
Prothonotary/Clerk of Courts

Date: 1/5/2012

Clearfield County Court of Common Pleas

User: LMILLER

Time: 09:35 AM

ROA Report

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Case: 2007-00941-CD

Current Judge: Fredric Joseph Ammerman

Hannah Wallace, et alvs.Irene J. Wilkinson

CIVIL ACTION

Date		Judge
5/29/2009	X Revised Notice of Deposition of Plaintiff, Hannah Wallace, filed by s/ Troy J. Harper, Esquire. no CC	No Judge
	X Revised Notice of deposition of Plaintiff, Sharon Wallace, filed by s/ Troy J. Harper, Esquire. no CC	No Judge
	X Revised Notice of Deposition of Plaintiff, Thomas Wallace, filed by s/ Troy J. Harper, Esquire. no CC	No Judge
9/23/2010	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE: Tri State. filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE:Jeremy Brubaker, filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE: P& G, filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE: DRMC Primary, filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE: DuBois Magnetic, filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 RE: DuBois Regional Medical Center- Outpatient, filed by Atty. Harper no cc	No Judge
	X Notice of Intent to Serve Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 Re: DuBois Regional Medical Center-Imaging Department, filed by s/ Troy J. Harper Esq. No CC.	No Judge
9/30/2010	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Certificate Prerequisite to Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge

Section 12. Assignment

This Agreement and the Physician's rights and obligations hereunder may not be assigned by the Physician without the express written consent of the Hospital.

Section 13. Modification

This Agreement may not be orally canceled, changed, modified or amended, and no cancellation, change, modification or amendment shall be effective or binding, unless it is in writing and signed by both parties to this Agreement.

Section 14. Termination

- (a) Notwithstanding any of the provisions of this Agreement, the Hospital or Physician may terminate this Agreement at any time for any reason upon ninety (90) days written notice. The Hospital may, in its sole discretion, elect to give the Physician pay in lieu of notice.
- (b) The Hospital may also terminate the Physician's employment immediately in the event the Physician has been formally indicted or charged with any criminal violation involving violent crimes or any crimes relating to the practice of medicine, including, but not limited to, Medicare or Medicaid fraud or abuse or controlled substance violations. The Hospital may also terminate this Agreement immediately if the Physician's participation in the Medicare, Medicaid or any other Federal Health Program is terminated or if the Physician is otherwise precluded or excluded from participation in either of those programs. In such cases, the Hospital, in its sole discretion may elect in the alternative to indefinitely suspend the Physician from his contractual duties, without pay (which shall also result in suspension of the Physician's clinical privileges at the Hospital), pending resolution of the charges satisfactory to the Hospital.

Section 15. Non-Competition

Notwithstanding any other provision of this contract, for a period of one year after the expiration or termination of this Agreement the Physician shall not enter into a contract with or otherwise provide services to any health maintenance organization, preferred provider

Date: 1/5/2012

Clearfield County Court of Common Pleas

User: LMILLER

Time: 09:35 AM

ROA Report

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Case: 2007-00941-CD

Current Judge: Fredric Joseph Ammerman

Hannah Wallace, et alvs.Irene J. Wilkinson

CIVIL ACTION

Date		Judge
9/30/2010	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
	X Notice of Deposition for the Purpose of Copying Records Only, filed by s/Troy J. Harper, Esq. No CC	No Judge
12/5/2011	X Petition to Settle Minors Claim, filed by s/ Jeffrey Lundy, Esq. 2CC Atty. Lundy	No Judge
12/7/2011	X Scheduling Order, this 7th day of December 2011, it hereby ORDERED that a hearing for Petition to Settle Minor's Claim is hereby scheduled for January 13, 2012 at 1:30 pm. BY THE COURT: /s/ Fredric J. Ammerman, P. Judge. 2CC Atty Lundy.	Fredric Joseph Ammerman

deemed to include patients' records and all other information kept in the normal operation of the Hospital. Patient and other records connected with services provided by the Physician at the facility pursuant to this Agreement are and shall remain the property of the Hospital.

Section 11. Medical Staff Appointment and Clinical Privileges

- (a) The Physician shall maintain medical staff appointment and clinical privileges at Clearfield Hospital commensurate with the services that shall be performed pursuant to this Agreement. Application for the same shall be processed pursuant to the applicable bylaws and policies of the Hospital and its medical staff.
- (b) Said medical staff appointment and clinical privileges shall be incident to and coterminous with this Agreement and, upon the termination of this Agreement prior to its expiration date, shall automatically terminate, unless this provision is waived in writing by the Hospital. Similarly, upon the termination for any reason of said medical staff appointment and clinical privileges, this Agreement and the Physician's employment hereunder shall terminate immediately. Any rights that the Physician may have to any hearing or appeal procedures prior to termination of medical staff appointment or clinical privileges, pursuant to the bylaws or policies of the Hospital or its medical staff, the Health Care Quality Improvement Act of 1986, or any other state or federal statute, regulation or judicial decision are hereby waived with respect to any suspension or termination of medical staff appointment or clinical privileges at the Hospital resulting from the termination of this Agreement or suspension of contractual duties pursuant to this Agreement.
- (c) In the event of any conflict between the terms of this Agreement and the medical staff bylaws or policies of the Hospital, this Agreement shall be controlling.
- (d) The Physician may be appointed to the medical staff of other hospitals only with the express written consent of the Hospital.

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

Case No.: ^{07-941-CD}
C.D.

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,
individually, in their own right.
Plaintiffs,

Type of Case: CIVIL

Type of Pleading:

**PRAECIPE FOR
WRIT OF SUMMONS**

vs.

Counsel of Record for this Party:

IRENE J. WILKINSON

Defendant.

JEFFREY LUNDY
PA I.D. 25823
LUKEHART, LUNDY AND GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767
(814) 938-8110

FILED

07/11/02/07
JUN 14 2007

William A. Shaw
Prothonotary/Clerk of Courts

2cc to Amy
1cc to writ
to Sheriff

Amy pd.
95.00

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,
individually, in their own right.

Case No.: C.D.

Plaintiffs,

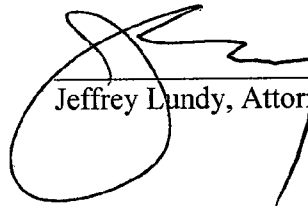
vs.

IRENE J. WILKINSON

Defendant.

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY: Please issue a Writ of Summons in a Civil Action
pursuant to Rule 1007 of the Pennsylvania Rules of Civil Procedure against the above-
named Defendant.



Jeffrey Lundy, Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION

COPY

SUMMONS

**Hannah Wallace, a minor, by her
parents Thomas Wallace and Sharon Wallace;
and Thomas Wallace and Sharon Wallace,
individually, in their own right**

Vs.

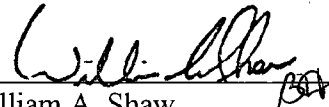
NO.: 2007-00941-CD

Irene J. Wilkinson

TO: IRENE J. WILKINSON

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 06/14/2007



William A. Shaw
Prothonotary

Issuing Attorney:

Jeffrey Lundy
219 East Union Street
Punxsutawney, PA 15767
(814) 938-8110

FILED¹²

AUG 10 2007

m/mo/a
William A. Shaw
Prothonotary/Clerk of Courts

no. 9/c

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor,
by her parents, THOMAS WALLACE
and SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on behalf of: Defendant,
Irene J. Wilkinson

Counsel of Record for this Party:

Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
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* Number 07 - 941 C.D.

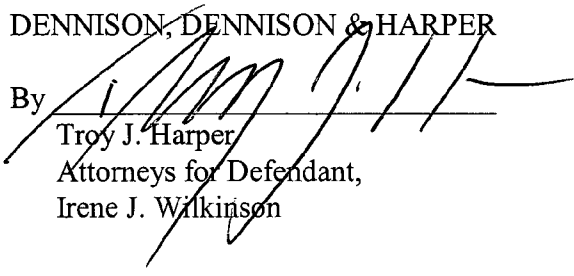
APPEARANCE

TO WILLIAM SHAW, CLEARFIELD COUNTY PROTHONOTARY:

Enter our Appearance on behalf of the Defendant, IRENE J. WILKINSON, in regard to
the above-captioned matter.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
Irene J. Wilkinson

Dated: August 9, 2007

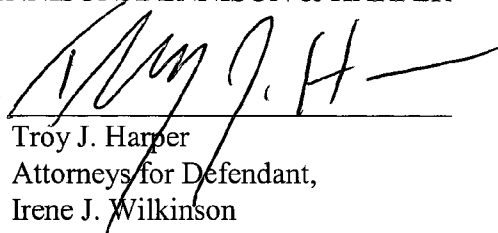
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Appearance was served on the 9th
day of August, 2007, by United States Mail, First Class, Postage Prepaid, addressed to the
following:

Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
Irene J. Wilkinson

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by
her parents, THOMAS WALLACE
and SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Praccipe for Rule to
File Complaint

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER

293 Main Street

Brookville, Pennsylvania 15825

(814) 849-8316

FILED

AUG 10 2007

m/12:10/12
William A. Shaw
Prothonotary/Clerk of Courts

1 sent to

ATTY

w/rua

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE AND SHARON WALLACE,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law

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*

* Number 07 - 941 C.D.

PRAECIPE FOR RULE TO FILE COMPLAINT

TO: THE PROTHONOTARY OF CLEARFIELD COUNTY:

Enter a Rule upon the Plaintiffs to file a Complaint within twenty (20) days after service
of the Rule, or judgment of non pros will be entered.

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

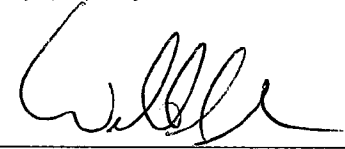
Attorneys for the Defendant

RULE:

TO THE PLAINTIFFS:

You are Ruled to file a Complaint within twenty (20) days after the service hereof or a
judgment of non pros will be entered against you.

Dated: August 10, 2007


Prothonotary

FILED

AUG 10 2007

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Praecipe for Rule to File Complaint was served on the 9th day of August, 2007, by United States Mail, First Class, Postage

Prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by
her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually and in their own right,
Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 941 of 2007, C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on Behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

AUG 27 2007

ml 1:20/um
William A. Shaw
Prothonotary/Clerk of Courts

vs c/c

HANNAH WALLACE, a minor, by
her parents, THOMAS WALLACE,
and SHARON WALLACE; and
THOMAS WALLACE and SHARON
WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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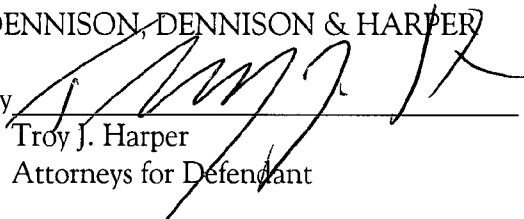
* Number 941 - 2007 C. D.

CERTIFICATE OF SERVICE

I hereby certify that I served a Rule to File Complaint issued by the Prothonotary of
Clearfield County, Pennsylvania, upon the Plaintiffs in the above captioned matter by sending the
same to their attorney, Jeffrey Lundy, Esq., Lukehart, Lundy & Gordon, 219 East Union Street,
P. O. Box 74, Punxsutawney, PA 15767, by regular mail, postage prepaid, on the 24th day of
August, 2007.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

: Case No.: 07-941 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading:
:
: **CERTIFICATE OF SERVICE**
:
: Counsel of Record for this Party:
:
: JEFFREY LUNDY
: PA I.D. 25823
: LUKEHART, LUNDY & GORDON
: 219 East Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814) 938-8110
:

FILED ^{2cc}
SEP 06 2007
William A. Shaw
Prothonotary/Clerk of Courts
Ang Lundy

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
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individually, in their own right.

Plaintiffs,

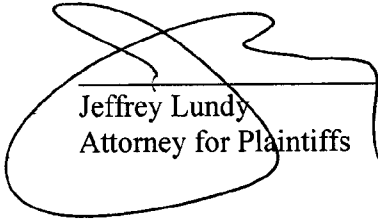
vs.

IRENE J. WILKINSON
Defendant

: Case No.: 07-941 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading:
:
: **CERTIFICATE OF SERVICE**
:
: Counsel of Record for this Party:
:
: JEFFREY LUNDY
: PA I.D. 25823
: LUKEHART, LUNDY & GORDON
: 219 East Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814) 938-8110
:

I hereby certify that I served a Complaint upon the Defendant in the above
captioned matter by sending the same to her attorney, Troy J. Harper, Dennison,
Dennison & Harper, 293 Main Street, Brookville, Pennsylvania, 15825, by regular mail,
postage prepaid, on the 5th day of September, 2007.

LUKEHART, LUNDY & GORDON



Jeffrey Lundy
Attorney for Plaintiffs

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

: Case No.: 07-941 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading:
:
: **COMPLAINT**
:
: Counsel of Record for this Party:
:
: JEFFREY LUNDY
: PA I.D. 25823
: LUKEHART, LUNDY & GORDON
: 219 East Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814) 938-8110
:

FILED 3cc
m/11:19/304 Atty Lundy
SEP 06 2007
SK

William A. Shaw
Prothonotary/Clerk of Courts

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Case No.: 07-941 C.D.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

COMPLAINT

AND NOW comes the Plaintiffs, Hannah M. Wallace, a minor, by and through her parents Thomas Wallace and Sharon Wallace, and Thomas Wallace and Sharon Wallace as individuals, by and through their Attorney, Jeffrey Lundy, Lukehart, Lundy and Gordon, and presents the following Complaint:

Facts

1. The Plaintiffs are Hannah M. Wallace, a minor, her parents Thomas Wallace and Sharon Wallace, adult individuals, who reside at 439 Thunderbird Road, DuBois, Clearfield County, Pennsylvania 15801.
2. The Defendant is Irene J. Wilkinson, an adult individual who resides at, P.O. Box 74, 3085 Salem Road, Bigler, Clearfield County, Pennsylvania 16825.
3. On July 16, 2005, Plaintiff Thomas Wallace was driving a 1996 GMC 1500 pick up truck in the West bound direction on State Route 322 toward the intersection of State Route 322 and State Route 410 in the village of Luthersburg,

Clearfield County, Pennsylvania. Plaintiff Hannah Wallace was a passenger in said vehicle.

4. Defendant Irene J. Wilkinson was driving a 2002 Dodge Stratus in the West bound direction on State Route 322 approaching the intersection of State Route 322 and State Route 410 in the Village of Luthersburg, Clearfield County, Pennsylvania.

5. At approximately 11:00 a.m. on the aforementioned date, the Defendant, failed to yield the right of way to the Plaintiffs vehicle and attempted to make a left hand turn off of State Route 322 onto State Route 410 entering the lane of travel for the Plaintiffs thereby striking Plaintiff's vehicle head on.

6. Both vehicles came to rest in the eastbound lane of State Route 322.

7. The negligence and carelessness of Defendant Wilkinson which caused the aforementioned accident included:

A. Failing to maintain the vehicle in the proper lane of travel; and under proper control;

B. Crossing the center line and striking Plaintiffs in the Plaintiff's proper lane of travel;

C. Not yielding to Plaintiffs right-of-way while turning left at an intersection in violation of 75 Pa. C.S.A. § 3322, as cited in Exhibit A.

8. Plaintiffs elected the full tort option on their insurance policy.

Count I – Plaintiff Hannah Wallace

9. Paragraphs one (1) through eight (8) are hereby incorporated by reference.

10. As a result of the aforementioned negligence and carelessness of Defendant Wilkinson, the Plaintiff Hannah Wallace has suffered certain physical damages and injuries as a result of the collision described as follows:

- A. Two Neck abrasions;
- B. Right lower leg contusions;
- C. Pain in the bi-lateral region of the neck and stiffness of the neck;
- D. Constant stiffness in the mid-back and muscle spasm in the mid-back;
- E. Cervical sprain and strain;
- F. Cervical muscle spasm;
- G. Cervical segmental dysfunction;
- H. Thoracic pain;
- I. C-2, C-5, C-6 was found to be malaligned;
- J. T-5 was revealed to have a subluxation;
- K. Mild pain and discomfort in the cervical region;
- L. Cervical spine ROM moderately restricted;
- M. Headaches;
- N. Post-concussion syndrome;

11. As a result of the aforementioned injuries the Plaintiff, Hannah Wallace, has undergone medical treatment including but not limited to the following:

- A. DuBois Regional Medical Center, Emergency Room Care, Physical examination and release;

- B. Advanced chiropractic, Dr. Aaron M. Peters, chiropractic treatment;
- C. DuBois Regional Medical Center for physical therapy;
- D. DuBois Regional Medical Center for worsening headaches, stiff neck and back pain treatment.

12. As a result of the aforementioned injuries, the Plaintiff has suffered and will continue to suffer pain, humiliation, embarrassment, destruction of daily habits and pursuits and loss of enjoyment of life in the future and has had her lifestyle as a young adolescent and future teenager significantly limited.

13. Plaintiff seeks reimbursement for medical expenses and pain and suffering.

14. Plaintiff is not limited in bringing this action pursuant to the Pennsylvania no-fault statute.

WHEREFORE, Plaintiff, Hannah Wallace, demands a judgment against the Defendant in the amount in excess of \$25,000.00.

Count II – Plaintiff Thomas Wallace

15. Paragraphs one (1) through fourteen (14) are hereby incorporated herein.

16. As a result of the aforementioned negligence and carelessness of the Defendant, Irene J. Wilkinson, the Plaintiff Thomas Wallace has suffered certain physical damages and injuries as a result of the collision described as follows:

- a. Neck and lower back pain;
- b. Cervicalgia, cervical sprain/strain and lumbar sprain/strain;
- c. Right sided neck pain;
- d. Bilateral shoulder blade pain;
- e. Left sided sciatic pain;

- f. Headaches;
- g. Concussion;
- h. Post-concussion syndrome and post-concussion headaches;
- i. Depression.

17. As a result of the aforementioned injuries, the Plaintiff, Thomas Wallace, has undergone medical treatment including but not limited to the following:

- a. DuBois Regional Medical Center Emergency Room for physical examination and release;
- b. DRMC, Medical Arts Building, Dr. Robert Usaitis for the following medical treatment:
 - 1) Post concussion syndrome and daily headaches;
 - 2) Neck pain;
 - 3) Depression;
- c. Dr. Ruediger Kratz, DRMC Neurology
- d. DuBois Magnetic Imaging Center
- e. Summit Rehabilitation Associates, P.C., motor nerve study, sensory nerve study, EMG study;
- f. Keystone Clinic of Chiropractic;
- g. P&G Place, physical therapy;
- h. Rain Tree MRI Services, Dr. Elkadi

18. As a result of the aforementioned injuries, the Plaintiff has suffered and will continue to suffer, pain, humiliation, embarrassment, disruption of daily habits and pursuits and loss of enjoyment of life and decrease in earning capacity and has had his lifestyle as a husband and father significantly limited.

19. As a direct and proximate cause of Defendant's negligence, Plaintiff has suffered great emotional distress and pain and suffering and will continue to suffer into the future great pain, agony, and inconvenience.

20. As a direct and proximate cause of the Defendant's negligence, Plaintiff has incurred medical expenses and will continue to expend further sums for medical treatment.

21. Plaintiff seeks reimbursement for medical expenses and pain and suffering and compensation for decrease in earning capacity.

WHEREFORE, Plaintiff, Thomas Wallace, demands a judgment against the Defendant in the amount in excess of \$25,000.00.

**Count III - Plaintiff Sharon Wallace
Loss of Consortium**

22. Paragraphs one (1) through twenty-one (21) are hereby incorporated herein.

23. As a direct and proximate cause of Defendant's negligence, Plaintiff Sharon Wallace has been deprived of aide, society, companionship, contributions and consortiums of her husband, Plaintiff Thomas Wallace as a result of his injuries, to her great detriment and loss.

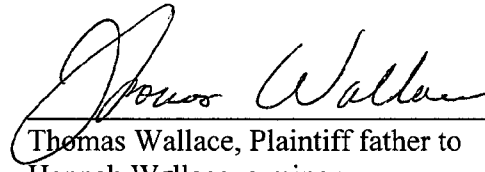
WHEREFORE, Plaintiff, Sharon Wallace, demands Judgment against the Defendant, Irene J. Wilkinson, in the amount in excess of \$25,000.00.

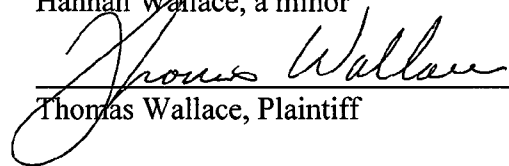
Respectfully submitted,
LUKEHART, LUNDY & GORDON


Jeffrey Lundy, Attorney for Plaintiffs

VERIFICATION

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.


Thomas Wallace, Plaintiff father to
Hannah Wallace, a minor


Thomas Wallace, Plaintiff

Sharon Wallace, Plaintiff

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

: Case No.: 07-941 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading:
: **DEMAND FOR JURY TRIAL**
:
: Counsel of Record for this Party:
:
: JEFFREY LUNDY
: PA I.D. 25823
: LUKEHART, LUNDY & GORDON
: 219 East Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814) 938-8110
:

FILED 2cc
m/10:53/Att'y Lundy
SEP 11 2007
William A. Shaw
Prothonotary/Clerk of Courts

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

HANNAH WALLACE, a minor, by her
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SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Case No.: 07-941 C.D.

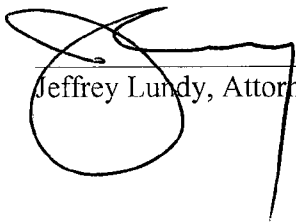
Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

DEMAND FOR JURY TRIAL

Plaintiffs, Hannah Wallace, Thomas Wallace and Sharon Wallace, by and through
their attorney, Jeffrey Lundy, hereby demand a trial by jury in the above captioned matter
pursuant to Pennsylvania Rules of Civil Procedure Rule 1007.1.



Jeffrey Lundy, Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102905
NO: 07-941-CD
SERVICE # 1 OF 1
PRAECIPE & SUMMONS

PLAINTIFF: HANNAH WALLACE, a minor b her parent Thomas Wallace & Sharon Wallace al
vs.
DEFENDANT: IRENE J. WILKINSON

SHERIFF RETURN

NOW, July 02, 2007 AT 2:38 PM SERVED THE WITHIN PRAECIPE & SUMMONS ON IRENE J. WILKINSON
DEFENDANT AT 3085 SALEM ROAD, BIGLER, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO
IRENE J. WILKINSON, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL PRAECIPE &
SUMMONS AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED

07/25/2007
OCT 29 2007

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	LUKEHART	269	10.00
SHERIFF HAWKINS	LUKEHART	269	26.17

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,

Chester A. Hawkins
by Marilyn Harris
Chester A. Hawkins
Sheriff

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *no cc*
m 19 02 2014
MAR 31 2014
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

* Civil Division

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* Number 07 - 941 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff, Thomas Wallace, and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff, Thomas Wallace, were served on the 28th day of March, 2008, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
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individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ^{NO CC}
m7910261
MAR 31 2018
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
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individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
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* Number 07 - 941 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff, Hannah Wallace, and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff, Hannah Wallace, were served on the 28th day of March, 2008, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Trey J. Harper

Attorneys for the Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FILED

APR 08 2008
M/10:45
William A. Shaw
Prothonotary/Clerk of Courts
w/c (GK)

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Answer and New Matter

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

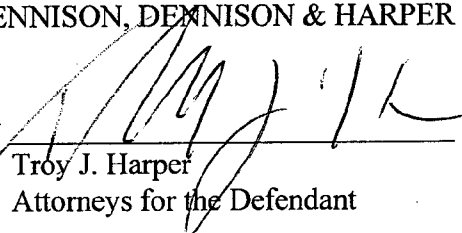
NOTICE TO PLEAD

TO: PLAINTIFFS:

You are hereby notified to plead to the within New Matter within twenty (20) days from
service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*

* Civil Action - Law

*
*
*

* Number 2007 - 941 C.D.

ANSWER AND NEW MATTER

AND NOW, comes the Defendant, IRENE J. WILKINSON, by and through her
attorneys, Dennison, Dennison & Harper, who file the following Answer and New Matter in
response to the Plaintiffs' Complaint:

1. After reasonable investigation, the Defendant, Irene J. Wilkinson, is without sufficient
knowledge and information to form a belief as to the truth of the averments of Paragraph 1 of the
Plaintiffs' Complaint, and said averments are therefore denied.

2. Admitted.

3. The averments of Paragraph 3 of the Plaintiffs' Complaint are admitted only insofar as
on or about July 16, 2005, the Plaintiff, Thomas Wallace, was operating a vehicle on State Route
322 in Clearfield County in which the Plaintiff, Hannah Wallace, was a passenger. With respect
to the remaining averments of Paragraph 3 of the Plaintiffs' Complaint, said averments are
denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

4. The averments of Paragraph 4 of the Plaintiffs' Complaint are admitted only insofar as on or about July 16, 2005, the Defendant, Irene J. Wilkinson, was operating a vehicle on State Route 322 in Clearfield County. With respect to the remaining averments of Paragraph 4 of the Plaintiffs' Complaint, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

5. The averments of Paragraph 5 of the Plaintiffs' Complaint are admitted only insofar as the Plaintiff, Thomas Wallace, and the Defendant, Irene J. Wilkinson, were operating vehicles on State Route 322 in Clearfield County. With respect to the remaining averments of Paragraph 3 of the Plaintiffs' Complaint, said averments are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

6. The averments of Paragraph 6 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

7. The averments of Paragraph 7 of the Plaintiffs' Complaint and subparagraphs A. through C. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

8. After reasonable investigation, the Defendant, Irene J. Wilkinson, is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 8 of the Plaintiffs' Complaint, and said averments are therefore denied.

Count I - Plaintiff, Hannah Wallace

9. Paragraph 9 of the Plaintiffs' Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent

any further response would be deemed required, the averments of Paragraphs 1 through 8 of this Answer are incorporated herein by reference thereto.

10. The averments of Paragraph 10 of the Plaintiffs' Complaint and subparagraphs A. through N. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

11. The averments of Paragraph 11 of the Plaintiffs' Complaint and subparagraphs A. through D. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

12. The averments of Paragraph 12 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

13. The averments of Paragraph 13 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

14. Paragraph 14 of Plaintiffs' Complaint constitutes a conclusion of law to which no response is required, and said averments are otherwise denied pursuant to Pa.R.C.P. 1029(e).

WHEREFORE, the Defendant, Irene J. Wilkinson, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL OF TWELVE DEMANDED.**

Count II - Plaintiff, Thomas Wallace

15. Paragraph 15 of the Plaintiffs' Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 14 of this Answer are incorporated herein by reference thereto.

16. The averments of Paragraph 16 of the Plaintiffs' Complaint and subparagraphs a. through i. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

17. The averments of Paragraph 17 of the Plaintiffs' Complaint and subparagraphs a. through h. thereof are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

18. The averments of Paragraph 18 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

19. The averments of Paragraph 19 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

20. The averments of Paragraph 20 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

21. The averments of Paragraph 21 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

WHEREFORE, the Defendant, Irene J. Wilkinson, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL OF TWELVE DEMANDED.**

**Count III - Plaintiff, Sharon Wallace
Loss of Consortium**

22. Paragraph 22 of the Plaintiffs' Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 21 of this Answer are incorporated herein by reference thereto.

23. The averments of Paragraph 23 of the Plaintiffs' Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

WHEREFORE, the Defendant, Irene J. Wilkinson, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL OF TWELVE DEMANDED.**

NEW MATTER

24. The terms and conditions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., are hereby incorporated herein by reference thereto as fully as the same bar and/or diminish any claim or cause of action of the Plaintiffs.

25. All of the Plaintiffs' claims are, or may be, barred by the applicable statute of limitations.

26. The Plaintiffs have failed to state a cause of action against the Defendant, Irene J. Wilkinson, upon which relief can be granted.

WHEREFORE, the Defendant, Irene J. Wilkinson, demands judgment in her favor and against the Plaintiffs. **JURY TRIAL OF TWELVE DEMANDED.**

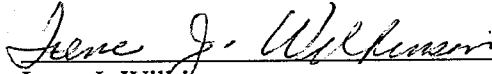
DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

VERIFICATION

I verify that the averments made in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.


Irene J. Wilkinson

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer and New Matter was served on the 3rd day of April, 2008, by United States Mail, First Class,

Postage Prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart, Lundy & Gordon
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for the Defendant

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

: Case No.: 07-941 C.D.
:
: Type of Case: CIVIL
:
: Type of Pleading:
:
: **ANSWER TO NEW MATTER**
:
: Counsel of Record for this Party:
:
: JEFFREY LUNDY
: PA I.D. 25823
: LUKEHART, LUNDY & GORDON
: 219 East Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814) 938-8110
:

FILED

APR 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

3cc

My Lundy

(6)

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

HANNAH WALLACE, a minor, by her
parents THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right.

Case No.: 07-941 C.D.

Plaintiffs,

vs.

IRENE J. WILKINSON
Defendant

ANSWER TO NEW MATTER

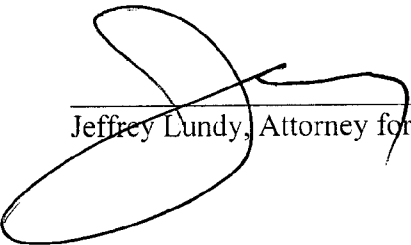
AND NOW comes the Plaintiffs, Hannah M. Wallace, a minor, by and through her parents Thomas Wallace and Sharon Wallace, and Thomas Wallace and Sharon Wallace as individuals, by and through their Attorney, Jeffrey Lundy, Lukehart, Lundy and Gordon, and presents the following Answer to New Matter:

24. Paragraph twenty-four (24) is a conclusion of law to which no responsive pleading is required.

25. Paragraph twenty-five (25) is a conclusion of law to which no responsive pleading is required. However, this matter is not barred by the statute of limitations.

26. Paragraph twenty-six (26) is a conclusion of law to which no responsive pleading is required.

Respectfully submitted,
LUKEHART, LUNDY & GORDON

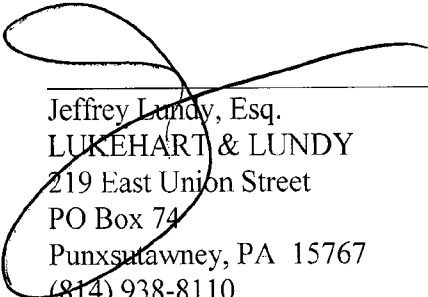


Jeffrey Lundy, Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Jeffrey Lundy, Esquire, do hereby certify that a true and correct copy of the within Answer to New Matter was served upon the Defendant's counsel of record by United States mail, first-class, postage prepaid this 14th day of April, 2008, as follows:

Troy J. Harper
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825



Jeffrey Lundy, Esq.
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767
(814) 938-8110

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by
her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually and in their own right,
Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 941 of 2007, C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on Behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
MAY 16 2008
m/11:15/c
William A. Shaw
Prothonotary/Clerk of Courts
no C/c
(6K)

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

^S
FILED

m/12:20
JAN 12 2009

William A. Shaw

Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
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*
* Civil Action - Law
*
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue,
Suite 200, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.


THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Friday, March 28, 2008
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED
m/12:20cm NoCC.
JAN 12 2009
(15)
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

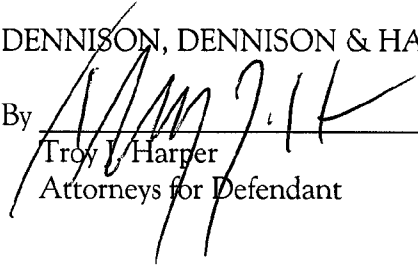
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 6001 Stonewood Drive,
Suite 304, Wexford, PA 15090 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

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FILED
m/12:202m No CC.
JAN 12 2009
(15)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

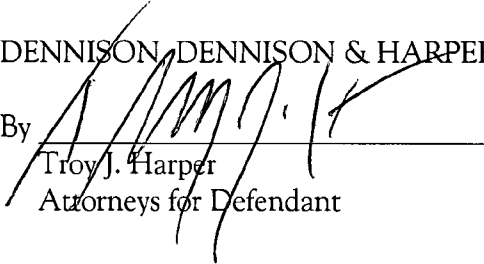
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Summit Rehabilitation, Medical Arts Building, Suite 300,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.


THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Friday, March 28, 2008
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

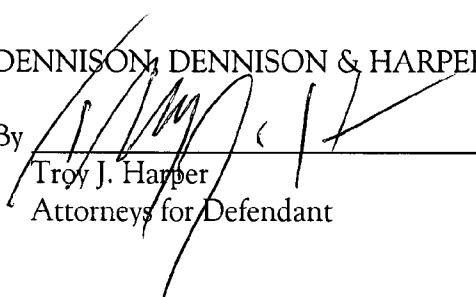
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

^S FILED No CC.
m/12:20 am
JAN 12 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

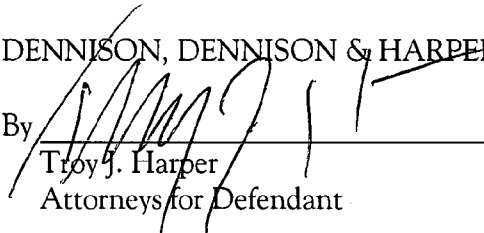
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

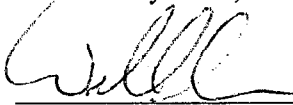
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED No CC
m/12:200m
JAN 12 2009
(LM)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
Honorary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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* In the Court of Common Pleas of
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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

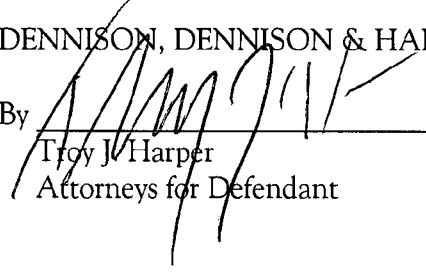
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
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Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

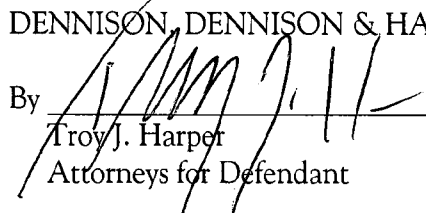
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Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

5
FILED
m/12:20LM NoCC.
JAN 12 2009
(LM)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

William A. Shaw
Notary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
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vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
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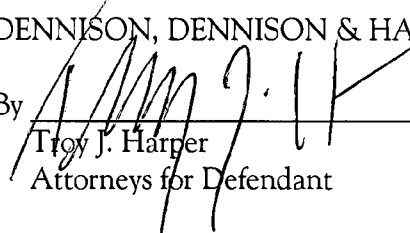
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
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Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
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objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
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Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. P. J. Valigorsky, DRMC West Unit, 100 Hospital Avenue, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
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copies or producing the things sought.

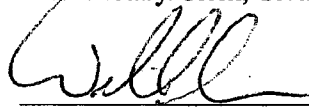
If you fail to produce the documents or things required by this subpoena within twenty
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to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to pain clinic records, physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

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219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

FILED No CC.

m/12:2009
JAN 12 2009

LM

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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vs.

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Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

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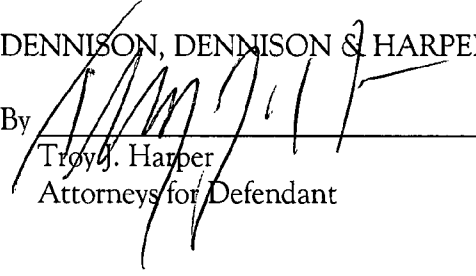
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Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
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* In the Court of Common Pleas of
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* Civil Action - Law

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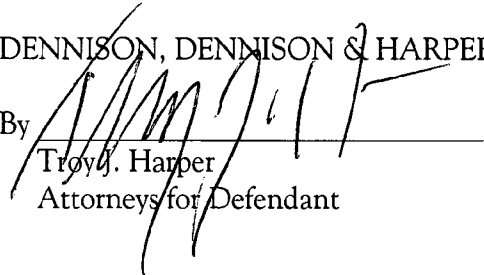
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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Outpatient Physical
Therapy, 100 Hospital Avenue (Name of Person or Entity)
DuBois, PA 15801

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to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
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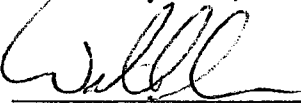
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NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
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TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
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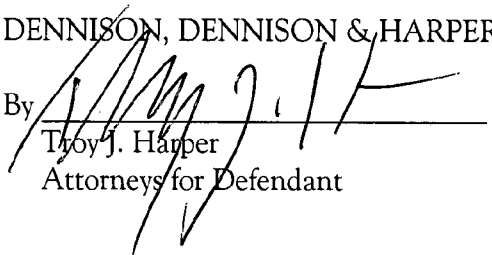
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED NoCC.
m/b: 2007
JAN 12 2009

(LM)
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
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Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

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293 Main Street
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* In the Court of Common Pleas of
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* Civil Action - Law

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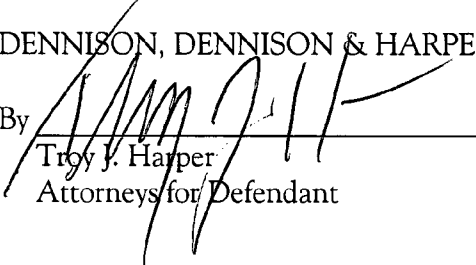
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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
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Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Headache Center, Building 1, 1606 Carmody Court,
Sewickley, PA 15143 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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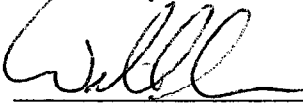
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NAME: Troy J. Harper, Esq.
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Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, emergency room reports, surgical reports, inpatient records, outpatient records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

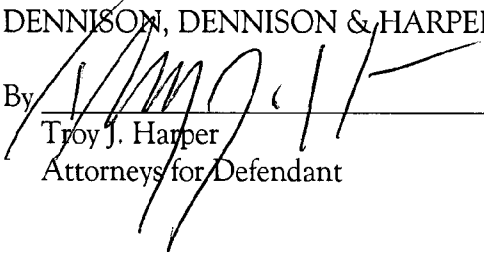
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

S
FILED
m/12:20cm No CC.
JAN 12 2009
(LM)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Ronald Statler, 11 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

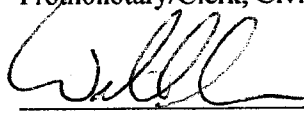
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to dentist and dental notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

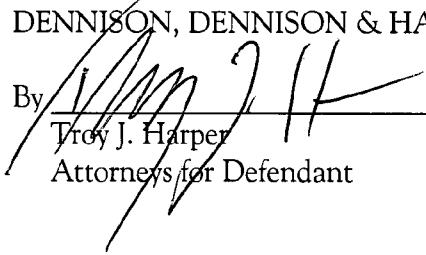
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Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED
m/12:202m No cc
JAN 12 2009
(LS)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

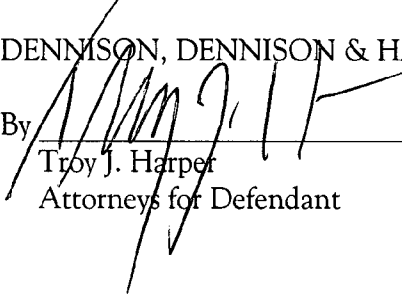
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

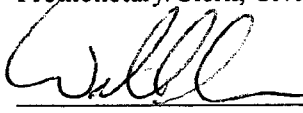
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

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FILED *Noce*
m/12:30pm
JAN 12 2009
(LM)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

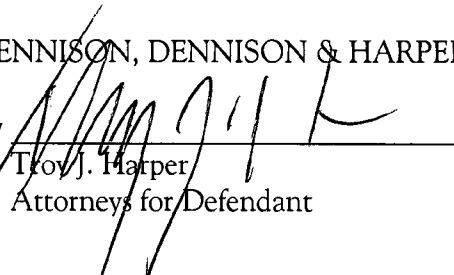
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
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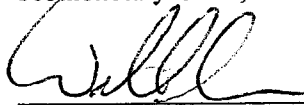
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

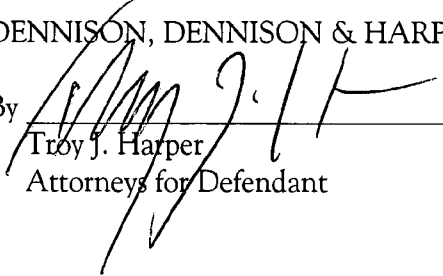
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P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED No CC
m/jd:20cm
JAN 12 2009

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

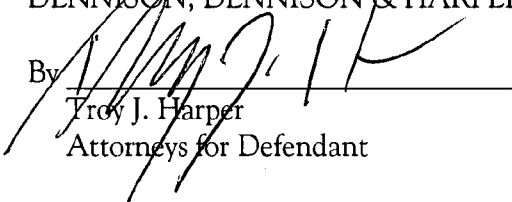
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
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Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
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Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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this subpoena, together with the certificate of compliance, to the party making this request at the
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(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934.

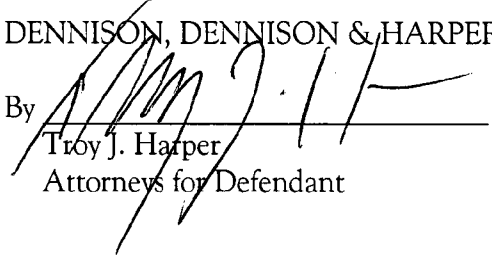
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Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5
FILED No cl
m/jd:adlm (LM)
JAN 12 2009

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
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objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211
145 Hospital Avenue, DuBois (Name of Person or Entity)
PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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this subpoena, together with the certificate of compliance, to the party making this request at the
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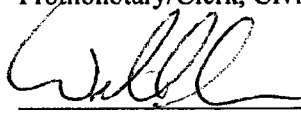
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NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

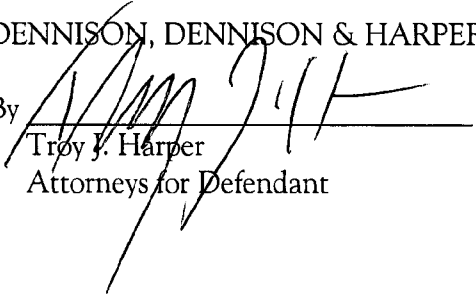
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

^s
FILED No cc
m/lp' 2007 (m)
JAN 12 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Nathaniel Cole, 190 West Parks Avenue, Suite 3, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

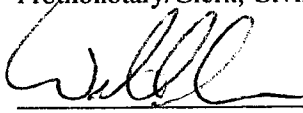
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to orthodontist and dental records, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

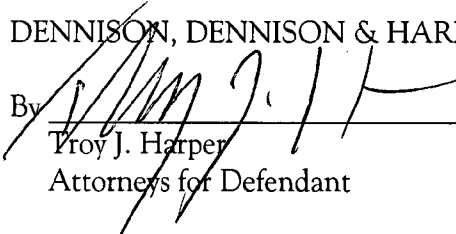
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Hannah
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
m110:33/04
JAN 29 2009 @P

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
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* Number 07 - 941 C.D.

NOTICE OF DEPOSITION

TO: HANNAH WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **HANNAH WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, April 22, 2009, at 9:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of January, 2009, a true and correct copy of the foregoing Notice of Deposition for Hannah Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Thomas
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

M 110:3381
JAN 29 2009

NO CC
(60)

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William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
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* Number 07 - 941 C.D.

NOTICE OF DEPOSITION

TO: THOMAS WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **THOMAS WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, April 22, 2009, at 10:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2009, a true and correct copy of the foregoing Notice of Deposition for Thomas Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff, Sharon
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m/10:33
JAN 29 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
*
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*
* Number 07 - 941 C.D.

NOTICE OF DEPOSITION

TO: SHARON WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **SHARON WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, April 22, 2009, at 11:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorney's for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2009, a true and correct copy of the foregoing Notice of Deposition for Sharon Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART, LUNDY & GORDON
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ^{NO CC}
m/11/05/30
FEB 02 2009 (610)

5 William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DRMC Primary Care Associates
145 Hospital Avenue, Suite 200
DuBois, PA 15801

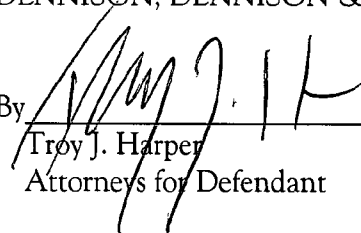
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of the Records Custodian of DRMC Primary Care Associates, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

A handwritten signature in black ink, appearing to read "Troy J. Harper", is written over a horizontal line.

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue,
Suite 200, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

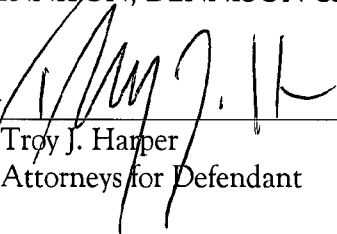
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DRMC Primary Care Associates
145 Hospital Avenue, Suite 200
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *NO EC*
3/11/05/61
FEB 02 2005 *(EL)*
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DRMC Neurology
Medical Arts Building, Suite 211
145 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of the Records Custodian of DRMC Neurology, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22**

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

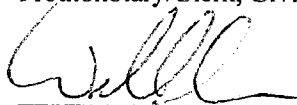
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DRMC Neurology
Medical Arts Building, Suite 211
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m/110524 NO
FEB 02 2009 CC
S William A. Shaw (610)
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Summit Rehabilitation
Medical Arts Building, Suite 300
145 Hospital Avenue
DuBois, PA 15801

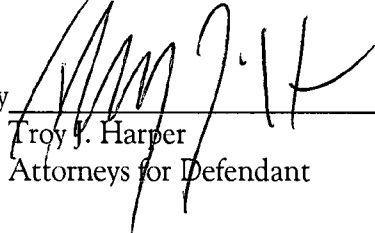
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of Summit Rehabilitation twenty (20) days from the service of this
Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison &
Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Summit Rehabilitation, Medical Arts Building, Suite 300,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

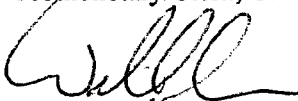
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Summit Rehabilitation, Medical Arts Building, Suite 300,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

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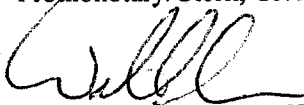
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NAME: Troy J. Harper, Esq.
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TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Summit Rehabilitation
Medical Arts Building, Suite 300
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m11105301
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m11:0530
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

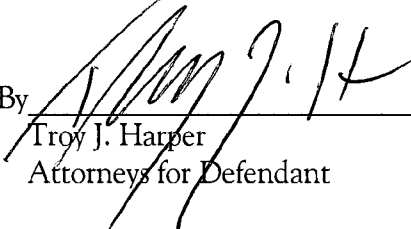
TO: Dr. P. J. Valigorsky
DRMC West Unit
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of Dr. P. J. Valigorsky twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. P. J. Valigorsky, DRMC West Unit, 100 Hospital Avenue, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

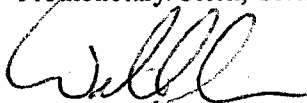
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to pain clinic records, physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

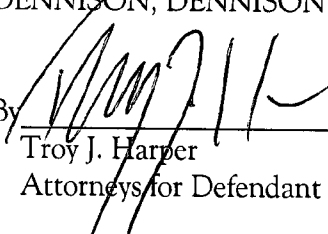
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Dr. P. J. Valigorsky
DRMC West Unit
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M711:05 BY CC
FEB 02 2009
S (610)
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Tri-State Neurosurgical Associates
6001 Stonewood Drive, Suite 304
Wexford, PA 15090

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of Tri-State Neurosurgical Associates twenty (20) days from the service
of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison
& Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 6001 Stonewood Drive,
Suite 304, Wexford, PA 15090 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Tri-State Neurosurgical Associates
6001 Stonewood Drive, Suite 304
Wexford, PA 15090

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ^{no}cc
mjm:0561
FEB 02 2009 @
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of the Records Custodian of DuBois Regional Medical Center twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

*

*

*

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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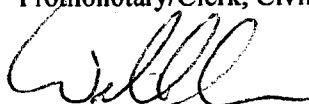
THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Friday, March 28, 2008
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

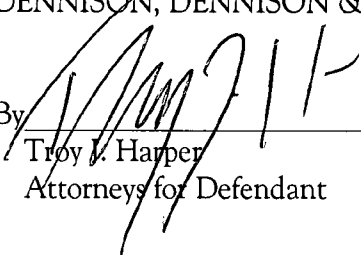
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy V. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

M/11/05/08
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*

* Civil Action - Law

*
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*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Advanced Chiropractic
77 Beaver Drive
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of Advanced Chiropractic twenty (20) days from the service of this
Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison &
Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
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DENNISON, DENNISON & HARPER

By

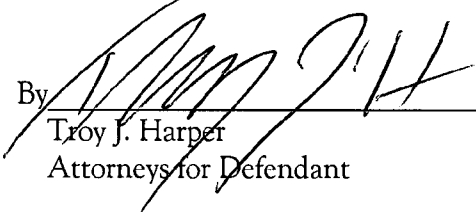

Troy J. Harper

Attorneys for Defendant

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

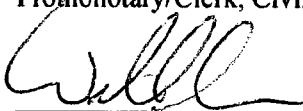
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

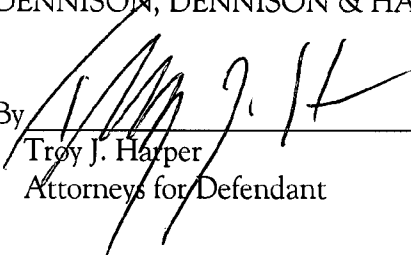
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Advanced Chiropractic
77 Beaver Drive
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m1105301
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *no cc*
01/10/05/01
FEB 02 2009 *610*

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
mhp/oss/ol
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*

* Civil Action - Law

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*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
Outpatient Physical Therapy
100 Hospital Avenue
DuBois, PA 15801

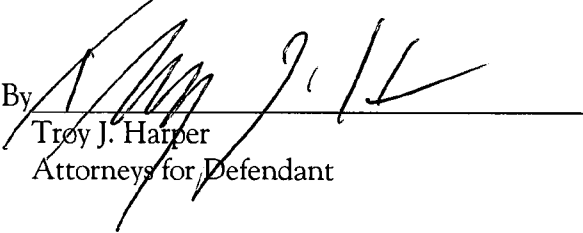
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of DuBois Regional Medical Center - Outpatient Physical Therapy
twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the
law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Outpatient Physical
Therapy, 100 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

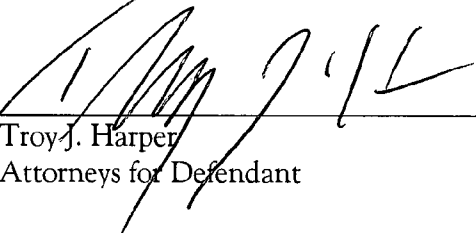
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
Outpatient Physical Therapy
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
11:05 AM
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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*

* Civil Action - Law

*
*
*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
UPMC Headache Center
Building 1
1606 Carmody Court
Sewickley, PA 15143

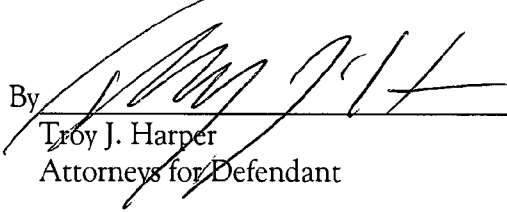
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of UPMC Headache Center twenty (20) days from the service of this
Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison &
Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Headache Center, Building 1, 1606 Carmody Court,
Sewickley, PA 15143 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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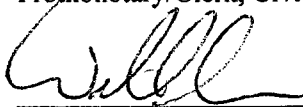
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to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, emergency room reports, surgical reports, inpatient records, outpatient records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
UPMC Headache Center
Building 1
1606 Carmody Court
Sewickley, PA 15143

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED
FEB 02 2009
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

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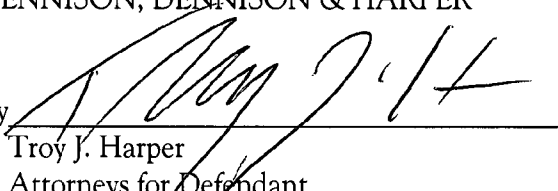
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Advanced Chiropractic
77 Beaver Drive
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

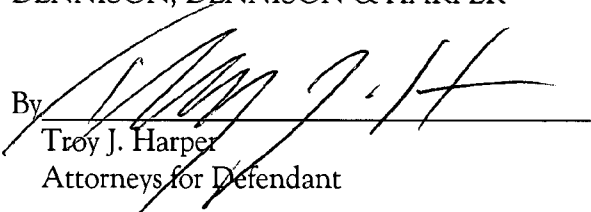
DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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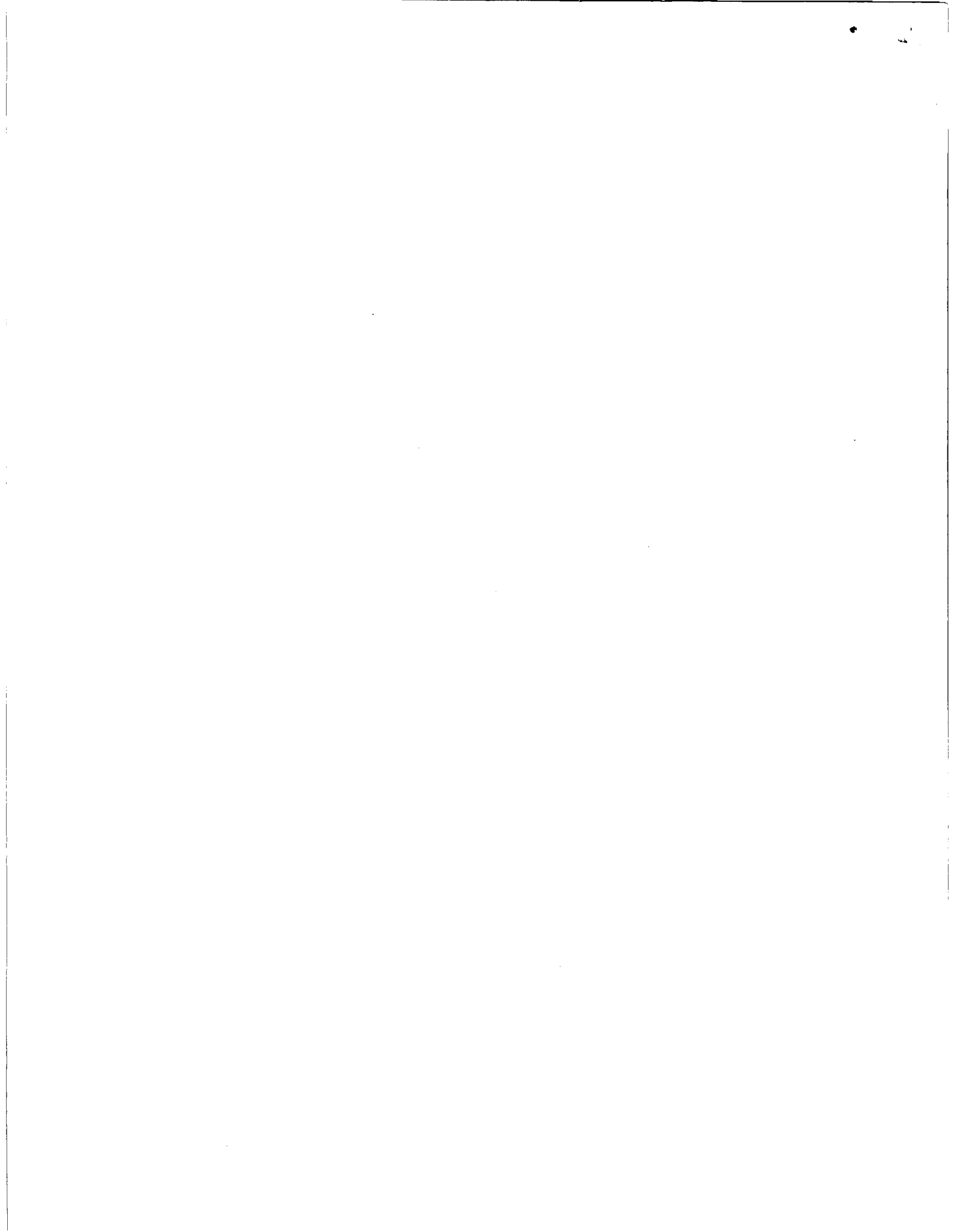
* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Advanced Chiropractic
77 Beaver Drive
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian of Advanced Chiropractic twenty (20) days from the service of this
Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison &
Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
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COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M/11:0567 No ec
FEB 02 2009 611
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
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vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M11105821
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*
*
*

* Civil Action - Law

*
*
*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of the Records Custodian of DuBois Regional Medical Center twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

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DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

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See attached

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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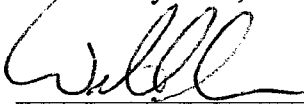
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(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

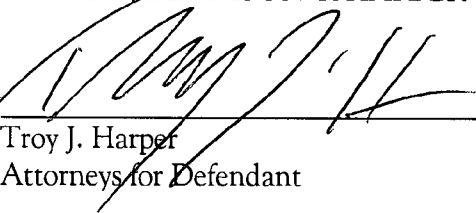
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ^{NO} ^{CC}

M/11/05
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DRMC Neurology
Medical Arts Building, Suite 211
145 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of the Records Custodian of DRMC Neurology twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

*

*

*

No. 2007-00941-CD

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22**

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211
145 Hospital Avenue, DuBois (Name of Person or Entity)
PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

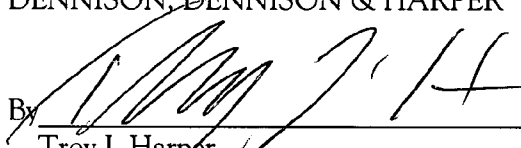
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DRMC Neurology
Medical Arts Building, Suite 211
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO
M/11:05/01 CC
FEB 02 2009 (610)
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Ronald Statler
11 Beaver Drive
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of Dr. Ronald Statler twenty (20) days from the service of this Notice and attached Subpoena
upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville,
Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Ronald Statler, 11 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

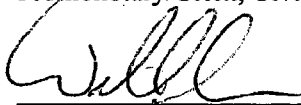
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to dentist and dental notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Ronald Statler
11 Beaver Drive
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED ¹⁰cc
M/11:05/6N
FEB 02 2009 (610)

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Nathaniel Cole
190 West Parks Avenue
Suite 3
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition of Dr. Nathaniel Cole twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Nathaniel Cole, 190 West Parks Avenue, Suite 3, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to orthodontist and dental records, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 30th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

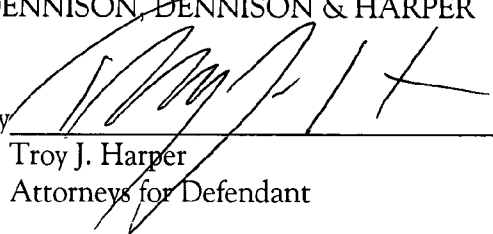
Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Nathaniel Cole
190 West Parks Avenue
Suite 3
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M/W 05/31
FEB 02 2009

NO CC
(610)

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

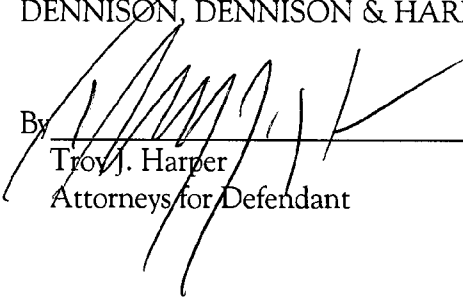
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

Dated: January 30, 2009

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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*

* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Headache Center, Building 1, 1606 Carmody Court,
Sewickley, PA 15143 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

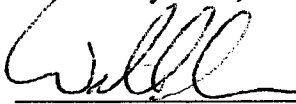
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, emergency room reports, surgical reports, inpatient records, outpatient records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

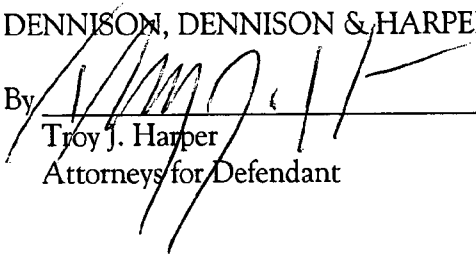
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

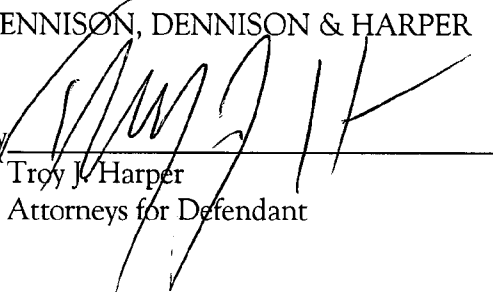
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

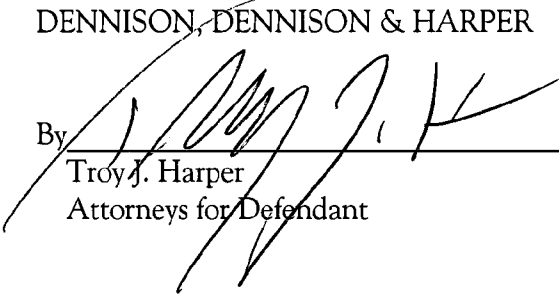
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

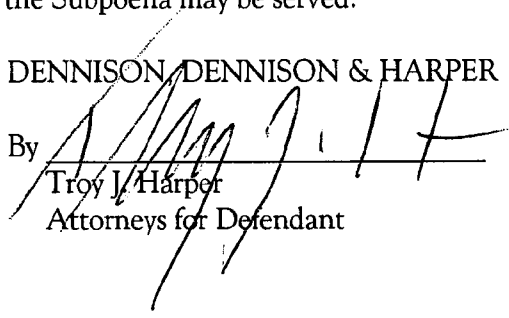
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

*

*

*

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Nathaniel Cole, 190 West Parks Avenue, Suite 3, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

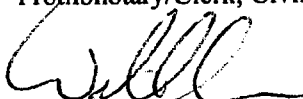
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to orthodontist and dental records, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
m/11:05/07
FEB 02 2007

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

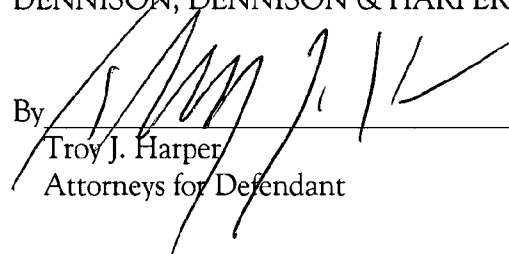
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

A handwritten signature in black ink, appearing to read 'Troy J. Harper', is written over a horizontal line.

Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
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* In the Court of Common Pleas of
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* Civil Action - Law
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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

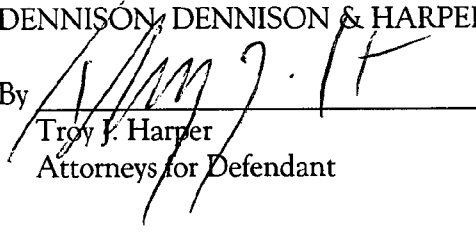
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22**

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue,
Suite 200, DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
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TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue,
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

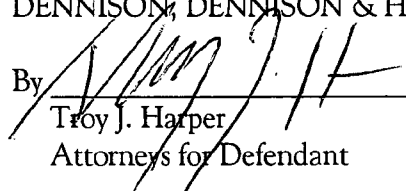
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
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Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

01/11/05/24
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

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2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

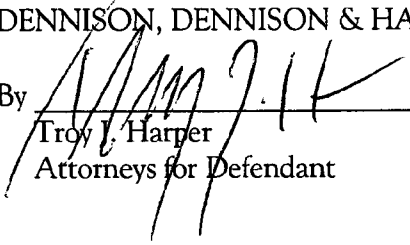
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 6001 Stonewood Drive,
Suite 304, Wexford, PA (Name of Person or Entity)
15090

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
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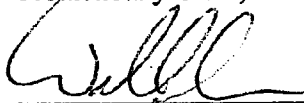
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

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219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

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219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

M/14:05/07
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

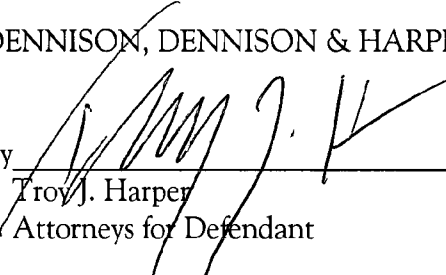
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

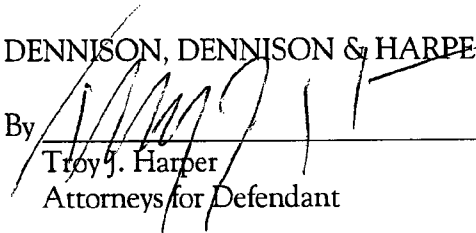
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

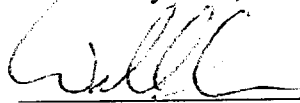
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

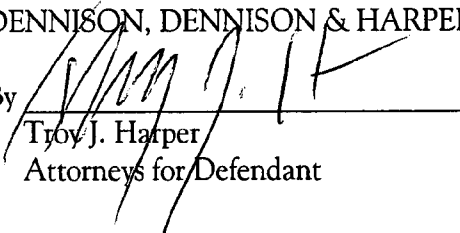
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

M/11/05/09
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

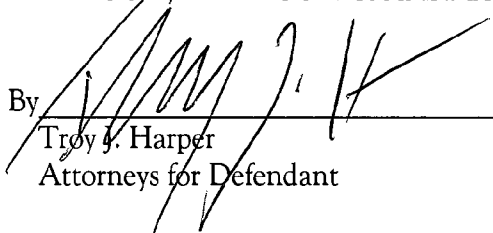
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counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her *
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs. *

No. 2007-00941-CD

Irene J. Wilkinson *
Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Summit Rehabilitation, Medical Arts Building, Suite 300,
145 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

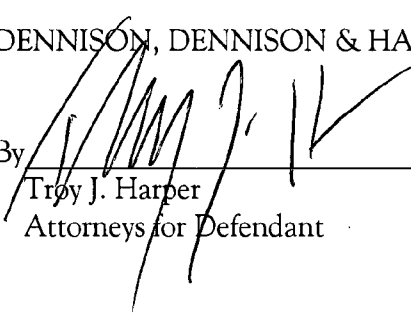
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
m/11:05/21
FEB 02 2009 @10

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William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

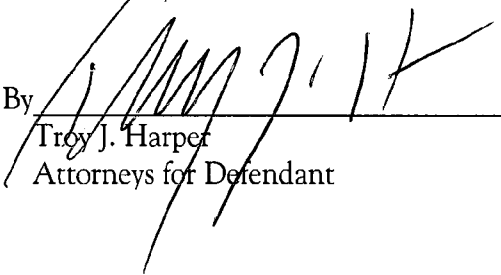
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

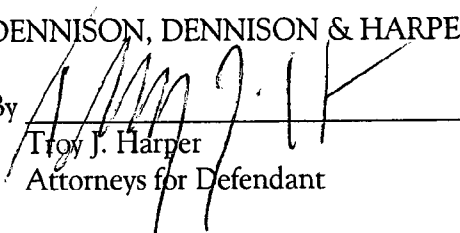
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
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objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. P. J. Valigorsky, DRMC West Unit, 100 Hospital Avenue, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

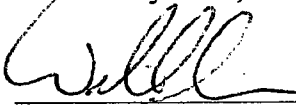
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to pain clinic records, physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

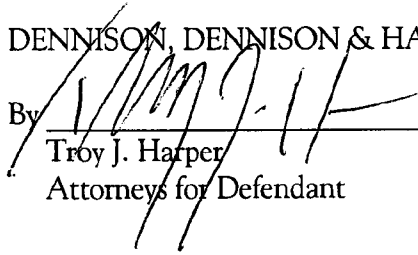
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

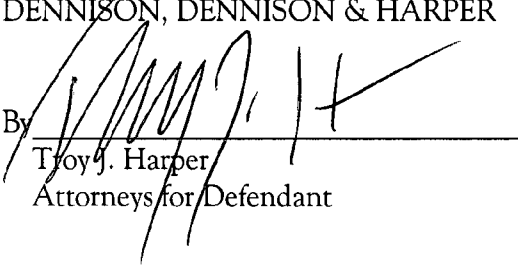
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P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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HANNAH WALLACE, a minor, by her
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WALLACE; and THOMAS WALLACE and
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vs.

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Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

NO
cc
m 110561
FEB 02 2009
S

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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IRENE J. WILKINSON,

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* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

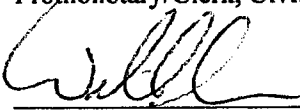
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

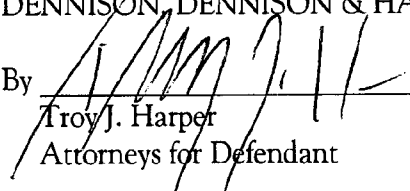
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

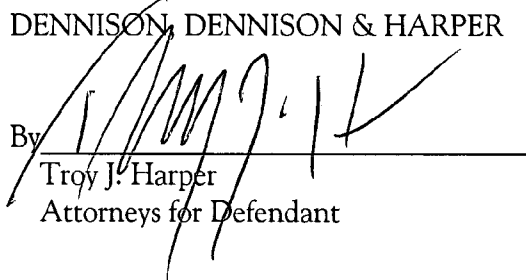
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5
FILED ^{NO}
M/11/05/09 CC
FEB 02 2009 (610)
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

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Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
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Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

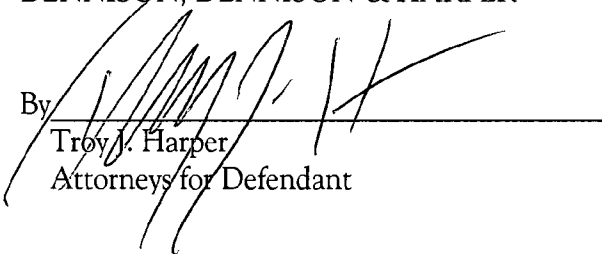
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

Dated: January 30, 2009

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

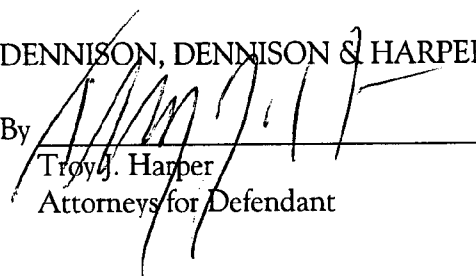
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Outpatient Physical
Therapy, 100 Hospital Avenue (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

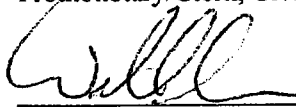
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

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Jeffrey Lundy, Esq.
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219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M/11/05/07
FEB 02 2007

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

Dated: January 30, 2009

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
*
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Friday, March 28, 2008
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

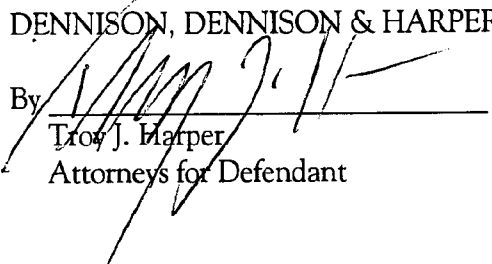
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Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
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P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

73110561
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
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counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
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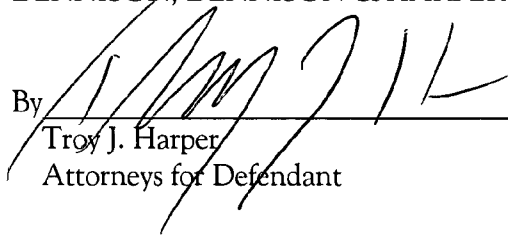
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4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
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Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Ronald Statler, 11 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to dentist and dental notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

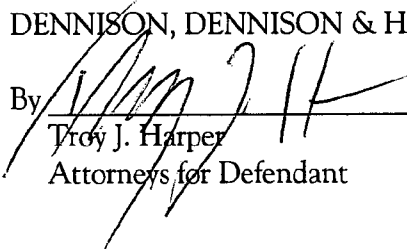
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *NO CC*
MJWOS/BJ
FEB 02 2009 *670*

S
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

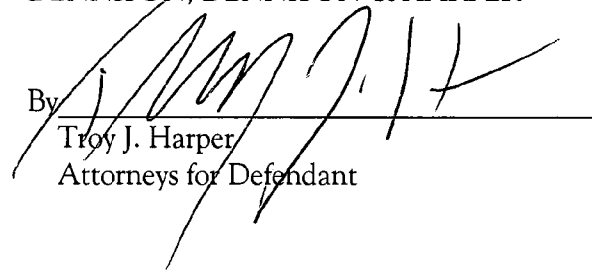
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

A handwritten signature in black ink, appearing to read 'Troy J. Harper', is written over a horizontal line.

Troy J. Harper
Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
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* Civil Action - Law
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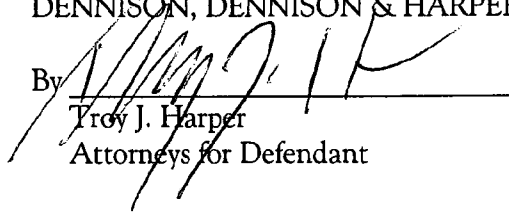
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
parents Thomas Wallace and
Sharon Wallace, and Thomas Wallace and
Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Advanced Chiropractic, 77 Beaver Drive, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.


If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

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P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED

MTI:05/64
FEB 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
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WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

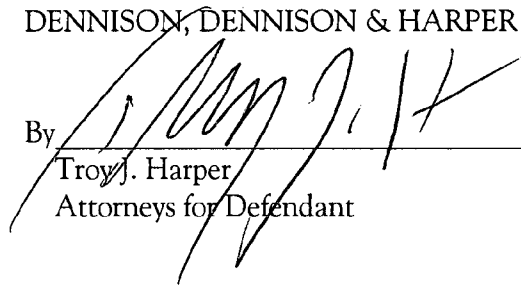
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

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this Certificate;
3. No objection to the Subpoena has been received;

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DENNISON, DENNISON & HARPER

By

A large, stylized handwritten signature in black ink, appearing to read 'Troy J. Harper', is written over a horizontal line.

Troy J. Harper

Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
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CIVIL ACTION - LAW

Number 2007 - 941 C.D.

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Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
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Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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* In the Court of Common Pleas of
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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

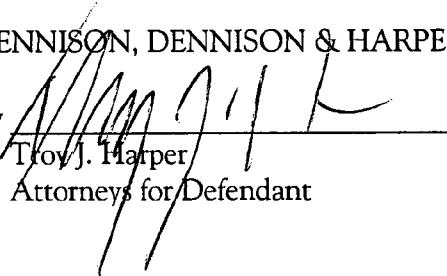
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
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Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
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Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, 100 Hospital Avenue,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:
See attached

Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

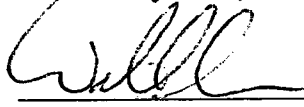
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

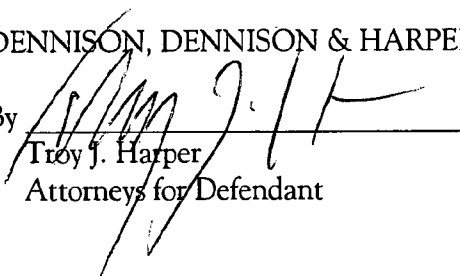
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DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

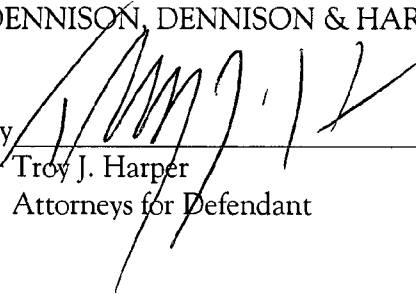
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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED
M/J:0564
FEB 02 2009

(610)
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
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* In the Court of Common Pleas of
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* Civil Action - Law

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CERTIFICATE PREREQUISITE TO SERVICE OF
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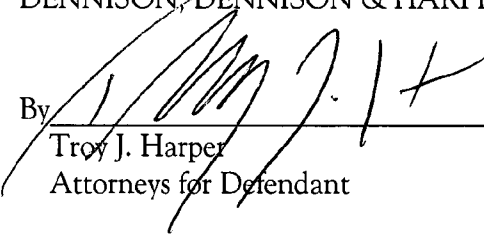
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DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for Defendant

Dated: January 30, 2009

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
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WALLACE; and THOMAS WALLACE and
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IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

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Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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own right,

Plaintiffs,

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IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
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**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
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Dated: January 9, 2009

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace, a minor, by her
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Sharon Wallace, individually, in their own right
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, Medical Arts Building, Suite 211
145 Hospital Avenue, DuBois (Name of Person or Entity)
PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825


TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Friday, March 28, 2008
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

Any and all medical records in your possession for Hannah Wallace, DOB 1/14/1996, SSN: 184-76-4934, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

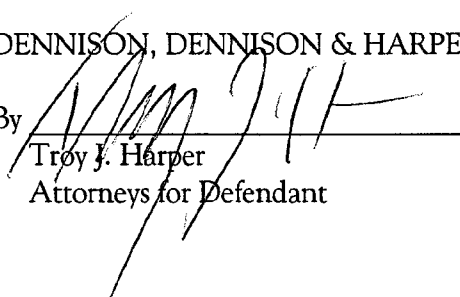
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 9th day of January, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

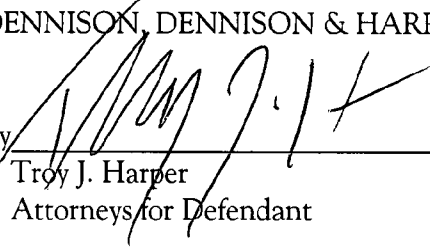
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 30th day of January, 2009, by United States Mail, First Class, postage
prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

5 FILED

MAY 29 2009

11:00/11
William A. Shaw
Prothonotary/Clerk of Courts (611)
no 11

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Revised Notice of
Deposition of Plaintiff, Hannah
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
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*
* Number 07 - 941 C.D.

REVISED NOTICE OF DEPOSITION

TO: HANNAH WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **HANNAH WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, June 29, 2009, at 9:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of May, 2009, a true and correct copy of the foregoing Revised Notice of Deposition for Hannah Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

5 FILED

MAY 29 2009

m/ 11:00/

William A. Shaw
Prothonotary/Clerk of Courts

NO 42 (610)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Revised Notice of
Deposition of Plaintiff, Sharon
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
*
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*
* Number 07 - 941 C.D.

REVISED NOTICE OF DEPOSITION

TO: SHARON WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **SHARON WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, June 29, 2009, at 11:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of May, 2009, a true and correct copy of the foregoing Revised Notice of Deposition for Sharon Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

5 FILED

MAY 29 2009

ml 11:00/ W
William A. Shaw
Prothonotary/Clerk of Courts
No c/c (6H)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 07 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Revised Notice of
Deposition of Plaintiff, Thomas
Wallace

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS
WALLACE and SHARON WALLACE,
individually, in their own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Action Law
*
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*
* Number 07 - 941 C.D.

REVISED NOTICE OF DEPOSITION

TO: THOMAS WALLACE
c/o Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

Take notice that the deposition of **THOMAS WALLACE** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Monday, June 29, 2009, at 10:00 a.m., at the law offices of DENNISON, DENNISON & HARPER, 293 Main Street, Brookville, Pennsylvania 15825. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of May, 2009, a true and correct copy of the foregoing Revised Notice of Deposition for Thomas Wallace was mailed by United States mail, first class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esquire
LUKEHART & LUNDY
219 East Union Street
PO Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FILED

SEP 23 2010

m/v:306

William A. Shaw
Notary Public/Clerk of Courts

No C/L

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

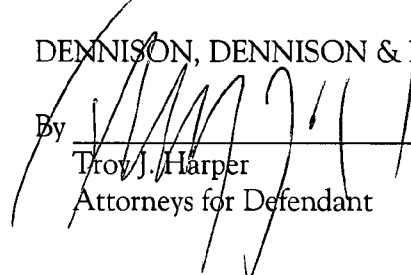
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center - Outpatient Physical
Therapy, 100 Hospital (Name of Person or Entity)
Avenue, DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

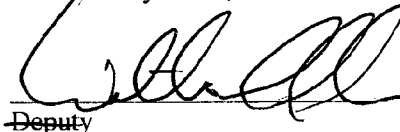
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



~~Deputy~~

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

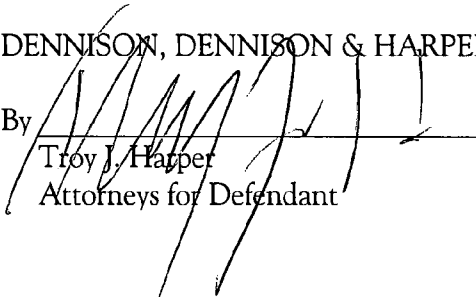
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED

SEP 23 2010

m/1:30/c

William A. Shaw
Notary Public/Clerk of Courts

No 41

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

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*

* Civil Action - Law

*

*

*

* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

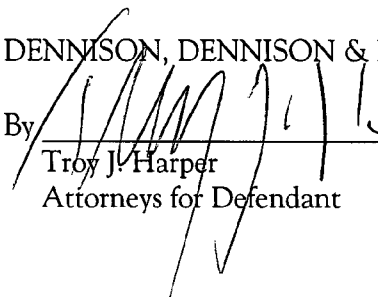
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue, DuBois,
PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

MRI Cervical Spine taken on 6/27/2006

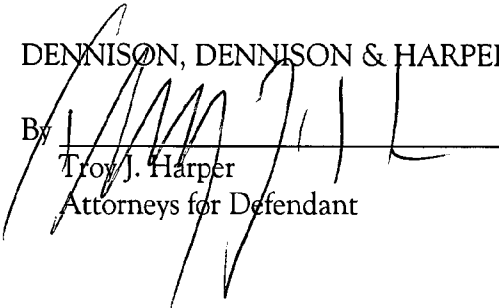
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED⁽²⁾

SEP 23 2010

11:30h

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

No 6/

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*

* Civil Action - Law

*
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*

* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
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If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court

Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

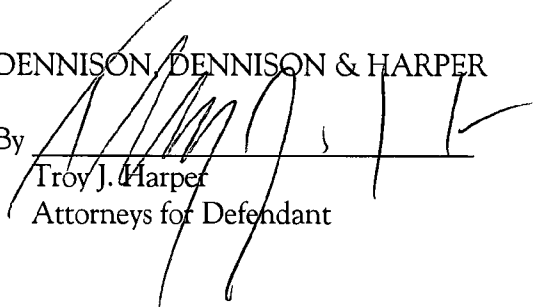
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED

SEP 23 2010
m/1:30/
William A. Shaw
Prothonotary/Clerk of Courts
m c/c

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

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* Civil Action - Law

*

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

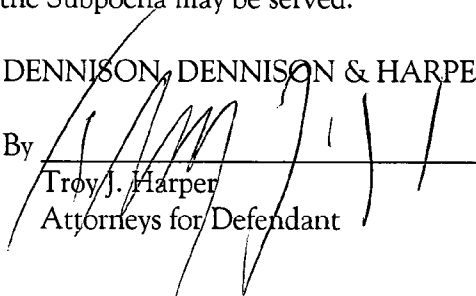
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, P&G Physical Therapy, 100 Meadow Lane, Suite 2, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See Exhibit A attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

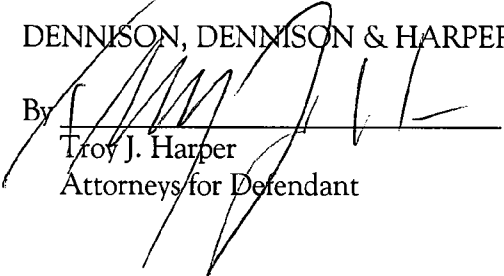
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED[®]

SEP 23 2010

W/1:30 PM
William A. Shaw
Prothonotary/Clerk of Courts

no C/C

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

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IRENE J. WILKINSON,

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* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Jeremy Brubaker, D.C., 52 Main Street, Falls Creek, PA 15840

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

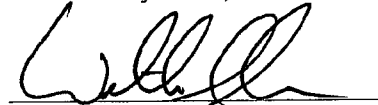
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



~~Deputy~~

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

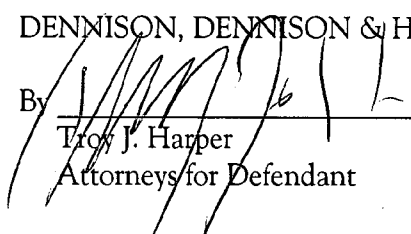
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

FILED[®]

SEP 23 2010

W/1136/2

William A. Shaw
Prothonotary/Clerk of Courts

no 9/c

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

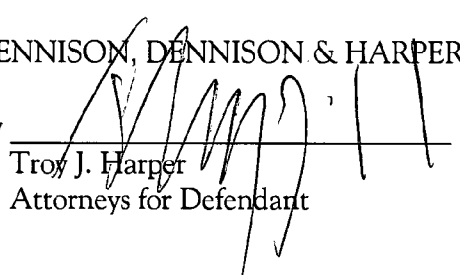
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 1600 Corapolis Heights
Road, Suite G, Moon (Name of Person or Entity)
Township, PA 15108

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

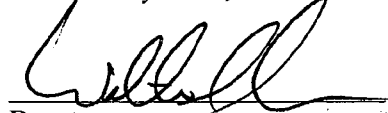
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

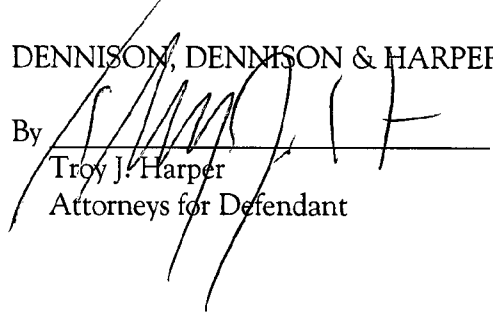
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NACC.
m/ 1:30pm
SEP 23 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

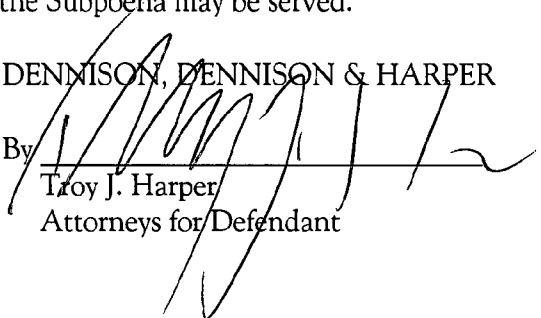
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
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Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Imaging Department, 100
Hospital Avenue, DuBois, (Name of Person or Entity)
PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

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(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

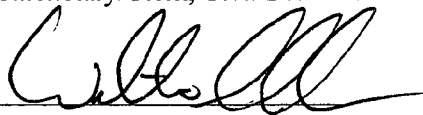
TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

1. 7/17/2005 X-rays of cervical spine
2. 7/17/2005 X-rays of lumbar spine
3. 9/30/2005 CT of the head
4. 3/29/2007 CT of cervical spine
5. 3/29/2007 Cervical myelogram
6. 3/25/2008 X-ray of lumbar spine

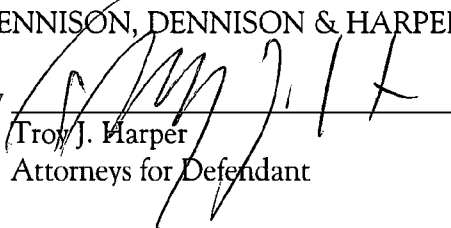
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

9
bld
FILED
SEP 30 2010
William A. Shaw
Notary Public/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

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*

* Civil Action - Law

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*

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

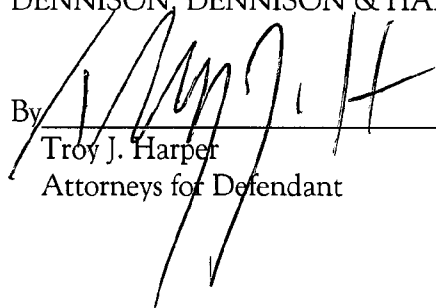
3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

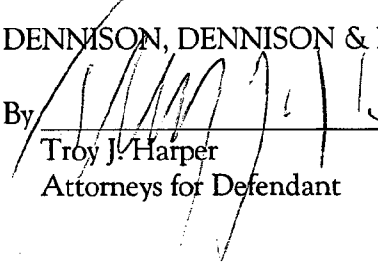
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

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to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue, DuBois,
PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

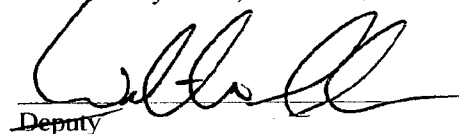
THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

MRI Cervical Spine taken on 6/27/2006

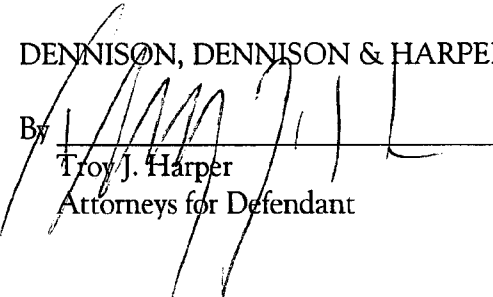
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

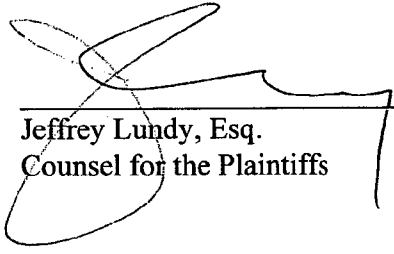
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* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO PA.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10


Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

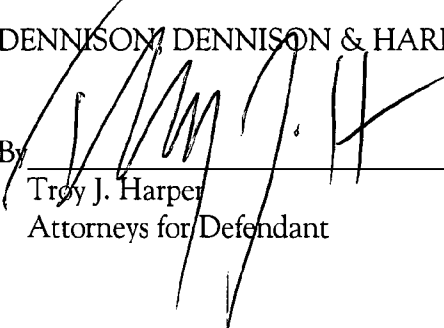
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED *NCC*
SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

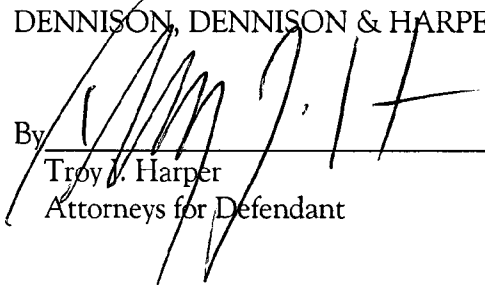
1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
*
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*
* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

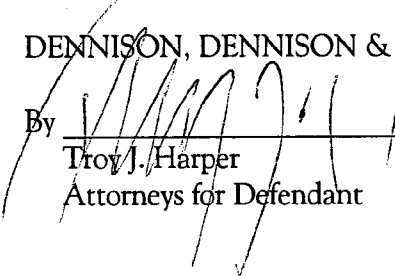
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center - Outpatient Physical
Therapy, 100 Hospital (Name of Person or Entity)
Avenue, DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

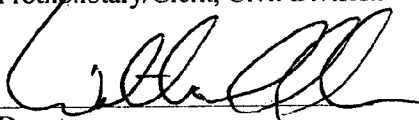
THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

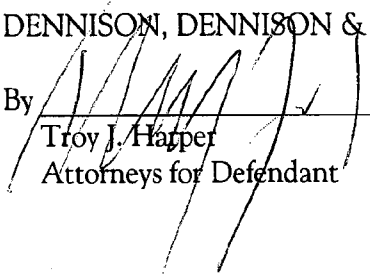
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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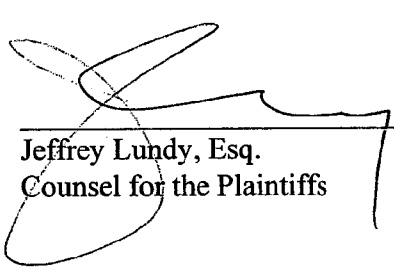
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* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO PA.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10



Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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FILED
MTI:0764
SEP 30 2013
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;

2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;

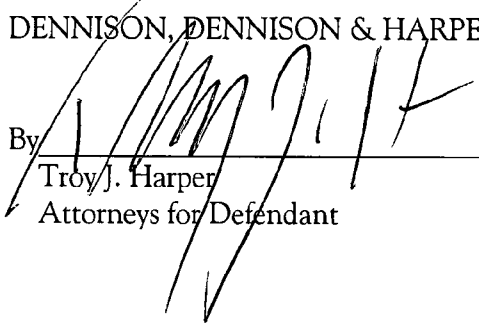
3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

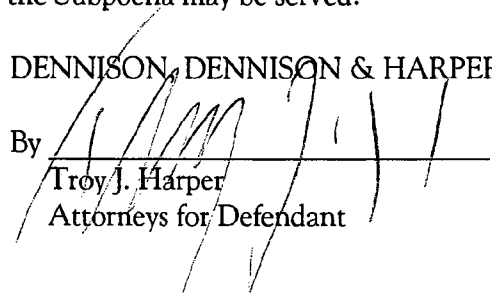
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, P&G Physical Therapy, 100 Meadow Lane, Suite 2, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See Exhibit A attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

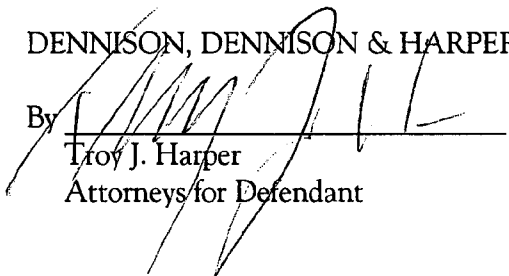
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

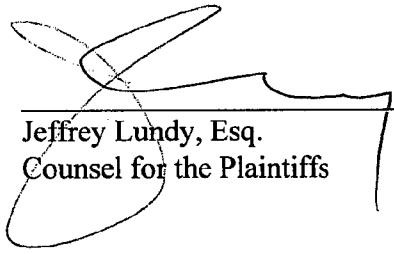
Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO PA.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10


Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5 FILED NO
cc
SEP 30 2010

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

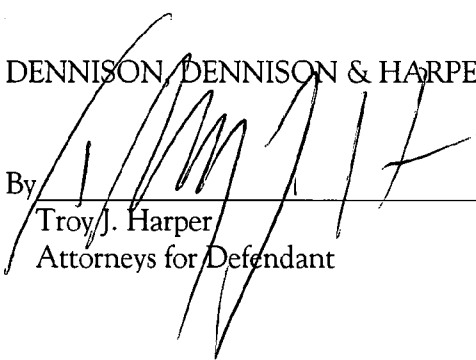
1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
*
*
*
*
* Civil Action - Law
*
*
*
* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

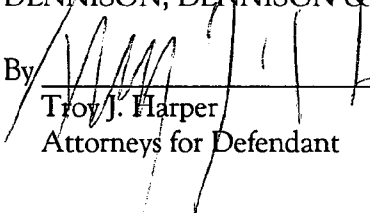
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

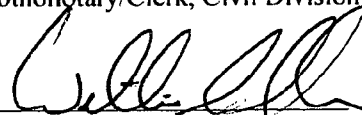
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co. Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

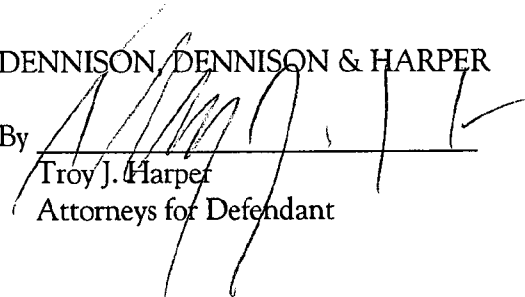
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

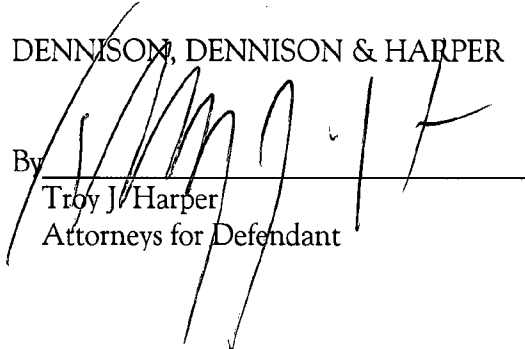
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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Bled
FILED
SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her	*	In the Court of Common Pleas of
parents, THOMAS WALLACE and SHARON	*	Clearfield County, Pennsylvania
WALLACE; and THOMAS WALLACE and	*	
SHARON WALLACE, individually, in their	*	
own right,	*	
Plaintiffs,	*	
	*	
vs.	*	Civil Action - Law
	*	
IRENE J. WILKINSON,	*	
	*	
Defendant.	*	Number 2007 - 941 C.D.

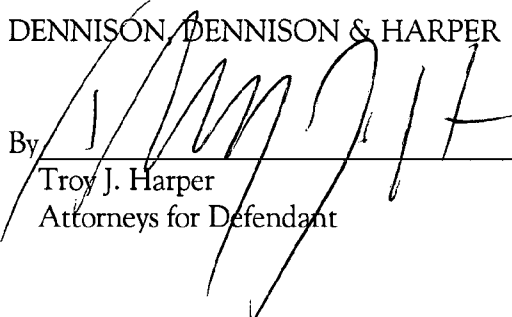
Defendant.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 1600 Corapolis Heights
Road, Suite G, Moon (Name of Person or Entity)
Township, PA 15108

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

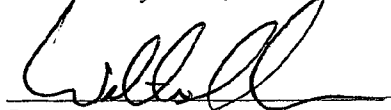
TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
on Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

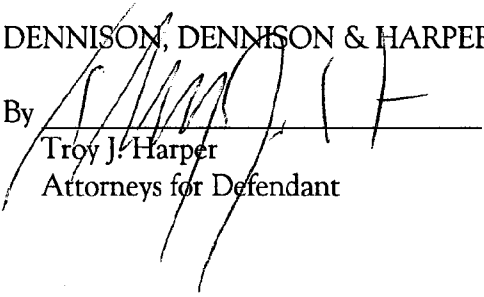
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

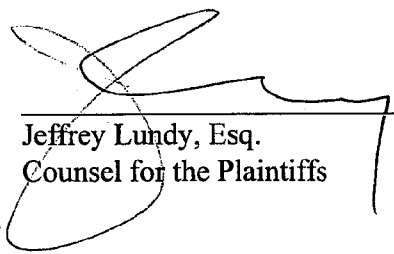
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* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO P.A.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10



Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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FILED
M 11:07:30
SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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own right,

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vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

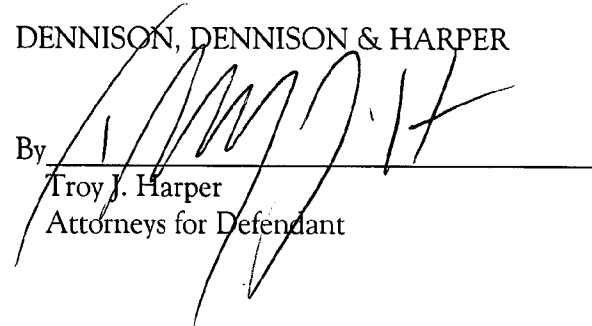
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

A large, stylized handwritten signature in black ink, appearing to read 'TJH', is written over a horizontal line.

Troy J. Harper
Attorneys for Defendant

Dated: September 29, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

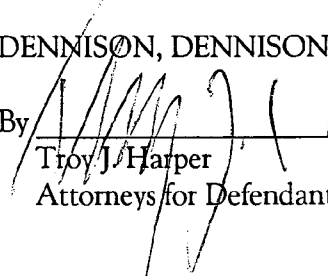
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Jeremy Brubaker, D.C., 52 Main Street, Falls Creek, PA 15840
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

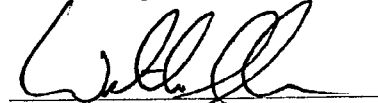
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



~~Deputy~~

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

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Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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*

* Civil Action - Law

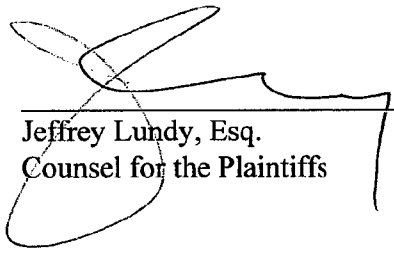
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* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO PA.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10


Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

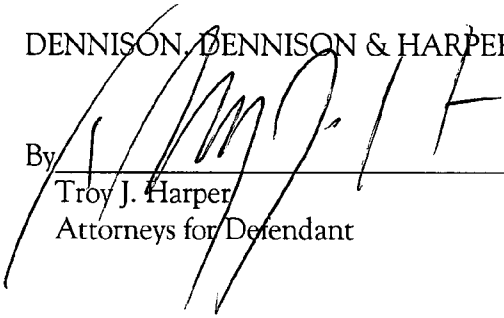
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate Prerequisite to
Service of a Subpoena Pursuant to Pa.R.C.P.
4009.22

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED NO CC
SEP 30 2010
William A. Shatz
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
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Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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*

* Civil Action - Law

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* Number 2007 - 941 C.D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Irene J. Wilkinson, through her
counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

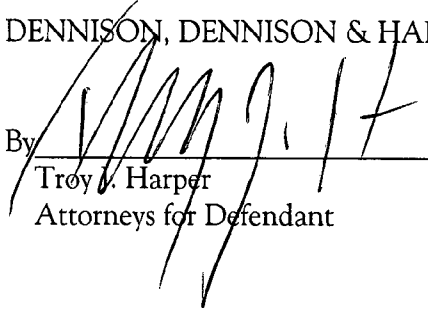
1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was
mailed or delivered to each party at least twenty (20) days prior to the date on which the
Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to
this Certificate;
3. A copy of the Consent to Service of a Subpoena and Waiver of Time Period signed
by Plaintiff's attorney is attached hereto.

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: September 29, 2010

DENNISON, DENNISON & HARPER

By


Troy L. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

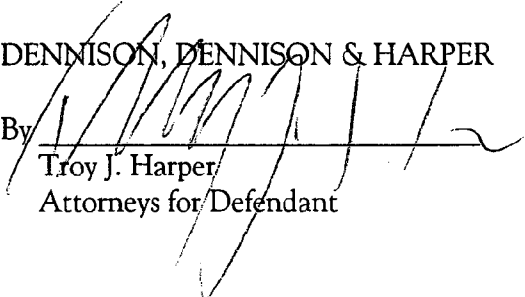
**TO : HANNAH WALLACE, a minor, by her parents, THOMAS WALLACE and
SHARON WALLACE; and THOMAS WALLACE and SHARON WALLACE,
individually, in their own right, Plaintiffs**

Irene J. Wilkinson, by and through her attorneys, Dennison, Dennison & Harper, intends
to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20)
days from the date listed below in which to file of record and serve upon the undersigned an
objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: September 22, 2010

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Imaging Department, 100
Hospital Avenue, DuBois, (Name of Person or Entity)
PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

1. 7/17/2005 X-rays of cervical spine
2. 7/17/2005 X-rays of lumbar spine
3. 9/30/2005 CT of the head
4. 3/29/2007 CT of cervical spine
5. 3/29/2007 Cervical myelogram
6. 3/25/2008 X-ray of lumbar spine

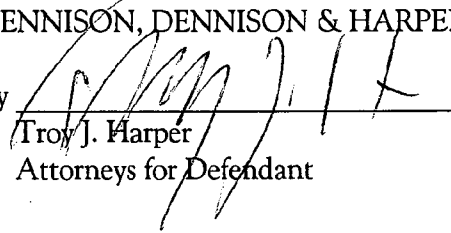
CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 22nd day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lukehart & Lundy
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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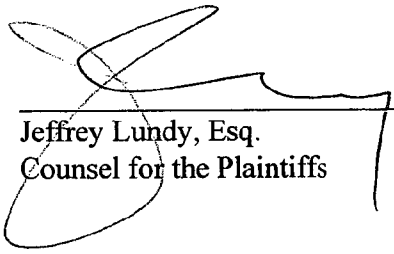
*

* Number 2007 - 941 C.D.

**CONSENT TO SERVICE OF A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO PA.R.C.P. 4009.21,
ET SEQ., AND WAIVER OF TIME PERIOD**

Jeffrey Lundy, Esq., counsel for the Plaintiffs in the above captioned matter,
acknowledges receipt of the Notice of Intent to Serve Subpoena identical to the one attached
hereto. The Plaintiffs have no objection to service of the Subpoena and waive the twenty (20)
day waiting period.

Date: 9/23/10


Jeffrey Lundy, Esq.
Counsel for the Plaintiffs

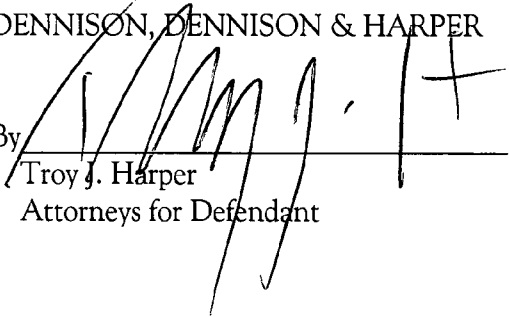
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P.
4009.22 was served on the 29th day of September, 2010, by United States Mail, First Class,
postage prepaid, addressed to the following:

Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

9 FILED No
MTI:0567 cc
SEP 30 2010
William A. Snow
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Jeremy Brubaker, D.C.
52 Main Street
Falls Creek, PA 15840

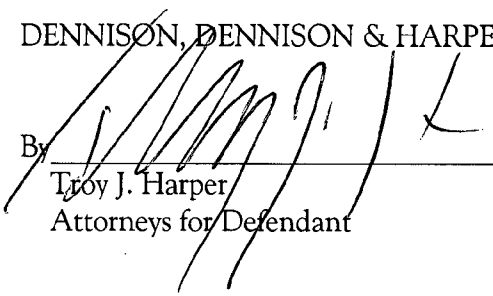
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of Jeremy Brubaker, D.C., twenty (20) days from the service of this Notice and attached
Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street,
Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

Vs.

Irene J. Wilkinson
Defendant(s)

No. 2007-00941-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Jeremy Brubaker, D.C., 52 Main Street, Falls Creek, PA 15840
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

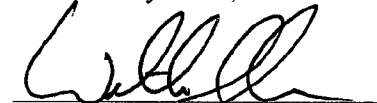
If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


~~Deputy~~

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 29th day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

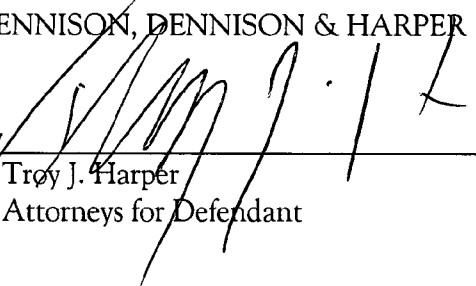
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Jeremy Brubaker, D.C.
52 Main Street
Falls Creek, PA 15840

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5 FILED NO CC
SEP 30 2010
William A. Snow
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
Tri-State Neurosurgical Associates
1600 Corapolis Heights Road, Suite G
Moon Township, PA 15108

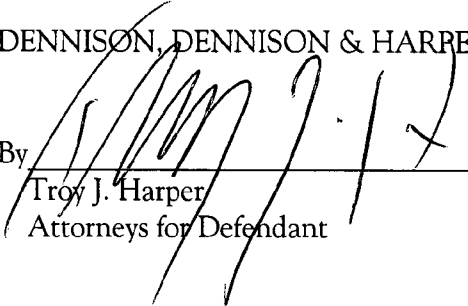
PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian for Tri-State Neurosurgical Associates, twenty (20) days from the
service of this Notice and attached Subpoena upon the same, at the law offices of Dennison,
Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARRER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Tri-State Neurosurgical Associates, 1600 Corapolis Heights
Road, Suite G, Moon (Name of Person or Entity)
Township, PA 15108

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

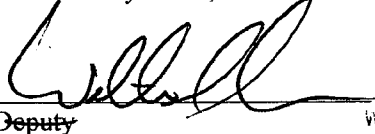
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 29th day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

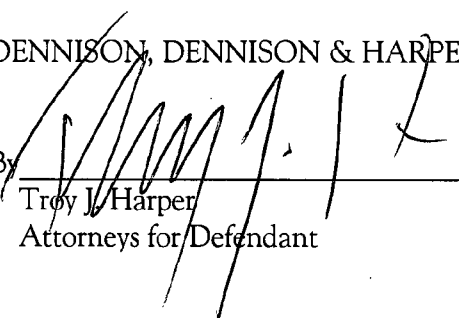
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Tri-State Neurosurgical Associates
1600 Corapolis Heights Road, Suite G
Moon Township, PA 15108

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5
FILED
SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DRMC Primary Care Associates
145 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian for DRMC Primary Care Associates, twenty (20) days from the service
of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison
& Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
directed to bring to this deposition copies of any and all documents as set forth on the attached
Subpoena.

DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON/DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Primary Care Associates, 145 Hospital Avenue, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court

Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 29th day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

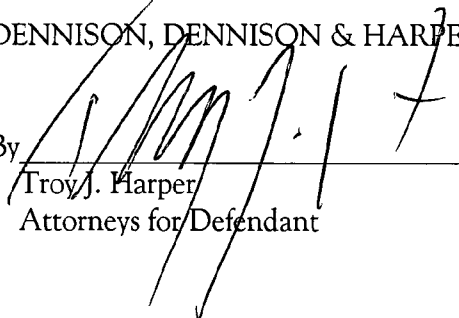
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DRMC Primary Care Associates
145 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5
FILED
M 11:05 AM
SEP 30 2010
cc
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
parents, THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
P&G Physical Therapy
100 Meadow Lane, Suite 2
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian for P&G Physical Therapy, twenty (20) days from the service of this
Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison &
Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for
the purpose of copying records only. No attorneys are expected to be present. Deponent is
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DENNISON DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, P&G Physical Therapy, 100 Meadow Lane, Suite 2, DuBois,
PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See Exhibit A attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court

Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Any and all medical records in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, therapy records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 29th day of September, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

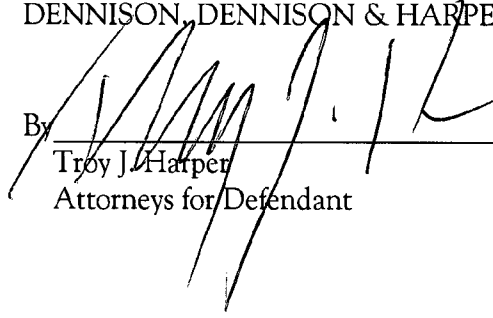
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
P&G Physical Therapy
100 Meadow Lane, Suite 2
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
parents, TOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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FILED No
SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
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SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

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*

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*

* Civil Action - Law

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*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
Outpatient Physical Therapy
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Irene J. Wilkinson, will take the deposition
of the Records Custodian for DuBois Regional Medical Center - Outpatient Physical Therapy,
twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the
law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

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COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

*

Irene J. Wilkinson
Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center - Outpatient Physical
Therapy, 100 Hospital (Name of Person or Entity)
Avenue, DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

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this subpoena, together with the certificate of compliance, to the party making this request at the
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

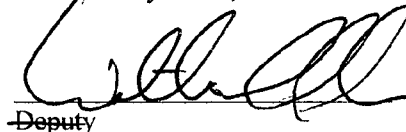
SUPREME COURT ID # 74753

ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



~~Deputy~~

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

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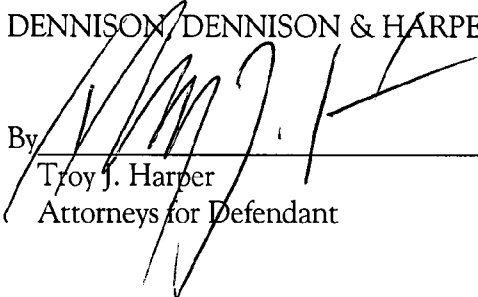
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
Outpatient Physical Therapy
100 Hospital Avenue
DuBois, PA 15801

DENNISON DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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WALLACE; and THOMAS WALLACE and
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own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

5
FILED

SEP 30 2010

William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
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* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Magnetic Imaging Center
104 Hospital Avenue
DuBois, PA 15801

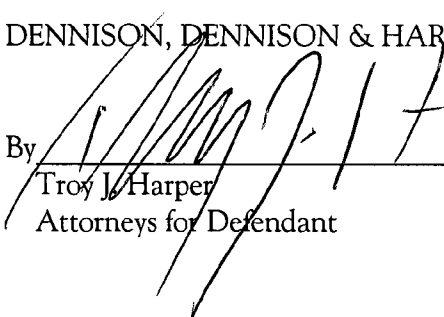
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Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
Thomas Wallace
Sharon Wallace
Plaintiff(s)

*

Vs.

*

No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Magnetic Imaging Center, 104 Hospital Avenue, DuBois,
PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
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See attached Exhibit A

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, October 14, 2009
Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

MRI Cervical Spine taken on 6/27/2006

CERTIFICATE OF SERVICE

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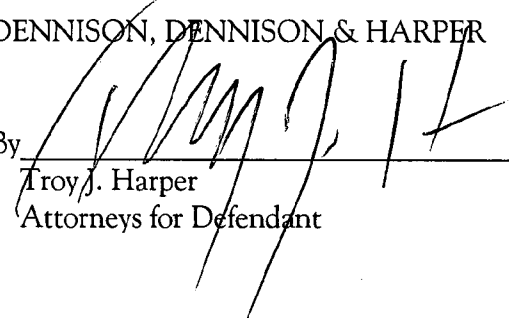
Jeffrey Lundy, Esq.
219 East Union Street
P. O. Box 74
Punxsutawney, PA 15767

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DuBois Magnetic Imaging Center
104 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her
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Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Deposition
for the Purpose of Copying Records Only

Filed on behalf of: Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

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SEP 30 2010
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her
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* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Action - Law

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*

* Number 2007 - 941 C.D.

NOTICE OF DEPOSITION FOR THE PURPOSE
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TO: Records Custodian
DuBois Regional Medical Center
Imaging Department
100 Hospital Avenue
DuBois, PA 15801

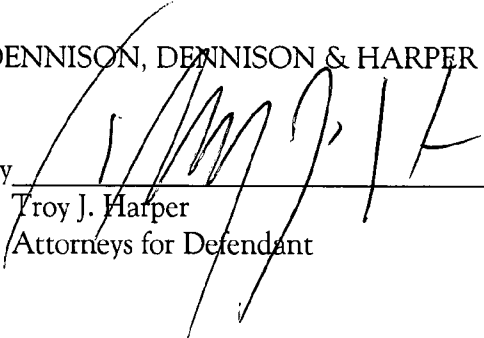
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DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Hannah Wallace
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Sharon Wallace
Plaintiff(s)

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Vs.

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No. 2007-00941-CD

Irene J. Wilkinson
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
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TO: Records Custodian, DuBois Regional Medical Center, Imaging Department, 100
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PA 15801

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TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Defendant

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

DATE: Wednesday, October 14, 2009
Seal of the Court

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

EXHIBIT A

Originals or copies of the following imaging films in your possession for Thomas Wallace, DOB: 4/13/1960, SSN: 182-54-3746:

1. 7/17/2005 X-rays of cervical spine
2. 7/17/2005 X-rays of lumbar spine
3. 9/30/2005 CT of the head
4. 3/29/2007 CT of cervical spine
5. 3/29/2007 Cervical myelogram
6. 3/25/2008 X-ray of lumbar spine

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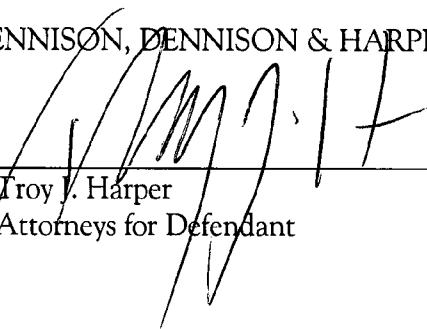
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DuBois Regional Medical Center
Imaging Department
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

CA

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

Hannah Wallace, a Minor, by : 07-941 CD
her parents Thomas Wallace and :
Sharon Wallace and Thomas :
Wallace, and Sharon Wallace : Pleading: Petition to Settle Minors
v. : Claim
Irene J. Wilkinson : Counsel of Record:
LUKEHART, LUNDY & LUNDY
Jeffrey Lundy, Esquire
Supreme Court I.D. 25823
219 E. Union Street
PO Box 74
Punxsutawney, PA 15767
(814)938-8110

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\$ DEC 05 2011
William A. Shaw
Prothonotary/Clerk of Courts
Lundy
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IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

Hannah Wallace, a Minor, by : 07-941 CD
her parents Thomas Wallace and :
Sharon Wallace and Thomas : Pleading: Petition to Settle Minors
Wallace, and Sharon Wallace : Claim
v. :
Irene J. Wilkinson :
:
:

PETITION TO SETTLE AND
COMPROMISE A MINOR'S CLAIM

AND NOW comes Jeffrey Lundy, Esq. and presents the following Petition
to Settle a Minors Claim:

1. Petitioners are Thomas and Sharon Wallace, parents of Hannah Wallace, a minor born on January 14, 1996, and presently 15 years old.
2. On July 16, 2005, Hannah was involved in an automobile accident on State Route 322 wherein she was a passenger and as more fully described in the Plaintiffs' Complaint.
3. As a result of said accident, Hannah alleged in paragraphs 10 through 14 of the Complaint filed in this matter that she suffered certain injuries, mainly bruises and trauma to her joints, and received certain treatments.
4. The injuries were treated at DuBois Regional Medical Center and Advanced Chiropractic, and all medical bills were paid by her insurance carrier with no right of subrogation.

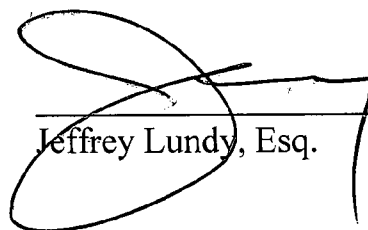
5. As a result of negotiations, settlement has been reached with Defendant's insurance carrier as to Hannah's claims in the amount of Five Thousand Dollars (\$5,000.00), and a copy of the proposed General Full Release is attached hereto as Exhibit A.

6. Counsel for Plaintiffs and Hannah's parents believe this is a fair and reasonable settlement as Hannah fully recovered from her injuries and said offer is consistent with similar settlements of such injuries.

7. Petitioners entered into an agreement for legal services on a Contingent Fee basis providing for one third (1/3) fee (\$1,666.66) and had expenses of DMRC records \$17.48. The balance due Hannah Wallace to be placed in a blocked escrowed federally insured account until she is 18 years of age is: Three Thousand Three Hundred Fifteen Dollars and Eighty-Six Cents (\$3,315.86.)

WHEREFORE, your Petitioners request that the attached Order of Court be executed granting them authority to settle the claim in accordance with the provisions provided herein and that the Petitioners have the authority to execute a full and complete release of all claims.

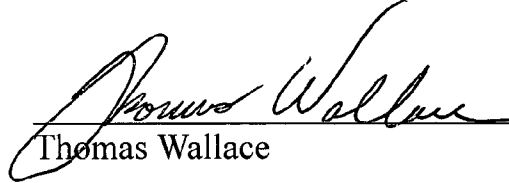
Respectfully Submitted,





Jeffrey Lundy, Esq.

VERIFICATION

**We verify that the statements made in this Petition are true and correct.
We understand that false statements herein are subject to the penalties of 18
Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.**


Thomas Wallace


Sharon Wallace


Hannah Wallace, a minor

GENERAL FULL RELEASE

KNOW ALL PERSONS BY THESE PRESENTS, that we, **THOMAS WALLACE and SHARON WALLACE, as parents and natural guardians of HANNAH WALLACE, a minor**, (Releasors), for and in consideration of the sum of **FIVE THOUSAND AND 00/100 DOLLARS (\$5,000.00)**, in hand paid to us, the receipt and sufficiency whereof is hereby acknowledged, on behalf of the minor, Hannah Wallace, do hereby remise, release, quitclaim, and forever discharge **IRENE J. WILKINSON**, (Releasee), and by these presents for ourselves, the minor child, our heirs, executors, administrators, agents, assigns and subrogees, do remise, release, quitclaim and forever discharge the said **IRENE J. WILKINSON**, her heirs, executors, administrators, estates, assigns and insurers and all other persons, firms, or corporations, and every of them, liable or who might be claimed to be liable, none of whom admit any liability to the undersigned but expressly deny any liability, of and from all manner of action and actions, cause and causes of actions, suits, joinders for sole liability, contribution, indemnity or otherwise, sum and sums of money, accounts, specialties, covenants, contracts, agreements, promises, variances, damages, judgments, punitive damages, extents, executions, claims, and demands whatsoever, in law or in equity, or otherwise howsoever which against the said **IRENE J. WILKINSON**, the minor child ever had, now has, or the minor child, our heirs, executors, administrators, assigns, or subrogees hereinafter can, shall or may have against **IRENE J. WILKINSON**, and especially on account or in any way arising out of a **two-vehicle accident that occurred on July 16, 2005, at the intersection of United States Highway Route 322 and State Route 410 in or near the Village of Luthersburg, Clearfield County, Pennsylvania.**

The undersigned hereby agree by these presents for themselves and the minor child, their heirs, executors, administrators, agents, assigns and subrogees, to satisfy any and all liability, charges, fees, costs, interest or other sums for any unpaid expenses and/or valid liens and/or subrogation claims that have been asserted and/or which could be or may be asserted for reimbursement of any medical benefits or other benefits provided to the undersigned or the minor child by a third party including any insurance carrier, workman's compensation carrier, government agencies, and/or private or public sources as a result of the injuries claimed as a result of the above-mentioned accident including but not limited to any payments made by any insurance carrier/provider, Medicare, Medicaid, and/or the Pennsylvania Department of Public Welfare. Additionally, the undersigned hereby agree by these presents for themselves and the minor child, their heirs, executors, administrators, agents, assigns and subrogees, to indemnify and save forever harmless the Releasee from and against any and all such liens, claims, demands or actions, known or unknown, made against the Releasee or her insurers and the law firm of

Dennison, Dennison & Harper by any person or entity on account of or in any manner related to or arising from the above-mentioned accident.

Releasors certify compliance with the Pennsylvania Insurance Proceeds Intercept Act, Act 109 of 2006, 23 Pa.C.S.A. §4308.1, and Releasors hereby agrees by these presents for themselves and the minor child, their heirs, executors, administrators, agents, assigns and subrogees, to indemnify and save forever harmless from and against any claim under the Act against the Releasee, her insurers and the law firm of Dennison, Dennison & Harper.

The undersigned hereby agree by these presents for themselves and the minor child, their heirs, executors, administrators, agents, assigns and subrogees that they will not join nor attempt to join the Releasee, her heirs, assigns, executors, administrators, estates, agents and insurers, in any action that may be brought against the Releasors arising out of the above-mentioned accident.

It is understood that this Release and any payment made pursuant thereto is a compromise settlement and not an admission of legal liability by the Releasee and is not to be construed as such, the Releasee expressly denying said liability and this settlement being made merely to avoid the expenses of litigation.

We, the undersigned, have carefully and completely read the foregoing Release and know the contents thereof, and we are signing the same voluntarily as our own free act for the purpose of making a full and final compromise, adjustment and settlement of any and all claims, disputed or otherwise, and for the express purpose of precluding forever any further or additional claims arising out of the aforesaid accident. We understand that the damages and injuries sustained therefrom may be uncertain and indefinite, and that in making this release and agreement, it is understood and agreed that we rely upon our own beliefs and knowledge and that of individuals whom we may have consulted as to the nature, extent and duration of the damages and injuries. I further intend to be legally bound by the promises herein contained.

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or a statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties.

IN WITNESS WHEREOF, and intending to be legally bound, the undersigned has caused this Release to be executed as of the ____ day of _____, 2010.

Thomas Wallace, as parent and natural guardian of
Hannah Wallace, a minor

Sharon Wallace, as parent and natural guardian of
Hannah Wallace, a minor

COMMONWEALTH OF PENNSYLVANIA,

COUNTY OF _____ ss:

On this, the _____ day of _____, 2010, before me, the undersigned officer, personally appeared Thomas Wallace, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

Notary Public

COMMONWEALTH OF PENNSYLVANIA,

COUNTY OF _____ ss:

On this, the _____ day of _____, 2010, before me, the undersigned officer, personally appeared Sharon Wallace, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

Notary Public

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

	:	07-941 CD
Hannah Wallace, a Minor, by	:	
her parents Thomas Wallace and	:	
Sharon Wallace and Thomas	:	Pleading: Petition to Settle Minors
Wallace, and Sharon Wallace	:	Claim
v.	:	
Irene J. Wilkinson	:	
	:	

ORDER OF COURT

AND NOW, this _____ day of _____, 2011, upon presentation of a
Petition to Settle Minor's Claim;

IT IS HEREBY ORDERED AND DECREED as follows:

1. The Court hereby finds that the proposed settlement is fair, equitable and is in the best interest of Hannah Wallace, the minor child. As such, the settlement in compromise of the minor's action for the sum of Five Thousand and 00/100 Dollars (\$5,000.00) is approved.
2. The Court hereby finds that the Fee Agreement entered into between the Petitioners and counsel for the Plaintiff, to wit, a one-third (1/3) contingency fee and reimbursement of expenses, to be fair and reasonable.
3. The said Five Thousand and 00/100 Dollars (\$5,000.00) shall be paid and distributed as follows:

A. To Jeffrey Lundy, Esq.: Fee Agreement Proceeds of \$1,666.66 and expenses of \$17.48.

B. To Thomas Wallace and Sharon Wallace, as parents of Hannah Wallace: The sum of Three Thousand Three Hundred Fifteen Dollars and 86/100 (\$3,315.86.) which shall be deposited into an interest bearing account at a Federally Insured Deposit Bank for the sole benefit and in the name of Hannah Wallace, a minor, to be marked "Not to be redeemed except for renewal in its entirety nor to be withdrawn, assigned, negotiated or otherwise alienated before January 14, 2014, except upon order of a court of competent jurisdiction." Petitioners shall provide the Court with evidence of the aforementioned deposit upon completion of the same.

4. The Petitioners are authorized and directed to sign and deliver to counsel for the Defendant the General Full Release in the form set forth in Exhibit A attached to the Petition and to file a Praecipe to Discontinue the claims of Hannah Wallace.

BY THE COURT,

J.

CA

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

Hannah Wallace, a Minor, et al.
Plaintiff(s)

vs.

Irene Wilkinson
Defendant(s)

NO. 07 - 941 -CD

(Docket Number is assigned by
Prothonotary when case is filed)

SCHEDULING ORDER

AND NOW, this 7th day of December 2011, it hereby ORDERED
that a Hearing for Petition to Settle Minor's Claim in the above captioned
matter shall be and is hereby scheduled for January 13, 2012 at
1:30 ~~AM~~ (PM) in Courtroom No. 1, of the Clearfield County
Courthouse, Clearfield, Pennsylvania.

1/2 (hour) day is reserved for this hearing.

BY THE COURT:

Judith J. Cunningham
JUDGE

FILED
DEC 07 2011
William A. Shaw
Prothonotary/Clerk of Courts
Atty Lundy

FILED

DEC 07 2011

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 12/7/11

☒ You are responsible for serving all appropriate parties.

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

☐ Plaintiff(s) ☐ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) ☐ Defendant(s) Attorney

☐ Partial Instructions:

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

Hannah Wallace, a Minor, by : 07-941 CD
her parents Thomas Wallace and :
Sharon Wallace and Thomas :
Wallace, and Sharon Wallace : Pleading: Petition to Settle Minors
v. : Claim
Irene J. Wilkinson :
:
:
:
:
:
:
:
:
:

FILED 2cc
JAN 13 2012 Atty Lundy
(will serve)
William A. Shaw
Prothonotary/Clerk of Courts CW

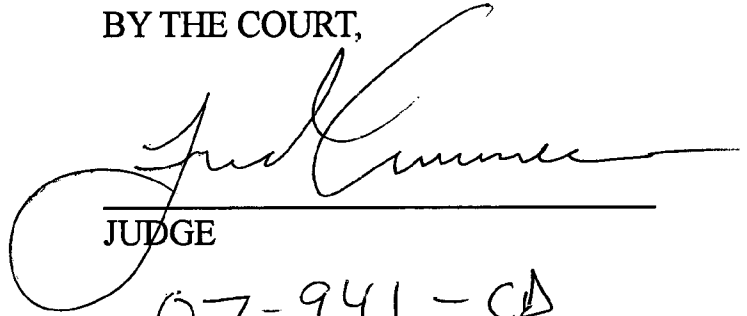
ORDER OF COURT

AND NOW, this 13 day of January, ^{2012 FJA} ~~2011~~, upon presentation of a
Petition, it is hereby ORDERED AND DECREED that Petitioners are hereby
authorized to execute a full and complete release for the sum Five Thousand
(\$5,000.00) Dollars, copy attached to the Petition, with disbursement as follows:

- A. Jeffrey Lundy, Esq. Fee Agreement Proceeds of \$1,666.66 and expenses of \$17.48.
- B. Three Thousand Three Hundred Fifteen Dollars and Eighty-Six Cents (\$3,315.86.) to be placed into a Federally Insured Deposit Bank with an office in Clearfield County, Pennsylvania, in the name of Hannah Wallace, a minor, providing no withdraws unless by Order of Court and that the account be released to Hannah Wallace when she reaches the age of Eighteen Years.

Wallace v Wilkinson

BY THE COURT,

A large, stylized handwritten signature in black ink, written over a horizontal line.

JUDGE

07-941-CD

1/13/12

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

FILED

APR 10 2012

W/10:30/L
William A. Shaw
Prothonotary/Clerk of Courts
No 9/L

Hannah Wallace, a Minor, by
her parents Thomas Wallace and
Sharon Wallace and Thomas
Wallace, and Sharon Wallace
v.
Irene J. Wilkinson

: 07-941 CD
:
: Pleading: Petition to Discontinue Discourt. to
:
: Filed on Behalf of: Hannah Wallace AS TO
:
: Counsel of Record: H. WALLACE
: LUKEHART, LUNDY & LUNDY
: Jeffrey Lundy, Esquire
: Supreme Court I.D. 25823
: 219 E. Union Street
: PO Box 74
: Punxsutawney, PA 15767
: (814)938-8110

Hannah Wallace, a Minor, by
her parents Thomas Wallace and
Sharon Wallace and Thomas
Wallace, and Sharon Wallace
v.
Irene J. Wilkinson

Case No. 07-941 CD

Jeffrey Lundy, Esquire

FILED
APR 10 2012
William A. Shaw
Notary Public/Clerk of Courts

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

CIVIL DIVISION

**Hannah Wallace
Thomas Wallace
Sharon Wallace**

**Vs.
Irene J. Wilkinson**

No. 2007-00941-CD

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 April 10, 2012, marked:

Discontinued as to Plaintiff Hannah Wallace, a Minor, ONLY.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 10th day of April A.D. 2012.

William A. Shaw, Prothonotary

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CIVIL TRIAL LISTING - CERTIFICATE OF READINESS

FORM MUST BE FILED WITH: CLEARFIELD COUNTY PROTHONOTARY
230 EAST MARKET STREET, 1ST FLOOR
CLEARFIELD, PA 16830

DATE PRESENTED: 9/10/2012 CASE NUMBER: 2007-941 C.D.

DATE ORIGINAL COMPLAINT WAS FILED: 2007

TYPE OF TRIAL REQUESTED: ESTIMATED LENGTH OF TRIAL:
() JURY () NON-JURY
(X) ARBITRATION (case cannot exceed \$~~20,000~~^{25,000}) 3 DAY(S) (or) 3 HOURS

PLAINTIFF(S):

Thomas Wallace and Sharon Wallace

DEFENDANT(S):

Irene J. Wilkinson

Check (✓) if Defendant is a Minor

()

ADDITIONAL DEFENDANT(S):

FILED

SEP 19 2012

William A. Shaw
Prothonotary/Clerk of Court

JURY DEMAND FILED BY:

DATE JURY DEMAND FILED: OK

N/A

AMOUNT AT ISSUE: \$ < 35,000.00

CONSOLIDATION? () YES (X) NO

IF YES, DATE CONSOLIDATION ORDERED: _____

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE ARBITRATION / TRIAL LIST.

I certify that all discovery in the case has been completed; all necessary parties and witnesses are available; serious settlement negotiations have been conducted; the case is ready in all respects for trial or arbitration, and a copy of this Certificate has been served upon all counsel of record and upon all parties of record who are not represented by counsel:

SIGNATURE

Jeffrey Lundy 219 E. Union St., Punxsutawney, PA 15767 (814) 938-8110
FOR THE PLAINTIFF(S) ADDRESS TELEPHONE #

Troy J. Harper 293 Main Street, Brookville, PA 15825 (814) 849-8316
FOR THE DEFENDANT(S) ADDRESS TELEPHONE #

FOR ADDITIONAL DEFENDANT(S)

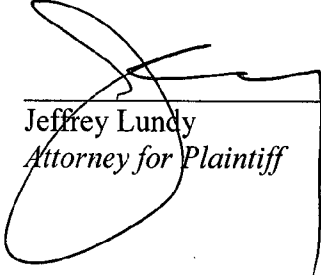
ADDRESS

TELEPHONE #

CERTIFICATE OF SERVICE

I, JEFFREY LUNDY, Attorney for Plaintiff, hereby certify that on the 10th day of September, 2012, a true and correct copy of the foregoing **Certificate of Readiness** was sent via first-class mail, postage prepaid to the following:

Troy J. Harper, Esquire
293 Main Street
Brookville, PA 15825



Jeffrey Lundy
Attorney for Plaintiff

RECEIVED
SEP 19 2012
COURT OF APPEALS
CLERK'S OFFICE

FILED

SEP 19 2012

William A. Shaw
Prothonotary/Clerk of Courts

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

HANNAH WALLACE, a minor, by her parents
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE

Plaintiffs,

vs.

IRENE J. WILKINSON

Defendant,

NO. 2007-0941-CD

FILED

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66

William A. Shaw
Prothonotary/Clerk of Courts

ORDER

NOW, this 5th day of November, 2012, it is the ORDER of the

Court that the above-captioned matter is scheduled for Arbitration on **Thursday, November 29, 2012 at 9:00 A.M.** in the Conference/Hearing Room No. 3, 2nd Floor, Clearfield County Courthouse, Clearfield, PA. The following have been appointed as Arbitrators:

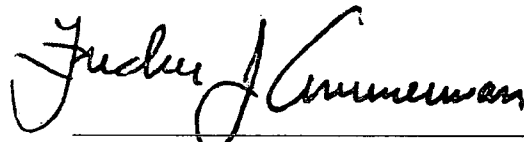
David J. Hopkins, Esquire, Chairman

Frederick M. Neiswender, Esquire

David R. Thompson, Esquire

Pursuant to Local Rule 1306A, you must submit your Pre-Trial Statement seven (7) days prior to the scheduled Arbitration. **The original should be forwarded to the Court Administrator's Office and copies to opposing counsel and each member of the Board of Arbitrators.** For your convenience, a Pre-Trial (Arbitration) Memorandum Instruction Form is enclosed as well as a copy of said Local Rule of Court.

BY THE COURT:



FREDRIC J. AMMERMAN
PRESIDENT JUDGE

FILED

NOV 07 2012

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of Intent to
Introduce Documents Pursuant
to Pa.R.C.P. 1305

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
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*

* Civil Action - Law

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*
*

* Number 2007 - 941 C.D.

**NOTICE OF INTENT TO INTRODUCE DOCUMENTS PURSUANT TO
PA.R.C.P. 1305**

TO: Thomas Wallace and Sharon Wallace
c/o Jeffrey Lundy, Esq.
Lundy & Lundy
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767

AND NOW, comes the Defendant, IRENE J. WILKINSON, by her attorneys, Dennison,
Dennison & Harper, who give notice to the Plaintiffs of the intent to introduce some or all of the
following documents into evidence pursuant to Pa.R.C.P. 1305 of the Pennsylvania Rules of
Civil Procedure:

1. The Plaintiff, Thomas Wallace's, pre- and postaccident medical records produced in
discovery including all records secured through subpoenas. As the same have been previously
produced in discovery, they are not duplicated herein.

2. Independent Medical Examination Report of Dr. James L. Cosgrove dated October 31, 2011, a copy of which is attached hereto.

3. Curriculum Vitae of Dr. James L. Cosgrove, a copy of which is attached hereto.

4. Commonwealth of Pennsylvania Accident Report for Incident Number C04-0831767.

As the same has been previously produced in discovery it is not duplicated herein.

DENNISON, DENNISON & HARPER

By 

Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Intent to Introduce Documents Pursuant to Pa.R.C.P. 1305 was served on the 6th day of November, 2012 by United States Mail, First Class, Postage Prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lundy & Lundy
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Amended Notice of Intent
to Introduce Documents Pursuant
to Pa.R.C.P. 1305

Filed on behalf of: Defendant

Counsel of Record for this Party:

Troy J. Harper

Supreme Court Number: 74753

John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316

FILED No
m/12-29302 CC
NOV 09 2012 GL
William A. Shaw
Prothonotary/Clerk of Courts

HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

*

*

*

*

* Civil Action - Law

*

*

*

* Number 2007 - 941 C.D.

**AMENDED NOTICE OF INTENT TO INTRODUCE DOCUMENTS
PURSUANT TO PA.R.C.P. 1305**

TO: Thomas Wallace and Sharon Wallace
c/o Jeffrey Lundy, Esq.
Lundy & Lundy
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767

AND NOW, comes the Defendant, IRENE J. WILKINSON, by her attorneys, Dennison,
Dennison & Harper, who file the following Amended Notice of Intent to Introduce Documents
Pursuant to Pa.R.C.P. 1305:

1. On or about November 6, 2012, the Defendant, Irene J. Wilkinson, by and through her
attorneys filed a Notice of Intent to Introduce Documents Pursuant to Pa.R.C.P. 1305.

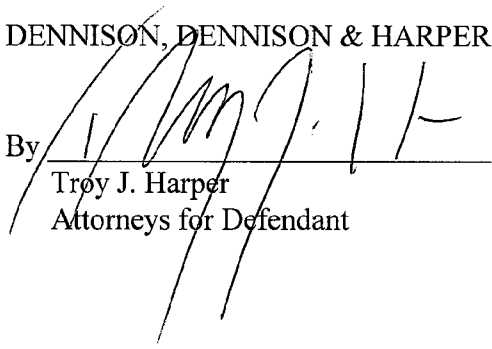
2. Said Notice of Intent to Introduce Documents Pursuant to Pa.R.C.P. 1305 set forth that
a copy of the Independent Medical Examination Report of Dr. James L. Cosgrove dated October
31, 2011 and the Curriculum Vitae of Dr. James L. Cosgrove were attached thereto.

3. After the Notice of Intent to Introduce Documents Pursuant to Pa.R.C.P. 1305 was filed it was discovered the aforementioned Report and Curriculum Vitae were not attached to the Notice.

4. Attached here to are copies of the aforementioned Report and Curriculum Vitae.

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant



Tri Rivers

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Michael W. Weiss, M.D.
D. Kelly Agnew, M.D.
William D. Abraham, M.D.
Trenton M. Gause, M.D.
Thomas S. Muzzonigro, M.D.
Robert L. Waltrip, M.D.
S. Joshua Szabo, M.D.
H. James Pfoeffle, M.D., Ph.D.

Physical Medicine & Rehabilitation

James L. Cosgrove, M.D.
Judith H. Esman, M.D.
Edward D. Reidy, M.D.

Neurosurgery

J. William Bookwalter III, M.D.
Francis T. Ferraro, M.D.
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Pulmonary Medicine

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Internal Medicine

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Oral & Maxillofacial Surgery

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Daniel J. Cole, M.D.

Podiatry

Steven A. Conner, D.P.M., J.D.

Cardiology

Kenneth C. Huber, M.D.

Consulting Services Manager

LuAnn Dugan

Chief Executive Officer

Robyn L. Beckwith, M.B.A.

October 31, 2011

Troy Harper

DENNISON DENNISON & HARPER

293 Main Street

Brookville, PA 15825

RE: Thomas Wallace

Dear Mr. Harper:

A. Medical Records:

1. DuBois Regional Medical Center: operative report, maxillary, 08/07/03; operative report, mandibular, 12/20/03; emergency room visits x 9, 07/01/04 through 11/28/09; myelogram procedure note, 03/29/07.
2. Jeremy Brubaker, D.C., 06/12/05 through 09/24/07.
3. Aaron Peters, D.C., 07/05/05 through 12/12/05.
4. Robert Usaitis, M.D., 07/25/05 through 04/06/06.
5. M. Etta Dietz, CRNP, DRMC Neurology, 12/14/05 through 07/10/06.
6. Steve Pagano, Jr., D.C., peer review, 12/28/05.
7. Robert Cohen, D.O., peer review, 03/02/06.
8. P&G Physical Therapy, 04/12/06 through 07/12/06.
9. P. Joseph Valigorsky, II, M.D., 02/09/07 through 10/31/07.
10. David Watson, M.D., 07/20/07 and 01/25/08.
11. DuBois Regional Medical Center, Physical Therapy, 11/23/09 through 12/14/09.
12. Legal documents including police report/vehicle photographs, civil complaint, deposition of Mr. Wallace, 06/29/09.

B. Diagnostic Study Reports:

1. 07/30/98 Stress Study.
2. 08/30/01 Holter monitor.

NOV 21 2011

Troy Harper
RE: Thomas Wallace
October 31, 2011
Page 2

3. 07/17/05 X-ray cervical and lumbosacral spine.
4. 09/30/05 CT scan of the head.
5. 06/14/06 EMG/nerve conduction study, bilateral upper extremities.
6. 06/27/06 MRI of the cervical spine.
7. 09/04/06 X-ray of the right elbow.
8. 03/29/07 CT myelogram of the cervical spine.
9. 04/14/08 Chest x-ray.
10. 04/27/07 Pulmonary function test.
11. 05/10/07 Cardiolite Stress Study.
12. 07/30/07 X-ray of the left foot.
13. 01/08/08 X-ray of the right knee, left shoulder, left ankle, left knee and right ankle.
14. 03/25/08 X-ray of the lumbosacral spine.
15. 12/24/08 CT scan of the abdomen and pelvis.
16. 01/27/09 X-ray of the abdomen.
17. 11/10/09 X-ray of the cervical spine.
18. 11/30/09 X-ray of the lumbosacral spine.
19. 03/08/10 X-ray of the left ankle.

CHIEF COMPLAINT: Right sided neck pain with severe intermittent headache.

HISTORY OF PRESENT ILLNESS: Mr. Wallace is a 51-year-old right-hand dominant gentleman who presents with a chief complaint of right-sided neck pain associated with a motor vehicle accident of July 16, 2005. He had had some right upper extremity pain initially, but he informs me that this has improved dramatically with virtually no pain at this time. He still does get occasional headache pain associated with a more chronic neck pain. Overall, he feels he is "90%" better.

Mr. Wallace was driving his 1996 GMC pickup truck when an oncoming vehicle turned in front of him. He experienced essentially a head on collision. His airbag did not deploy. The police report describes

Troy Harper
RE: Thomas Wallace
October 31, 2011
Page 3

the damage as minor to Mr. Wallace's vehicle. The report indicates Mr. Wallace was not injured. His daughter was traveling with him and was transported to the hospital apparently as a precaution. By report, Mr. Wallace traveled with her to the hospital though he was not evaluated.

Per the civil complaint, Mr. Wallace alleges injuries to the neck and low back (cervicalgia, cervical sprain and strain, lumbar sprain and strain, right sided neck pain, bilateral shoulder pain, left sided sciatic pain, headaches, concussion, postconcussion syndrome and postconcussion headaches, depression). Mr. Wallace does have a preexisting history of kidney stones, gout, sleep apnea and a more remote history of fractured collarbone in 1963. He also had a head injury at age 10 while playing football. He is left-hand dominant.

Preexisting records begin in 1998 referable to a cardiac stress test which shows focal ischemic changes in the anterior lateral segment of the left ventricle. Echocardiography done in 1998 revealed normal left ventricular size and systolic function.

Holter monitor of August 30, 2001 revealed a normal sinus rhythm with no ectopy.

In 2003 he underwent maxillary osteotomy. Post diagnosis was that of maxillary deficiency. Hospital course was unremarkable.

On December 10, 2003 he had an additional procedure to his mandible.

In 2004 he had probable food poisoning treated at DuBois Regional Medical Center.

In 2005 the first record is noted from Dr. Brubaker, chiropractor with complaints of migraine headache and stiff neck of ten years duration, getting worse

Troy Harper
RE: Thomas Wallace
October 31, 2011
Page 4

recently. Dr. Brubaker's impression was that of degenerative disc disease with loss of the normal cervical curve and subluxation complex. He was seen for five visits and apparently was discharged "feeling great."

On July 5, 2005 he was seen by Dr. Peters, a chiropractor, for migraine headache, neck pain and left sciatic pain. The pain was rated at 5/10 out of 10. He has had a decreased frequency of the headache. Dr. Peters' diagnosis was that of positive cervical sprain/strain, cervical and thoracic muscle spasms, cervical segmental dysfunction, thoracic pain. Treatments were rendered through July 14, 2005.

There then is the motor vehicle accident in question of July 16, 2005. The first medical evaluation is at DuBois Regional Medical Center on July 17, 2005 with complaints of mild neck and low back pain. Degenerative arthritic changes were seen at C5 through C7 with degenerative disc phenomena at C6-C7. Moist heat, Advil/Motrin were recommended.

The following day on July 18, 2005, he returned to see Dr. Peters and noted increased neck pain and spasm. He was also complaining of migraine headache which was "constant." History was of pain that increased the day following the accident when Mr. Wallace awoke. Assessment was that of cervical strain and sprain, cervical and thoracic muscle spasm, thoracic pain and lumbar sprain and strain. A new treatment plan was formulated including electrical muscle stimulation, myofascial release, soft tissue mobilization. Mr. Wallace then underwent thirty-four visits between July and December of 2005 with a variety of pain modality techniques primarily for neck and headache pain. The neck pain appeared to be the primary remaining symptom.

In December of 2005 he stated, "I feel like I am almost back to my old self again."

Troy Harper
RE: Thomas Wallace
October 31, 2011
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During this timeframe, Mr. Wallace was evaluated by Dr. Usaitis, his primary care physician. Diagnosis remained much the same of chronic cervical strain - improving, cephalgia. There was also some associated diagnosis of right otitis externa and tinea cruris. He was treated with Esgic Plus. CT scan of the head of September 30, 2005 was read as normal.

Because of persistent pain, he was referred to Dr. Kratz/Ms. Dietz of neurology. Records were that Mr. Wallace had undergone chiropractic and physical therapy treatments with improvement. In the beginning, his headaches were on the right side of the neck radiating up behind the eye. There was increased pain with twisting and turning of his head. He had photophobia and phonophobia but without nausea. Of note is that Mr. Wallace had used Imitrex in the past with variable effectiveness. The prior use of Imitrex was associated with headache pain and possibly associated with a head injury at age 11. There is also a history of intermittent low back pain with some left lower extremity/sciatic type complaints. At that time Mr. Wallace was employed as a welder. He had been off work from approximately July 16, 2005 until mid September of that year. At the time of Dr. Kratz' evaluation, Mr. Wallace was working full time. Neurologic examination was intact with normal sensation, normal motor strength, normal reflexes. No central nervous system abnormality was noted. He did have positive sway on Romberg without pronator drift. Impression was that of postconcussive syndrome with persistent headache, some difficulty with memory and concentration. Cymbalta was prescribed. It was also recommended continuation of over the counter Excedrin with Zebutal. Additional diagnosis was that of neck sprain and spasm. Continued pain complaints were noted with Cymbalta. It was recommended to wean from the Cymbalta and begin Elavil.

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On December 28, 2005 Dr. Pagano, D.C. performed a peer review. At that time, Mr. Wallace was receiving treatment one time per week by Dr. Peters. Dr. Peters opined that symptoms prior to the date of injury were most likely degenerative changes as evidence on radiographic evaluation. Dr. Peters opined that the motor vehicle accident greatly exacerbated the symptoms. The low back pain was a new complaint solely related to the motor vehicle accident in question. Dr. Pagano concluded that treatment rendered by Dr. Peters was reasonable and necessary up to but not beyond December 12, 2005 (twenty-one weeks).

Because of persistent pain, Mr. Wallace did call Dr. Kratz' office on January 10, 2006 (headache).

Mr. Wallace was seen by Ms. Dietz on January 16, 2006. Lortab was working well for severe headaches. Headache diary was being kept. There were also some complaints of visual and also tinnitus. Elavil was increased to 50 mg PO q hs. Flexeril was recommended to be held while he was taking Elavil.

Mr. Wallace returned to see Dr. Usaitis on January 31, 2006 voicing mild depression as well as some headache. Lexapro was restarted. Gout appeared to be stable.

On February 28, 2006, Ms. Dietz noted the headaches were less frequent and less intense on Lexapro. He had developed some associated side effects and difficulty urinating. He was also complaining of some forgetfulness. Elavil was advised as was Lexapro. Lortab was refilled. Headache was bothering him less as was neck pain.

On March 2, 2006, Dr. Cohen performed a peer review referable to Dr. Usaitis. Dr. Cohen concluded that treatment had been reasonable and necessary through

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December 12, 2005 (office visits and referral to physical therapy). Frequency and duration of care was reasonable and necessary.

Because of persistent pain, Mr. Wallace phoned Ms. Dietz indicating that he had weaned off of his Amitriptyline. Inderal and hydrocodone was being used for headache pain control.

On March 30, 2006 Mr. Wallace was re-evaluated by Ms. Dietz. Inderal was reported as being helpful in taking the edge off the headache pain. Lexapro was discontinued and it was recommended a trial of Effexor. Ms. Dietz doubted the headaches were due to arsenic poisoning as they were clearly related to the postconcussive syndrome. Heavy metal screen was ordered nevertheless.

On April 2, 2006 Mr. Wallace sought treatment at the DuBois Regional Medical Center due to headache pain. Impression was that of acute headache pain and Lortab was prescribed.

Mr. Wallace phoned Ms. Dietz' office on April 6, 2006 reporting that he was feeling better, but still had complaints of a severe migraine.

On April 6, 2006 Mr. Wallace returned to see Dr. Usaitis reporting daily fatigue, intermittent hot flashes possibly starting associated with the Effexor. The impression was that of postconcussive syndrome and headache. Additional opinions were being recommended.

On April 12, 2006 he was evaluated at physical therapy, P&G Physical Therapy, upon referral by Dr. El-Kadi (neurosurgeon). Headaches, cervical and shoulder pain were the primary presenting complaints. There was also some pain in the right lower lumbar/pelvis/sacroiliac area. He attended

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sixteen visits through July 12, 2006. During this timeframe he had continued to work. Trials of ultrasound and cervical traction were added.

On May 1, 2006 he was evaluated by Ms. Dietz. He was back on Lexapro at this point in time with some benefit from therapy. He was referred to UPMC Neurology for a second opinion. He was placed on a lower dose of Elavil to hopefully diminish side effects.

On June 14, 2006 Mr. Wallace was evaluated by Dr. Hallstrom of physical medicine and rehabilitation. He was complaining of pain in the right thumb as well as left hand numbness. EMG/nerve conduction studies were performed which revealed moderate bilateral carpal tunnel syndrome with some evidence of right ulnar neuropathy across the elbow. No evidence of cervical radiculopathy.

On June 27, 2006 MRI of the cervical spine revealed minimal stenosis and spur formation at the C4-C5 and C6-C7 level. Moderate narrowing of the neural foramina was noted.

On September 4, 2006 he returned to the DuBois Regional Medical Center emergency department due to swelling in the right forearm and elbow. X-rays revealed metallicity opaque foreign body with small osteocartilaginous loose body. Emergency room diagnosis was that of cellulitis. He was placed on Cephalexin.

Mr. Wallace returned to see Dr. Brubaker on September 13, 2006 because of neck and headache pain. By report this had started years ago but had worsened after the motor vehicle accident in question in 2005. He describes a pinching sensation in the left shoulder area with occasional burning involving the left leg. He had some tingling complaints involving the hand.

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Dr. Brubaker's impression was that of subluxation complex with cervical and lumbar area. Forty-three visits then were undertaken through September 24, 2007.

As of November 20, 2007 he had then been reported to have "fair" improvement.

As of December 22, 2006 he was noted that he had "70% relief of his lumbar spine symptoms, but only 10% of his neck."

On February 9, 2007, Mr. Wallace was evaluated by Dr. Valigorsky. Dr. Valigorsky performed occipital blockade with Marcaine and Kenalog. This apparently provided no relief. Prescription medication during this timeframe included hydrocodone/Lortab for headache pain. X-rays of the cervical and lumbar spine were done which revealed spurring of the cervical spine.

He returned to see Dr. Valigorsky on March 15, 2007 with persistent neck pain complaints. Epidural steroid injections since his last visit had only offered three to five days of relief.

Additional epidural steroid injections were done with Kenalog, obtaining very modest benefit.

On March 29, 2007 CT myelogram was performed which revealed spur formation at the C4-C5 level, not as significant at the C5-C6 and C6-C7. There was some posterior spur formation.

Additional hospitalization and testing for cardiac and breathing problems was undertaken in the spring of 2007.

On July 19, 2007, Mr. Wallace was evaluated by Dr. Watson of The Headache Center regarding problems with headaches since age 10 after hitting his head against a gas meter while playing football. Motor

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vehicle accident two years ago had worsened his symptoms. The pain was always present. It was ranging in intensity. Hydrocodone and Elavil were being used regularly. There were additional medications including Excedrin, Lexapro, Colchicine, and AndroGel. General and neurologic examination was normal without any focal deficits. He was placed on a sixteen day course of prednisone as well as Topamax and given Imitrex.

On July 30, 2007 x-ray of the left foot showed no fracture. The reason for this is not entirely clear.

On January 8, 2008 x-ray of the right knee revealed minimal degenerative arthritis of the patellofemoral joint and three knee compartments. X-ray of the left shoulder was unremarkable. Left ankle x-ray showed minimal degenerative changes of the left tibiotalar joint. X-rays of the left knee showed minimal degenerative arthritis at the patellofemoral compartment. X-ray of the right ankle showed only mild degenerative arthritis.

Mr. Wallace returned to see Dr. Watson on January 25, 2008. The handwriting is difficult to read, but he placed on oral supplementation of CoQ10.

On March 13, 2008 he sought treatment at DuBois Medical Regional Center because of neck pain. Impression was that of myofascial cervical sprain and strain. Naprosyn and Norflex were prescribed.

On March 25, 2008 he returned to the emergency department, this time complaining of left lower quadrant pain. Flexeril, Ultram and prednisone were prescribed.

On December 24, 2008 Mr. Wallace had an additional ER visit for left mid back, groin, abdomen and femoral pain. There was a nonobstructive calculus in the left kidney collection system.

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Abdominal x-rays on January 27, 2009 revealed no renal or ureteral calculi.

On November 10, 2009 x-rays of the cervical spine revealed no osseous abnormalities with mild degenerative changes in the lower cervical spine.

On November 23, 2009 physical therapy evaluation at DuBois Regional Medical Center was undertaken at the request of Dr. Katz. Cervical movements revealed significant pulling and sharp pain on the right side of the neck. Current medication included gabapentin and cyclobenzaprine. He had attended five visits through December 14, 2009 with five cancelations and no shows. Treatment included moist heat, electrical stimulation, range of motion and therapeutic exercises. Pain as of the last evaluation was 2/10.

On November 28, 2009 Mr. Wallace sought the care of the emergency room again at DuBois Regional Medical Center. Apparently he was bent over putting a casserole in the oven when he developed increased back pain. It did not radiate.

Additional x-rays were undertaken on January 30, 2009. X-rays of the lumbar spine demonstrated no acute osseous abnormality and on March 8, 2010 left ankle x-ray was normal.

Subsequent to that occasion, Mr. Wallace has provided a deposition on June 29, 2009. It indicated that he was living with his wife and two daughters ages 18 and 13. Both daughters were home schooled.

At the time of the deposition, he was employed by RRI Energy (please note that he has worked for "five different companies" while maintaining the same job). He was working in a variety of professions including mobile maintenance, line department, meter reader, welder and now more recently mechanic.

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Duties were described and appeared to be at least within the medium if not heavy laboring with multiple twist patterns and awkward postures.

Mechanism of injury was described in so far as his vehicle essentially experienced a head on collision. He was the restrained driver in the car. His airbag did not deploy. He did accompany his daughter, Hannah to the emergency department. No initial treatment was sought. He then came under the care of Dr. Peters and Ms. Dietz (Dr. Kratz). He had injections into the cervicoccipital area (occipital nerve as well as the epidural space). These appeared to have been ineffective. No additional treatment with Dr. Valigorsky or Dr. Kratz is anticipated.

Mr. Wallace's description at that time was ongoing headache pain, that would be variable depending on how much physical stress he was under and also neck pain which was worse with his welding hood on or when in precarious places. He was taking ibuprofen and muscle relaxers intermittently.

Following the motor vehicle accident, he had constant mid back pain. This apparently is less problematic, but Mr. Wallace does note increased pain when he attempts to fish, which is his main hobby. Other hobbies include hunting as well as doing some yard work. He describes his home activities to include cutting the grass using a ride on lawn mower. He also indicates that there have been interpersonal difficulties with his wife and he is "not the same person he used to be."

Now he describes his general health as fair. He does have a history of gout. He has not been taking allopurinol or Colchicine at this time. He has a remote history of kidney stones.

At the present time, Mr. Wallace informs me that he is receiving no physical therapy or chiropractic care. He does have a cervical pillow. He does not

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use any sort of collar, neck brace or TENS machine. Overall, he has resumed most of his normal hobbies, but not as vigorously as before. He does like to hunt and fish, but does occasionally have to stop due to increasing neck pain. Overall, he feels he is "90%" better. He did bid on a different job (mechanics) rather than welder and he finds that it is better since he does not have to wear the welder's hood.

He has worked for the same company for some twenty-six years, although it has gone through numerous name changes.

PAST MEDICAL HISTORY: Positive for cholecystectomy and jaw surgery.

DRUG ALLERGIES: None. He is allergic to ragweed.

MEDICATIONS: He takes occasional Aleve or ibuprofen. He has allopurinol but is not taking this regularly.

PHYSICAL EXAMINATION: Mr. Wallace is a stocky, muscular gentleman. He is in no acute distress. Head is normocephalic and atraumatic. Cranial nerves III through XII are intact.

Neck is supple with normal range of motion. He does complain of pain over the right side of the neck, but no radiation either cephalad into the head or distally into the arm. Neck range of motion is well preserved, flexion/extension, side bending and rotation. He does complain of some tightness and soreness on the right side with these maneuvers, however.

Thoracic spine and lumbar spine evidences full flexion/extension without deformity, no pain on palpation. There is normal chest inspiration/expiration throughout.

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Shoulder, elbow, wrist range of motion are entirely within normal limits. There is a very small, what appears to be calcium deposit, over the dorsum of the left hand near the index and CP. This does not affect any joint range of motion and does not appear to be a ganglionic cyst or any sort of tenosynovitis. Please note that Mr. Wallace is a very strong and powerful gentleman. There is no winging of the scapula. He has normal glenohumeral and scapulothoracic movement at the shoulder. There are no abnormalities of the elbow, wrist and finger motion. No ulnar, intrinsic or thenar wasting is appreciated. Peripheral pulsations and Adson's maneuver are normal. Deep tendon reflexes are +1 in the biceps, triceps and brachioradialis.

Grip strength is exceedingly strong at 140 pounds bilaterally at position II.

Functionally he ambulates independently. He has normal and symmetrical arm strength.

ANCILLARY STUDIES: X-rays of the cervical spine, AP, lateral, oblique and lateral flexion and extension reveal there are some degenerative changes seen throughout the cervical spine C4-C5, C5-C6 and C6-C7. There is some slight straightening of the normal cervical lordosis. There is no foraminal encroachment. There is no abnormal movement on flexion/extension.

ASSESSMENT: Cervical strain.

Mr. Wallace gives a history of cervical strain with possible muscle tension headache. He also has an underlying history of cervical spondylosis.

It is my opinion that Mr. Wallace has fully recovered from any injuries he sustained in the motor vehicle accident in question of July 16, 2005. Ongoing pain complaints are wholly consistent with a mild underlying degenerative spondylitic process

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without neurologic consequence. At this point in time, any ongoing symptoms would be most appropriately attributable to the underlying degenerative changes and not due to any sort of residual impairment from the motor vehicle accident in question. There are no objective findings at this time. Mr. Wallace has full and normal range of motion of his cervical spine, no neurologic deficit, no significant musculoskeletal abnormalities. Subjective pain complaints of neck pain with intermittent headache pain wholly consistent with degenerative joint disease and referred muscle tension headaches. Please note that Mr. Wallace does have a preexisting history of both headache and neck pain with active treatment only few days before the MVA.

Overall prognosis is superb. No other additional treatment is necessary. No restrictions in activity level are necessary for any injuries sustained in the motor vehicle accident.

The opinions outlined above are stated within a reasonable degree of medical certainty based on my training and experience as a board certified physical medicine and rehabilitation physician. I hope the information above is useful to you in the management of this matter.

Sincerely,



James L. Cosgrove, M.D.

JLC/mls

Enclosure



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Education

- Cornell University 1974-1978
Ithaca, NY
B.A. Psychology
- George Washington University 1979-1983
Washington, D.C.
MD
- University Health Centers of Pittsburgh 1983-1986
Pittsburgh, PA
Internship: Physical Medicine & Rehabilitation
- University Health Centers of Pittsburgh 1983-1986
Pittsburgh, PA
Residency: Physical Medicine & Rehabilitation

Board Certification

- American Board of Physical Medicine and Rehabilitation 1987
- Subspecialization in Pain Medicine 2003
- American Board of Electrodiagnostic Medicine 1989
- American Board of Independent Medical Examiners 1999
- National Board of Medical Examiners 1984

Work History

- Tri Rivers Physical Medicine & Rehabilitation 5/07 to present
- Physical Medicine & Rehabilitation Experts 9/2003-4/30/07
- Physical Medicine & Rehabilitation Experts-UPMC 9/1997-9/2003
- University of Pittsburgh Medical Center 1997-2003
- Private Practice 1986-1997
- Harmarville Rehabilitation Center 1986-1988

Current Hospital Affiliations

- UPMC Passavant Hospital
- UPMC Passavant Cranberry Hospital
- Western PA Surgery Center

Current Licensure

- Pennsylvania Medical License
- New Mexico Medical License

Appointments

- American Journal of Physical Medicine and Rehabilitation
Reviewer 1999-Present
- UPMC Passavant Hospital
Quality Care
Medical Advisor 2004-2007
- Pennsylvania Medical Society
Committee on the Practice of Medicine 1999
- Student Arts Project
Kids-On-The-Go
Reviewer 1998-2001
- Highmark Blue Cross/Blue Shield
Consultant 1998-1999
- Archives of Physical Medicine and Rehabilitation
Manuscript Reviewer 1997-Present
- American Association of Electrodiagnostic Medicine
State of Pennsylvania
Liaison 1997-2000
- UPMC Passavant Hospital
Subacute Rehabilitation Unit
Medical Director 1997-2001
- PA Medical Society
PA Academy of Physical Medicine and Rehabilitation
Interspecialty Section
Delegate 1996-2004
- American Association of Electrodiagnostic Medicine
Board Examiner 1996-2001
- UPMC Passavant Hospital
Credentials Committee
Chairman 1996-1997
1999-2001
2002-2007
- Variety Club (Pittsburgh Chapter)
Board of Directors 1996-1998

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- | | |
|--|--------------|
| ▪ Commonwealth of Pennsylvania
IMPACCT PA
Task Force Member | 1996-1997 |
| ▪ American Association of Electrodiagnostic Medicine
Professional Practice Committee | 1995-1996 |
| ▪ UPMC Passavant Hospital
Executive Committee | 1994-Present |
| ▪ PA Medical Society
PA Academy of Physical Medicine and
Rehabilitation Interspecialty Section
Alternate Delegate | 1994-1995 |
| ▪ Boy Scouts of America
Learning for Life Program | 1993 |
| ▪ UPMC Passavant Hospital
Credentials Committee | 1992-Present |
| ▪ PA Blue Shield/Medicare Carrier Advisory Committee
Delegate | 1992-1995 |
| ▪ PA Medical Society
Subcommittee on Continuing Medical Education
Member | 1992-1994 |
| ▪ PA Medical Society
Physicians Health Programs
Advisor | 1992-1993 |
| ▪ Archives of Physical Medicine and Rehabilitation
Manuscript Reviewer | 1991-1995 |
| ▪ PA Academy of Physical Medicine and Rehabilitation
President | 1991-1994 |
| ▪ Vice President | 1990-1991 |
| ▪ Secretary/Treasurer | 1989-1990 |
| ▪ Program Director | 1987-1989 |
| ▪ PA Academy of Physical Medicine and Rehabilitation
Ad Hoc Committee on Practice Parameters
Chairman | 1991-1992 |
| ▪ UPMC Passavant Hospital
"Bicycle Safety" Speaker's Bureau | 1990-1995 |

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- | | |
|---|-----------|
| ▪ UPMC Passavant Hospital
Institutional Review Board
Chairman | 1990-1993 |
| ▪ Presbyterian University Hospital
Division of Rehabilitation Medicine
Acting Director | 1990 |
| ▪ UPMC Passavant Hospital
Department of Physical Medicine
Chairman | 1989-2002 |
| ▪ UPMC Passavant Hospital
Executive Committee | 1989-1993 |
| ▪ Association of Academic Physiatrists
Education Committee | 1989-1992 |
| ▪ American Academy of Physical Medicine
and Rehabilitation
Scientific Abstracts Program Committee
Reviewer | 1989-1991 |
| ▪ Workwell, Inc
Medical Director | 1989-1990 |
| ▪ Pittsburgh Physiatry Society
Board Member | 1988-1995 |
| ▪ University of Pittsburgh
Department of Physical Education
Division of Exercise Physiology
Referee for Doctoral Dissertations | 1988-1990 |
| ▪ University of Pittsburgh
Graduate School of Public Health
Referee for Doctoral Dissertations | 1988-1990 |
| ▪ Upjohn Pharmaceutical Company
Professional Advisory Committee
President | 1987-1989 |
| ▪ American Rehabilitation Network
Medical Advisor | 1987-1989 |
| ▪ Physical Medicine and Rehabilitation
Keystone Peer Review Organization
Specialty Reviewer | 1987-1989 |

-
- Harmarville Rehabilitation Center
Head Injury Program
Medical Director 1986-1988
 - Social Security Disability
Medical Examiner 1985-1992
 - Twenty-Ninth Annual National Wheelchair Olympics
Volunteer Medical Staff 1985
 - Pittsburgh Marathon Wheelchair Participants
Volunteer Medical Staff/Coordinator 1985
 - Mt. Lebanon High School Football Team
Resident Physician 1984
 - University of Pittsburgh
Department of Orthopedic Surgery
Research Assistant 1978-1979

Teaching Appointments

- University of Pittsburgh
Department of Physical Medicine and Rehabilitation
Clinical Assistant Professor 1989-Present
- University of Pittsburgh School of Medicine
Physical Diagnosis of the Musculoskeletal System
Instructor 1986-1993
- University of Pittsburgh
Department of Orthopedic Surgery
Division of Rehabilitation Medicine
Clinical Instructor 1986-1989
- Cornell University
Department of Psychology
Teaching Assistant 1976-1977

Professional Memberships

- Allegheny County Medical Society
- American Academy of Physical Medicine and Rehabilitation
- American Association of Electrodiagnostic Medicine
- Association of Academy Physiatrists
- Pennsylvania Academy of Physical Medicine and Rehabilitation
- Pennsylvania Medical Society
- International Spine Injection Society

Presentations

- Current Theories and Treatment of Osteoporosis. Grand Rounds, Harmarville Rehabilitation Center, October 1983.
- Rehabilitation Aspects of Huntington's Disease. Grand Rounds, Harmarville Rehabilitation Center, March 1985.
- Late Effects of Poliomyelitis. PA Academy of Physical Medicine and Rehabilitation Annual Meeting, April 1985.
- Unusual Presentations of Tenosynovitis. Grand Rounds, Harmarville Rehabilitation Center, October 1985.
- The Management of Muscle Spasm. Grand Rounds, Harmarville Rehabilitation Center, October 1985.
- The Role of Physical Therapy in Dance Injuries. Pittsburgh Dance Medicine Symposium, November 1985.
- Pituitary Disease Following Closed Head Injury. Grand Rounds, Harmarville Rehabilitation Center, March 1986.
- Regional Anatomy of the Hip. Rheumatology Residents and Fellows Lecture Series, March 1986.
- Rehabilitation of the Patient with a Close Head Injury. Costa Rican Medical Society International Symposium on Rehabilitation, April 1986.
- EMG of the Cranial Nerves. Costa Rican Medical Society International Symposium on Rehabilitation, April 1986.
- The Management of the Agitated Patient. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, June 1986 and 1987.
- The Effectiveness of Team Treatment on a Specialized Unit. PA Academy of Physical Medicine and Rehabilitation Annual Meeting, May 1986.
- Novel Use of CPM/FES in the Prevention of DVT. Post-Graduate Course on Rehabilitation of the Brain Injured Adult and Child, XI Conference, Williamsburg, VA, June 1987.
- Carpal Tunnel Syndrome. Resident Lecture Series, Division of Rehabilitation, University of Pittsburgh, October 1987.
- Peripheral Nerve Injuries in Traumatic Brain Injured Patients. Post-Graduate Course on Rehabilitation of the Brain Injured Adult and Child XII Conference, Williamsburg, VA, June 1988.
- Shoulder Harness Palsy: Neuromuscular Injury Secondary to Passenger Restraint Mechanism. American Academy of Physical Medicine and Rehabilitation Annual Meeting, October 1988.
- Treatment of Decubitus Ulcers and Burns. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, October 1987 and November 1989.

- Therapeutic Uses of Pneumatic Compression and Massage. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, October 1988 and November 1989.
- Paralysis Periodica Paramyotonia: Case Report and Review of the Literature. Grand Rounds, Harmarville Rehabilitation Center, January 1989.
- Nutritional Management During Ultra-Endurance Events. International Sports Medicine Conference, Chinese University of Hong Kong, March 1989.
- Management of Post-Polio Patients. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, April 1989.
- Management of the Disabled Worker. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, October 1989.
- Functional Assessment of the Disabled Worker. Southwestern PA Association of Rehabilitation Nurses, October 1989.
- Unusual Presentations of Low Back Pain. Grand Rounds, Harmarville Rehabilitation Center, January 1990.
- Biologic, Social, and Psychologic Aspects of Low Back Pain. Department of Occupational Therapy, School of Health-Related Sciences, University of Pittsburgh, January 1990.
- Nutritional Aspects of Ultra-Endurance Events. Grand Rounds, Harmarville Rehabilitation Center, February 1990.
- Interpretation of Radiographs. Department of Physical Therapy, Slippery Rock University, August 1990.
- Prescription of Lower Extremity Orthotics. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, October 1990.
- Pre-Prosthetic Evaluation and Training. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, November 1990.
- Rehabilitation of the Head Injured Patient: Where Have We Failed? Visiting Professor, New Medico Corporation, Canonsburg, PA, December 1990.
- Post-Polio Syndrome. Resident Lecture Series, Division of Rehabilitation Medicine, University of Pittsburgh, January 1991.
- Management of Patients with Upper Extremity Amputations. Department of Occupational Therapy, School of Health-Related Sciences, University of Pittsburgh, January 1991.
- Biologic, Social, and Psychologic Aspects of Low Back Pain. Department of Occupational Therapy, School of Health-Related Sciences, University of Pittsburgh, January 1991.
- Management of Low Back Pain. Department of Occupational Therapy, School of Health-Related Sciences, University of Pittsburgh, March 1991.
- Critical, Social, Medical, and Economic Issues in the Rehabilitation of the Injured Worker: How Much is Enough? Interpose Insurance Group, May 1991.
- Plexopathy and Neuropathy. Post-Graduate course on Electrodiagnosis and Electromyography, Department of Neurology, Division of Physical Medicine and Rehabilitation, University of Pittsburgh, May 1991.
- Cardiovascular Conditioning. Resident Lecture Series, Division of Physical Medicine and Rehabilitation, University of Pittsburgh, May 1991.
- Disability Examinations in Physical Medicine and Rehabilitation. Resident Lecture Series, Department of Physical Medicine and Rehabilitation, University of Pittsburgh, September 1991.

- Case Histories in Worker's Compensation. Resident Lecture Series, Department of Physical Medicine, University of Pittsburgh, October 1991.
- Quality in the Delivery of Physical Medicine and Rehabilitation Services in the Competitive Marketplace. 1991 Distinguished Medical Lectureship, Harmarville Rehabilitation Center, May 1992.
- Treatment of Low Back Pain and Related Disorders. Division of Occupational Therapy, Department of Rehabilitation and Health Sciences, University of Pittsburgh, March 1993.
- Osteoporosis. Grand Rounds, The Rehabilitation Institute of Pittsburgh, June 1993.
- Rehabilitation of Endocrine Disorders—Parts I and II. Department of Physical Therapy, Slippery Rock University, December 1993.
- Prevention and Treatment of Back Pain. Society of Automotive Engineers, August 1994.
- Low Back Pain: Meta-Analysis and Literature Review. Interpose Symposium, November 1994.
- Medical-Legal Aspects of Physical Medicine and Rehabilitation. Resident Lecture Series, University of Pittsburgh, June 1995.
- Carpal Tunnel Syndrome. Grand Rounds, UPMC Passavant Hospital, July 1995.
- Disability: Medical, Sociologic, and Economic Effects. Grand Rounds, The Rehabilitation Institute of Pittsburgh, September 1995.
- Low Back Pain. Grand Rounds, UPMC Passavant Hospital, February 1996.
- Subacute Rehabilitation: What Is It? How Does It Work? Grand Rounds, UPMC Passavant Hospital, November 1996.
- Reflex Sympathetic Dystrophy: Diagnosis and Treatment. Pennsylvania Defense Institute, December 1996.
- Carpal Tunnel Syndrome in Railroad Workers. Association of Academic Physiatrists, Orlando, FL, February 1999.
- Current Concepts in Carpal Tunnel Syndrome. Grand Rounds, UPMC Rehabilitation Hospital, March 1999.
- Controversy in Cervical and Lumbar Spine Disorders. Allegheny County Bar Association, March 1999.
- Repetitive Motion Disorders. Tri-State Occupational Medicine Association 2000 Scientific Session, September 2000.
- Carpal Tunnel Syndrome in Railroad Workers. Association of American Railroads Annual Claims Meeting, Norfolk, VA, September 2000.
- Thenar Motor Syndrome. American Association of Electrodiagnostic Medicine Annual Meeting, Philadelphia, PA, September 2000.
- Electrodiagnosis in Carpal Tunnel Syndrome. Department of Physical Medicine and Rehabilitation, University of Pittsburgh School of Medicine Annual Course of Electrodiagnosis and Electromyography, March 2002.
- Core Measures and their Implications. UPMC Medical Staff, September 2005.
- Public Reporting and the 21st Century Physician. Allegheny General Hospital/Triangle Medical Meetings. Nemacolin Woodlands, March 19, 2006.
- Carpal Tunnel Syndrome. EMG Course. University of Pittsburgh, Department of Physical Medicine and Rehabilitation, March 24, 2006.
- Contribution of Electrodiagnostic Studies in Lumbar Spinal Stenosis. AANEM Annual Meeting, Quebec City, QC, Canada, October 9, 2010.

Published Abstracts

- Cosgrove JL and Alexander MA. Late Effects of Poliomyelitis. Arch Phys Med Rehabil 66:531, 1985.
- Cosgrove JL and Nicholas JJ. The Effectiveness of Team Treatment on a Specialized Unit. Arch Phys Med Rehabil 67:632, 1986.
- Cosgrove JL, Vargo M, and Reidy ME. Peripheral Nerve Injuries in Traumatic Brain Injured Patients. Arch Phys Med Rehabil 69:745, 1988.
- Cosgrove JL. Shoulder Harness Palsy: Neuromuscular Injury Secondary to Passenger Restraint Mechanism. Arch Phys Med Rehabil 69:800, 1988.
- Cosgrove JL and Mast NJ. Thenar Motor Syndrome: Median Mononeuropathy of the Hand (abs). Muscle Nerve 23:1634, 2000.
- Cosgrove JL. The Prevalence of Carpal Tunnel Syndrome in a General Population; JAMA 283(8): 1000, 2000.
- Cosgrove, JL, Chase SL, and Cosgrove GK. Contribution of Electrodiagnostic Studies in Lumbar Spinal Stenosis (abs). Muscle Nerve 42:665-666, 2010.

Publications

- Evans CH, Mears DC, and Cosgrove JL. Release of Neutral Proteinase from Mononuclear Phagocytes and Synovial Cells in Vitro. Bioch et Biophys Acta 677:287-294, 1981.
- Cosgrove JL, Alexander MA, Kitts EL, Klein MJ, Swan BE, and Bauer RE. Late Effects of Poliomyelitis. Arch Phys Med Rehabil 68:4-7, 1987.
- Cosgrove JL, Welch DA, Richardson GS, and Nicholas JJ. Diaper Doer's Hand: Stenosing Tenosynovitis in the Post-Partum Period. Clin Rehab 1:219-223, 1987.
- Cosgrove JL. Be Alert for New Problems in Former Polio Patients. J Musculoskel Med April 1987, 35-50.
- Cosgrove JL, Nicholas JJ, Barmack J, Brewer C, Mientus JM, McConnell RL and Rinaldo D. Team Treatment—Does a Specialized Unit Improve Team Performance? Am J Phys Med 67:253-260, 1988.
- Cosgrove JL, Vargö M, and Reidy ME. A Prospective Study of Peripheral Nerve Lesions Occurring in Traumatic Brain Injured Patients. Am J Phys Med 68:15-17, 1989.
- Bayles CM, Metz KF, Robertson R, Goss FL, Cosgrove JL, and McBurney D. Perceptual Regulation of Prescribed Exercise. J Cardiopulmonary Rehab 10:25-31, 1990.
- Cosgrove JL. Carpal Tunnel Syndrome: Magnetic Resonance Imaging in the Evaluation of Carpal Tunnel Syndrome: A Literature Review. J Clin Neuromusc Dis 1:175-180, 2000.
- Cosgrove JL, Chase PM, Mast NJ, and Reeves R. Carpal Tunnel Syndrome in Railroad Workers. Am J Phys Med 81:101-107, 2002.
- Cosgrove JL, Chase PM, and Mast NJ. Thenar Motor Syndrome: Median Mononeuropathy of the Hand. Am J Phys Med 81:421-423, 2002.

Grants

- Principle Investigator, Quantitative Evaluation of Muscle Strength in Post-Polio Survivors; March of Dimes; 1989-91.

Awards

- | | |
|-------------------------------|------|
| ▪ Laubengayer Chemistry Award | 1975 |
| Cornell University | |
| ▪ Distinguished Alumni Award | 1991 |
| Fox Chapel High School | |

Revised 12-9-10 clw

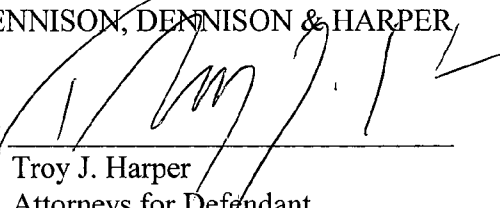
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Amended Notice of Intent to Introduce Documents Pursuant to Pa.R.C.P. 1305 was served on the 8th day of November, 2012 by United States Mail, First Class, Postage Prepaid, addressed to the following:

Jeffrey Lundy, Esq.
Lundy & Lundy
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant

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

Hannah Wallace, a minor, by her parents
Thomas Wallace and Sharon Wallace; and
Thomas Wallace and Sharon Wallace, indiv.,
in their own right

vs.

Irene J. Wilkinson

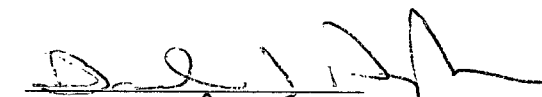


No. 2007-00941-CD

OATH OR AFFIRMATION OF ARBITRATORS

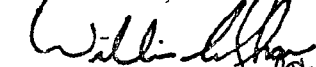
Now, this 29th day of November, 2012, we the undersigned, having been appointed arbitrators in the above case do hereby swear, or affirm, that we will hear the evidence and allegations of the parties and justly and equitably try all matters in variance submitted to us, determine the matters in controversy, make an award, and transmit the same to the Prothonotary within twenty (20) days of the date of hearing of the same.

David J. Hopkins, Esq.

Frederick M. Neiswender, Esq.
David R. Thompson, Esq.


Chairman



Sworn to and subscribed before me this
November 29, 2012





Prothonotary

FILED
9:44 AM
NOV 29 2012
William A. Shaw
Prothonotary/Clerk of Courts

AWARD OF ARBITRATORS

Now, this 29th day of Nov, 12, we the undersigned arbitrators appointed in this case, after being duly sworn, and having heard the evidence and allegations of the parties, do award and find as follows:

case settled by parties.


Chairman



(Continue if needed on reverse.)

ENTRY OF AWARD

Now, this _____ day of _____, _____, I hereby certify that the above award was entered of record this date in the proper dockets and notice by mail of the return and entry of said award duly given to the parties or their attorneys.

WITNESS MY HAND AND THE SEAL OF THE COURT

Prothonotary

By _____

FILED

NOV 29 2012

William A. Shaw
Prothonotary/Clerk of Courts

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

	:	Case No.:	07-941 CD
Thomas Wallace,	:		
and Sharon Wallace	:	Type of Pleading:	Pre-Trial Statement
Plaintiffs,	:		
v.	:		
Irene J. Wilkinson	:	Counsel of Record for this Party:	
Defendant.	:	Jeffrey Lundy	
	:	PA I.D. 25823	
	:	Lundy & Lundy	
	:	219 East Union Street	
	:	PO Box 74	
	:	Punxsutawney, PA 15767	
	:	(814) 938-8110	

RECEIVED

NOV 21 2012

Court Administrator's
Office*Arbitration: 11-29-12
@9:00*

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

	:	Case No.:	07-941 CD
Thomas Wallace,	:		
and Sharon Wallace	:	Type of Pleading:	Pre-Trial Statement
Plaintiffs,	:		
v.	:		
Irene J. Wilkinson	:	Counsel of Record for this Party:	
Defendant.	:	Jeffrey Lundy	
	:	PA I.D. 25823	
	:	Lundy & Lundy	
	:	219 East Union Street	
	:	PO Box 74	
	:	Punxsutawney, PA 15767	
	:	(814) 938-8110	

PRE-TRIAL STATEMENT

AND NOW, comes Thomas and Sharon Wallace and presents the following Pre-Trial Statement:

Statement of Case: This is case emanates from a motor vehicle accident that occurred July 15, 2005 on State Route 322 in Luthersburg when the Plaintiff, Thomas Wallace, was struck by the Defendant Irene Wilkinson, who was operating her vehicle in a negligent crossing the centerline and striking the Wallace vehicle. (Hannah Wallace, a minor daughter passenger in the Wallace vehicle was injured as well and an original party Plaintiff which portion was settled and discontinued). As a result of the accident Thomas suffered neck and low back injuries for which he seeks reasonable compensation. Sharon Wallace has asserted a consortium claim. The couple maintained a full tort policy.

Thomas Wallace is hard working individual and has worked most of his career at the Shawville Plant in various capacities (mobile maintenance, meter reader, welder, mechanic) in the medium to heavy duty range. He has had an exemplary work record and was off for several months as a result of the accident and resulting headaches.

The accident was essentially a head on collision for which he suffered severe persistent headaches from a cervical strain and sprain and some low back discomfort. His treatment in

trying to resolve the headaches was extensive over an extended period of time and included chiropractic, physical therapy, neurology specialists with Dr. Dietz/Kratz, Dr. Valigosky, Dr. Hallstrum, and Dr. Watson of The Headache Center. He was also evaluated with an IME by the Defendant physician and his auto carrier via Peer Review. The most telling sign of Thomas Wallace wanting to resolve the headaches was his willingness to undergo occipital nerve blockade and epidural steroid injections into his neck, which provided very modest or no benefit in 2007.

Thomas describes his situation as having migraine headaches prior to the accident which he deal with, but the accident and cervical injury has caused him significant problems over a three to four year period, with best describing his current condition now as fairly good, but certainly not his old self.

Applicable Case Law: Standard negligent case.

List of Witnesses/Exhibits:

Thomas Wallace

Sharon Wallace

Exhibits Listed on Plaintiff's Rule 1035 Notice provided to Defense Counsel, attached, and all exhibits listed on Defendant's Rule 1035 Notice.

- a. Citation to Applicable Case or Statute: None.
- b. List of Witnesses: Thomas Wallace and Sharon Wallace.

Damages: There are no outstanding medical bills and Plaintiffs seek reasonable and fair compensation for the injuries under applicable standards. He also seeks a wage differential between the amount paid by his No-fault carrier while being off work for several months and pain and suffering. Plaintiffs are requesting award of the arbitration limits.

Respectfully submitted,



Jeffrey Lundy, Esq.

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

THOMAS WALLACE and SHARON
WALLACE; individually,

Plaintiffs

: NO. 07-941 C.D.
:
: Type of Pleading: NOTICE OF INTENTION TO
: OFFER DOCUMENTS

vs.

: Filed on Behalf of: PLAINTIFF

IRENE J. WILKINSON;
Defendants

: Counsel of Record for this Party:
: Jeffery Lundy, Esquire
: Supreme Court I.D. # 25823
: LUNDY & LUNDY
: 219 East Union Street
: Punxsutawney, PA 15767
: (814) 938-8110

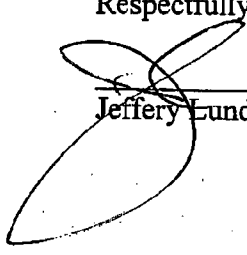
NOTICE OF INTENTION TO OFFER DOCUMENTS

AND NOW, come Thomas and Sharon Wallace, by and through their Attorney Jeffrey Lundy Esquire and presents the following Notice pursuant to Rule 1305 with the Rules of Civil Procedure of Intention to Offer Documents;

1. July 16, 2005 Pennsylvania State Police Accident Report,
2. Records of Dubois Regional Medical Center printed February 4, 2009 revision date November 14, 2005, printed dated February 4, 2009, revision date January 23, 2008,
3. Summit Rehabilitation Associates, Inc. Laun R. Hallstrom M.D. nerve conduction study June 14, 2006,
4. Summit Rehabilitation Associates Inc. January 14, 2006 letter of Laun R. Hallstrom,
5. Medical records including letters from Dr. V. Thomas Watson M.D. to Dr. Robert Usaitis letter dated July 20, 2007,
6. Medical records from Dr. Robert Usaitis,
7. Medical records from Dr. Etta Dietz including medical reports of May 1, 2006, February 28, 2006, January 16, 2006, December 14, 2005,
8. Peer review report of Dr. Robert Cohen D.O. dated March 2, 2006,
9. Medical report dated February 22, 2007 of Dr. Joseph Valigorsky with attached medical records including medical report of February 9, 2007,
10. September 8, 2005 off work record by Dr. Robert Usaitis,
11. December 28, 2005 chiropractic report by Dr. Steven Pagano,
12. Primary Care Associates medical arts building records July 25, 2005 to April 6, 2006,
13. Medical records of Dr. Aaron Peters,
14. Report of Tri-Rivers Consulting Services March 31, 2011.

All the aforementioned have been provided or are in the possession of the Defendant.

Respectfully Submitted,


Jeffery Lundy, Esquire



Lundy & Lundy

Attorneys at Law

219 East Union Street
P.O. Box 74
Punxsutawney, PA 15767

Telephone: (814) 938-8110
Facsimile: (814) 938-3489

To: <u>Court Administrator</u>	From: <u>Lalor@Jeff Lundy's office</u>
Fax: <u>814-765-7649</u>	Pages: <u>6 including this cover</u>
Phone:	Date: <u>11-21-12</u>
Re: <u>Wallace v. Wilkinson</u>	CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Comments:

CONFIDENTIAL

RECEIVED NOV 21 2012

DENNISON, DENNISON & HARPER

Attorneys at Law

Donald J. Dennison (1917-2002)
John C. Dennison, II
Troy J. Harper

293 Main Street
Brookville, PA 15825
Telephone: (814) 849-8316
Fax: (814) 849-4656
Email: ddhtroy@usachoice.net
Website: www.dennisonharper.com

November 20, 2012

F. Cortez Bell, III
Court Administrator
Clearfield County Court of Common Pleas
Clearfield County Courthouse
230 East Market Street
Clearfield, Pennsylvania 16830

RE: Wallace v. Wilkinson
No. 2007 - 941 C.D.

Dear Mr. Bell:

Enclosed is the original Prearbitration Statement in regard to the above-captioned matter. The same is being submitted to you pursuant to 46 J.D.R.P. 1306A and the Order for arbitration entered by the Court on November 5, 2012.

Thank you for your cooperation. Please contact me if you have any questions concerning this matter.

Very truly yours,

DENNISON, DENNISON & HARPER


Troy J. Harper

Enclosure

pc: Jeffrey Lundy, Esq. (Counsel for Plaintiff)
David J. Hopkins, Esq. (Arbitrator)
Frederick M. Neiswender, Esq. (Arbitrator)
David R. Thompson, Esq. (Arbitrator)
(All w/enc.)

Arbitration
11-29-12 @ 9:00

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HANNAH WALLACE, a minor, by her parents
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

CIVIL ACTION - LAW

Number 2007 - 941 C.D.

Type of Case: Civil Division

Type of Pleading: Prearbitration Statement

Filed on behalf of: Defendant

Counsel of Record for this Party:

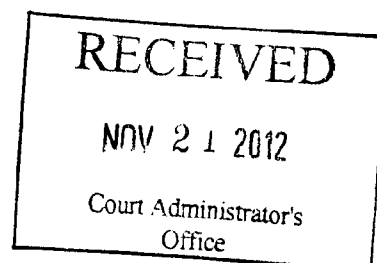
Troy J. Harper

Supreme Court Number: 74753

John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER
293 Main Street
Brookville, Pennsylvania 15825
(814) 849-8316



HANNAH WALLACE, a minor, by her parents,
THOMAS WALLACE and SHARON
WALLACE; and THOMAS WALLACE and
SHARON WALLACE, individually, in their
own right,

Plaintiffs,

vs.

IRENE J. WILKINSON,

Defendant.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*
*
*
*

* Civil Action - Law

*
*
*

* Number 2007 - 941 C.D.

PREARBITRATION STATEMENT

AND NOW, comes the Defendant, IRENE J. WILKINSON, by and through her
attorneys, Dennison, Dennison & Harper, who file the following Prearbitration Statement
pursuant to 46 J.D.R..P. 1306A:

STATEMENT OF THE CASE

On July 16, 2005, at approximately 11:00 a.m., the Defendant, Irene Wilkinson, was
operating her 2002 Dodge Stratus in a westerly direction on United States Highway Route 322
(hereinafter Route 322) in the Village of Luthersburg, Clearfield County, Pennsylvania. Mrs.
Wilkinson's husband, who later died as a result of injuries sustained in the accident, was in the
front passenger's seat and they were on their way to a veteran's function.

Mrs. Wilkinson approached the intersection of Route 322 and State Route 410 which is a
"Y" type intersection. She intended to make a left-hand turn onto State Route 410. At the same

time, the Plaintiff, Thomas Wallace, was operating his 1996 GMC 1500 pick-up truck in the eastbound lane of Route 322 as he approached the intersection.

Mrs. Wallace began to make a left-hand turn from the westbound lane of Route 322 when the pick-up truck operated by the Plaintiff exited a left-hand curve in the eastbound lane of Route 322 and the front end of the Plaintiff's pick-up truck struck the front end of Mrs. Wilkinson's vehicle.

The Plaintiff contends that he suffered various alleged soft tissue injuries. The Plaintiff did not report any injuries to the investigating State Trooper and he did not seek immediate medical care. The Plaintiff had a long history of preexisting symptomatic headaches dating back to when he was ten years old and he struck his head on a gas meter. In addition, the Plaintiff was undergoing chiropractic care prior to the accident for headaches, neck pain, mid-back pain and lumbar pain which was interfering with his activities, work and sleep. In fact, he had treated with a chiropractor only two (2) days prior to the accident involved in this case.

WITNESSES

The Defendant, Irene Wilkinson, may call some or all of the following witnesses at the time of the Arbitration.

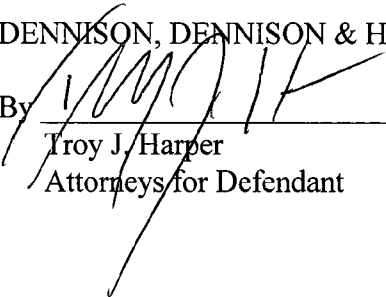
- (1) Irene Wilkinson, Defendant
- (2) Thomas Wallace, Plaintiff
- (3) Sharon Wallace, Plaintiff

(4) Trooper David O'Donnell, Pennsylvania State Police

RESPECTFULLY SUBMITTED,

DENNISON, DENNISON & HARPER

By


Troy J. Harper

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Prearbitration Statement was served on the 20th day of November, 2012, by United States Mail, First Class,

Postage Prepaid, addressed to the following:

F. Cortez Bell, III
Court Administrator
Clearfield County Court of Common Pleas
Clearfield County Courthouse
230 East Market Street
Clearfield, Pennsylvania 16830

Jeffrey Lundy, Esq.
Lundy & Lundy
219 East Union Street
P.O. Box 74
Punxsutawney, Pennsylvania 15767
(Counsel for Plaintiff)

David J. Hopkins, Esq.
Hopkins & Heltzel, LLP
100 Meadow Lane, Suite 5
DuBois, Pennsylvania 15801
(Arbitrator)

Frederick M. Neiswender, Esq.
Neiswender & Kubista
211 ½ N. Second Street
Clearfield, Pennsylvania 16830
(Arbitrator)

David R. Thompson, Esq.
P.O. Box 587
Philipsburg, Pennsylvania 16866
(Arbitrator)

DENNISON, DENNISON & HARPER

By 

Troy J. Harper
Attorneys for Defendant