

07-1750-CD

Melissa Mottern vs John Reasinger

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

MELISSA MOTTERN, also known as
MELISSA PETERMAN,

Plaintiff,

vs.

JOHN REASINGER,

Defendant.

No.: 07-1750-CD

NEGLIGENCE-MOTOR VEHICLE

**COMPLAINT
IN CIVIL ACTION**

Filed on Behalf of Melissa Mottern,
also known as Melissa Peterman,
Plaintiff

Counsel of Record for this party:

Laurence B. Green, Esquire
Pa. I.D. # 10399
BERGER AND GREEN, P.C.
Firm #777
5850 Ellsworth Avenue
Suite 200
Pittsburgh, PA 15232
(412) 661-1400
lawyer@bergerandgreen.com

JURY TRIAL DEMANDED

FILED 1 CC Sheriff
mta: 54/60
OCT 29 2007 Atty. pd. 85.00
(54)

William A. Shaw
Prothonotary/Clerk of Courts

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

MELISSA MOTTERN, also known as	:	No.:
MELISSA PETERMAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JOHN REASINGER,	:	
	:	
Defendant.	:	
	:	

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing, in writing with the Court, your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

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

Court Administrator
Clearfield County Courthouse
Second & Market Streets
Clearfield, PA 16830
(814) 765-2641, Ext: 50-51

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

MELISSA MOTTERN, also known as	:	No.:
MELISSA PETERMAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JOHN REASINGER,	:	
	:	
Defendant.	:	
	:	

COMPLAINT IN CIVIL ACTION

AND NOW, comes the Plaintiff, Melissa Mottern, also known as Melissa Peterman, by and through her attorneys Berger and Green, P.C., and Laurence B. Green, Esquire, and files the within Complaint in Civil Action and in support thereof states as follows:

1. The Plaintiff, Melissa Mottern, also known as Melissa Peterman, (hereinafter "Melissa Mottern") is an adult individual currently residing at 3708 Allens Mills Road, Reynoldsville, Jefferson County, Pennsylvania 15851.

2. At all times material to this Complaint, the Plaintiff, Melissa Mottern, was the right front seat passenger in a 1993 Pontiac Sunbird (hereinafter "the Seaman vehicle") owned and operated by Kimberly Seaman, an adult individual with a last known address of 1027 Grant Street, Reynoldsville, Jefferson County, Pennsylvania 15851.

3. The Defendant, John Reasinger, is an adult individual with a last known address of 69 Britton Drive, Falls Creek, Jefferson County, Pennsylvania 15840, and at all times relevant hereto was the owner and operator of a 1996 Chevrolet Tahoe vehicle (hereinafter "the Reasinger vehicle.")

4. The motor vehicle collision complained of herein happened on or about January 7, 2004 in Falls Creek Borough, Clearfield County, Pennsylvania.

5. Accordingly, venue properly lies in Clearfield County, Pennsylvania pursuant to Rule 1006 of the Pennsylvania Rules of Civil Procedure.

6. On the date of the accident, Plaintiff, Melissa Mottern was a minor child, age 15, having been born on March 17, 1988. Plaintiff attained her majority on March 17, 2006, and thus is entitled to bring this action on her own behalf.

7. On or about January 7, 2004, at approximately 6:12 p.m., the Plaintiff, Melissa Mottern, was a passenger in the "Seaman vehicle" which was proceeding eastbound on State Route 830 in Falls Creek Borough, Clearfield County, Pennsylvania. The Defendant, John Reasinger, was operating his 1996 Chevrolet Tahoe westbound on State Route 830 in Falls Creek Borough, Clearfield County, Pennsylvania.

8. As the "Seaman vehicle" proceeded eastbound on S.R. 830, suddenly and without warning, the Defendant, John Reasinger, made a left hand turn directly into the path of the "Seaman vehicle".

9. As a direct and proximate result of the collision between the "Seaman vehicle" and the "Reasinger vehicle", the Plaintiff, Melissa Mottern, was caused to suffer and sustain severe and serious injuries.

10. The negligence, carelessness and recklessness of the Defendant, John Reasinger, directly and proximately caused the Plaintiff, Melissa Mottern, to suffer and sustain the following serious injuries:

- a. loss of consciousness;
- b. closed head injury;
- c. headaches;
- d. post concussive syndrome/Grade II concussion;
- e. dizziness;
- f. laceration to right upper eyelid;
- g. numbness of the right frontal and right zygomatic area;
- h. decreased visual perceptual skills;
- i. blurred vision/double vision;
- j. major depressive disorder;
- k. moderate post traumatic stress disorder;
- l. memory problems;
- m. difficulty concentrating;

- n. neck and back pain;
- o. right hip pain-iliopsoas strain/sprain;
- p. right wrist and hand pain;
- q. right shoulder pain;
- r. laceration to right hand;
- s. chest pain;
- t. multiple left and right sided rib fractures;
- u. numbness, tingling and weakness in both arms and legs;
- v. post traumatic myofascial pain syndrome;
- w. post traumatic fibromyalgia syndrome;
- x. decreased cervical and shoulder range of motion;
- y. teeth loosened;
- z. pain of both the right and left TMJ's;
- aa. displacement of both condyle-dislocated jaw;
- bb. capsulitis of the temporomandibular joint;
- cc. compression injury of both TMJ's;
- dd. bilateral knee pain and swelling;
- ee. post traumatic chondromalacia of patellofemoral joint with palpable plica;
- ff. patellofemoral chondromalacia;

- gg. bilateral patellofemoral syndrome;
- hh. patellofemoral instability; and
- ii. bilateral patellar hypermobility with instability.

11. The negligence, carelessness and recklessness of the Defendant, John Reasinger, directly and proximately caused the Plaintiff, Melissa Mottern, to undergo the following procedures:

- a. multiple bilateral patellar stabilizing braces;
- b. electrical stimulation to neck and back;
- c. trigger point injections to neck and back;
- d. several courses of physical therapy;
- e. lumbar support belt; and
- f. right and left knee surgeries.

12. As a direct and proximate result of the negligence, carelessness and recklessness of the Defendant, John Reasinger, as is more fully set forth below, the Plaintiff, Melissa Mottern, has suffered in the past and will suffer for an indefinite period of time in the future the following damages:

- a. Pain, suffering, scarring and inconvenience;
- b. Fright, shock, worry, humiliation, anxiety, irritation, annoyance and other forms of distress;

- c. Impairment of her general health, strength and vitality;
- d. Loss of earnings and loss of earning capacity;
- e. Inability to continue in her usual activities; and
- f. Loss of life's pleasures.

13. The Plaintiff, Melissa Mottern, believes and therefore avers that some of the aforesaid damages and injuries may be of a permanent and lasting nature.

14. As a further direct and proximate result of the negligence, carelessness and recklessness of the Defendant, John Reasinger, which is more fully set forth below, the Plaintiff, Melissa Mottern, has been in the past and may be for an indefinite period of time in the future unable to engage in her usual activities.

15. As a further and proximate result of the negligence, carelessness and recklessness of the Defendant, John Reasinger, which is more fully set forth below, the Plaintiff, Melissa Mottern, has been in the past and may be for an indefinite time in the future required to spend substantial sums of money for medicines, medical, nursing, hospital and surgical attention and other incidental expenses in an attempt to effectuate a cure for herself as a result of the injuries sustained in the accident.

16. In addition to the expenses enumerated above, the Plaintiff, Melissa Mottern, as a further direct and proximate result of the negligence, carelessness and recklessness of the Defendant, John Reasinger, has been required in the past and may in the future be required to spend substantial sums of money on other incidental costs incurred as a result of the January 7, 2004 motor vehicle collision.

17. The aforementioned injuries and damages to the Plaintiff, Melissa Mottern, were caused directly and proximately by the negligence, carelessness and recklessness of the Defendant, John Reasinger, in general and more particularly in the following manner:

- a. The Defendant was inattentive and failed to maintain a sharp observation of the road;
- b. The Defendant failed to maintain a proper lookout;
- c. The Defendant failed to watch or look where the motor vehicle was being operated;
- d. The Defendant failed to use the degree of care, skill and caution required under the circumstances;
- e. The Defendant operated the motor vehicle at an excessive, dangerous and reckless rate of speed under the circumstances;
- f. The Defendant failed to keep the motor vehicle under control, or to bring it under control when the Defendant knew or, in the exercise of due care and caution, should have known that to fail to do so would likely result in injuries and damages to the Plaintiff;
- g. The Defendant operated the motor vehicle at a speed greater than was reasonable and prudent under the conditions then and there existing, having no regard for the actual and potential hazards existing;
- h. The Defendant operated the motor vehicle with careless disregard for the safety of persons or properties in violation of 75 Pa. C.S. §3714;
- i. The Defendant failed to yield to oncoming traffic before making a left hand turn;
- j. The Defendant failed to yield the right-of-way in violation of 75 Pa.C.S. §3322;

- k. The Defendant continued to operate the motor vehicle when the Defendant knew or should have known in the exercise of reasonable diligence, that further operation of the motor vehicle in that direction would result in a collision;
- l. The Defendant operated his motor vehicle in willful or wanton disregard for the safety of persons or property in violation of 75 Pa.C.S. §3736;
- m. The Defendant failed to operate the brakes on the motor vehicle in such a manner so that the motor vehicle could be stopped before colliding with the Plaintiff's motor vehicle;
- n. The Defendant operated the motor vehicle when he knew or reasonably should have known that it was in a state of disrepair and/or unsafe to drive under the circumstances;
- o. The Defendant failed to properly and/or adequately inspect and/or maintain the motor vehicle to ensure that it was equipped with proper and/or properly operating signals, safety devices, warning devices, tires and/or brake systems;
- p. The Defendant failed to properly and/or adequately inspect and/or maintain the motor vehicle to ensure that it was safe to drive;
- q. The Defendant operated the motor vehicle while in an intoxicated state that rendered him unfit to operate the vehicle in a safe manner; and
- r. The Defendant operated his motor vehicle in violation of 75 Pa.C.S. §3731.

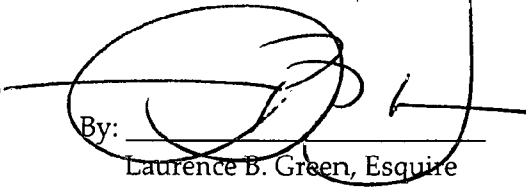
WHEREFORE, the Plaintiff, Melissa Mottern, requests this Honorable Court to enter

judgment in her favor and against the Defendant, John Reasinger, and in an amount in excess of the arbitration limits of this Court.

JURY TRIAL DEMANDED

Respectfully submitted,

BERGER AND GREEN, P.C.

By: A handwritten signature in black ink, appearing to be 'LB Green', is written over a horizontal line. The signature is enclosed in a large, loopy oval shape.

Laurence B. Green, Esquire

Pa. I.D. #10399

5850 Ellsworth Avenue

Suite 200

Pittsburgh, PA 15232

(412) 661-1400

lawyer@bergerandgreen.com

Attorney for the Plaintiff

VERIFICATION

I verify that the statements made in the COMPLAINT IN CIVIL ACTION are true and correct; that the attached COMPLAINT IN CIVIL ACTION is based upon information which I have furnished to my counsel and information which has been gathered by my counsel in the preparation of the lawsuit. The language of the COMPLAINT IN CIVIL ACTION is that of counsel and not the plaintiff. I have read the COMPLAINT IN CIVIL ACTION and to the extent that the COMPLAINT IN CIVIL ACTION is based upon information which I have given to my counsel, it is true and correct to the best of my knowledge, information and belief. To the extent that the content of the COMPLAINT IN CIVIL ACTION is that of counsel, I have relied upon counsel in making this Verification. I understand that false statements herein made are subject to the penalties of 18 Pa. CONS. STAT §4904 relating to unsworn falsification to authorities.

DATED: 10/11/07

Melissa Mottern
Melissa Mottern

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

MELISSA MOTTERN, also known as :	Type of Case: Civil Action
MELISSA PETERMAN,	:
Plaintiff :	No. 2007-1750-CD
:	:
vs. :	Type of Pleading:
:	Praeipice for Entry of
JOHN REASINGER,	Appearance
Defendant :	:
:	Filed on Behalf of:
:	Defendant
:	:
:	Counsel of Record for This
:	Party:
:	Matthew B. Taladay, Esq.
:	Supreme Court No. 49663
:	Hanak, Guido and Taladay
:	528 Liberty Boulevard
:	P.O. Box 487
:	DuBois, PA 15801
:	(814) 371-7768

Dated: November 15, 2007

FILED No CC.
m/ 11:20am
NOV 16 2007
William A. Shaw
Prothonotary/Clerk of Courts

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

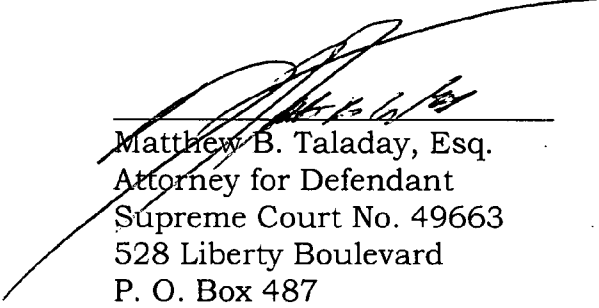
MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :
vs. : No. 2007-1750-CD
JOHN REASINGER, :
Defendant :

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of the Defendant,
John Reasinger, in the above captioned matter.

Dated: November 15, 2007



Matthew B. Taladay, Esq.
Attorney for Defendant
Supreme Court No. 49663
528 Liberty Boulevard
P. O. Box 487
DuBois, PA 15801
(814) 371-7768

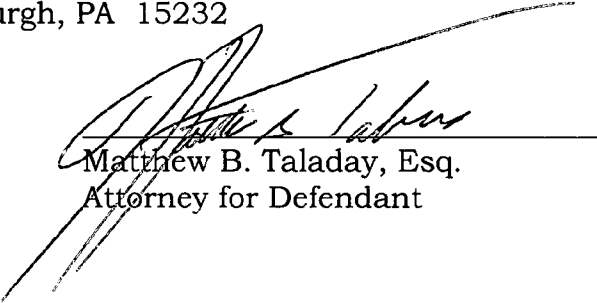
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :
vs. : No. 2007-1750-CD
JOHN REASINGER, :
Defendant :

CERTIFICATE OF SERVICE

I certify that on the 15th day of November, 2007, a true and correct copy of Defendant's Praecipe for Entry of Appearance was sent via first class mail, postage prepaid, to the following:

Laurence B. Green, Esq.
Attorney for Plaintiff
Berger and Green, P.C.
5850 Ellsworth Avenue, Suite 200
Pittsburgh, PA 15232


Matthew B. Taladay, Esq.
Attorney for Defendant

FILED

JAN 24 2008

m/12.30/w
William A. Shaw
Prothonotary/Clerk of Courts

No. C/C

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

vs. :

JOHN REASINGER, :
Defendant :

Type of Case: Civil Action

No. 2007-1750-CD

Type of Pleading:
Answer and
New Matter

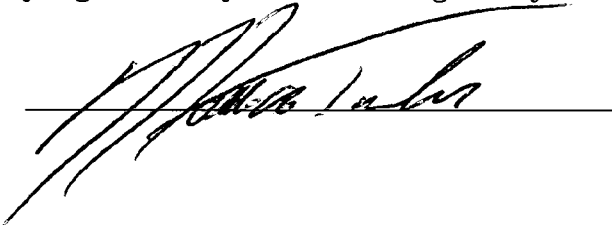
Filed on Behalf of:
Defendant

Counsel of Record for This
Party:

Matthew B. Taladay, Esq.
Supreme Court No. 49663
Hanak, Guido and Taladay
528 Liberty Boulevard
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

Dated: 01-23-08

You are hereby notified to plead
to the within pleading within twenty
(20) days of service thereof or default
judgment may be entered against you.



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

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :
vs. : No. 2007-1750-CD
JOHN REASINGER, :
Defendant :

ANSWER

AND NOW, comes the Defendant, John Reasinger, by his
attorneys, Hanak, Guido and Taladay, and hereby responds to Plaintiff's
Complaint as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Upon information and belief, admitted.
7. Admitted.
8. Denied as stated. However, it is admitted that a
collision occurred between the Peterman vehicle and the Reasinger
vehicle.
9. After reasonable investigation, Defendant is without
information sufficient to form a belief as to the averments of paragraph

No. 9 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

10. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 10, the Defendant is, after reasonable investigation, without information sufficient to form a belief as to the averments of paragraph No. 10 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

11. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 11, the Defendant is, after reasonable investigation, without information sufficient to form a belief as to the averments of paragraph No. 10 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

12. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 10, the Defendant is, after reasonable investigation, without information sufficient to form a belief as to the averments of paragraph No. 12 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

13. After reasonable investigation, Defendant is without information sufficient to form a belief as to the averments of paragraph No. 13 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

14. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 14, the Defendant is, after reasonable investigation, without information sufficient to form a belief as to the averments of paragraph No. 12 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

15. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 15, the Defendant is, after reasonable investigation, without information sufficient to form a belief as to the averments of paragraph No. 12 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

16. Defendant Reasinger denies allegations of carelessness and recklessness, but admits negligence and admits responsibility for the subject accident. With regard to the remaining allegations of paragraph 10, the Defendant is, after reasonable investigation, without information

sufficient to form a belief as to the averments of paragraph No. 12 of Plaintiff's Complaint, therefore, the same are denied and strict proof is demanded at the time of trial.

17. Defendant denies allegations of carelessness and recklessness generally and specifically denies the remaining allegations pursuant to Pa.R.C.P. Rule 1029(e). By way of further answer, however, Defendant Reasinger admits negligence and accepts responsibility for the subject accident.

WHEREFORE, Defendant Reasinger demands judgment in his favor.

NEW MATTER

18. Plaintiff's claims are limited by application of the Pennsylvania Motor Vehicle Financial Responsibility Law relating to the preclusion of recovery of first party benefits.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By




Matthew B. Taladay, Esq.
Attorney for Defendant

VERIFICATION

I, **John Reasinger**, do hereby verify that I have read the foregoing Answer and New Matter. The statements therein are correct to the best of my personal knowledge or information and belief.

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

Date: 1-14-08



John Reasinger

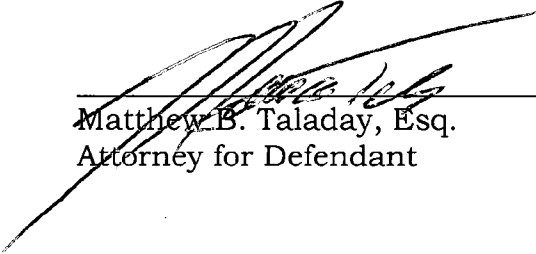
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

MELISSA MOTTERN, also known as :	:	
MELISSA PETERMAN,	:	
Plaintiff	:	
	:	
vs.	:	No. 2007-1750-CD
	:	
JOHN REASINGER,	:	
Defendant	:	

CERTIFICATE OF SERVICE

I certify that on the 23rd day of January, 2008, a true and correct copy of Defendant's Answer and New Matter was sent via first class mail, postage prepaid, to the following:

Laurence B. Green, Esq.
Attorney for Plaintiff
Berger and Green, P.C.
5850 Ellsworth Avenue, Suite 200
Pittsburgh, PA 15232


Matthew B. Taladay, Esq.
Attorney for Defendant

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

FILED

FEB 04 2008

m/8-30/08
William A. Shaw
Prothonotary/Clerk of Courts
no c/c GR

MELISSA MOTTERN, also known as
MELISSA PETERMAN,

Plaintiff,

vs.

JOHN REASINGER,

Defendant.

No.: 2007-1750-CD

REPLY TO NEW MATTER

Filed on Behalf of Melissa Mottern,
also known as Melissa Peterman,
Plaintiff

Counsel of Record for this party:

Laurence B. Green, Esquire

Pa. I.D. # 10399

Mark E. Milsop, Esquire

Pa. I.D. #66069

BERGER AND GREEN, P.C.

Firm #777

5850 Ellsworth Avenue

Suite 200

Pittsburgh, PA 15232

(412) 661-1400

lawyer@bergerandgreen.com

JURY TRIAL DEMANDED

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

MELISSA MOTTERN, also known as	:	No.: 2007-1750-CD
MELISSA PETERMAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JOHN REASINGER,	:	
	:	
Defendant.	:	

REPLY TO NEW MATTER

AND NOW, comes the Plaintiff, by her attorneys Berger and Green with the following
Reply to New Matter:

18. The averments contained in paragraph 18 of Defendant's New Matter constitute
conclusions of law or other conclusions to which no response is required.

Respectfully submitted,

BERGER AND GREEN, P.C.

By: Mark E. Milsop
Mark E. Milsop, Esquire
Attorney for the Plaintiff

VERIFICATION

I verify that the statements made in the REPLY TO NEW MATTER are true and correct; that the attached REPLY TO NEW MATTER is based upon information which I have furnished to my counsel and information which has been gathered by my counsel in the preparation of the lawsuit. The language of the REPLY TO NEW MATTER is that of counsel and not the plaintiff. I have read the REPLY TO NEW MATTER and to the extent that the REPLY TO NEW MATTER is based upon information which I have given to my counsel, it is true and correct to the best of my knowledge, information and belief. To the extent that the content of the REPLY TO NEW MATTER is that of counsel, I have relied upon counsel in making this Verification. I understand that false statements herein made are subject to the penalties of 18 Pa. CONS. STAT §4904 relating to unsworn falsification to authorities.

DATED: 11-30-08

Melissa A. Mottern
Melissa Mottern

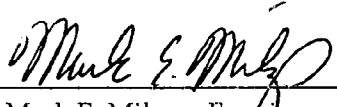
CERTIFICATE OF SERVICE

I Mark E. Milsop, Esquire hereby certify that a true and correct copy of the foregoing Reply to New Matter has been mailed by U.S. Mail to counsel of record via first class mail, postage pre-paid, this 31st day of January, 2008:

Matthew B. Taladay, Esquire
Hanak, Guido and Taladay
528 Liberty Boulevard
Dubois, PA 15801

Respectfully submitted,

BERGER AND GREEN, P.C.

By: 
Mark E. Milsop, Esquire
Attorney for the Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103364
NO: 07-1750-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: MELISSA MOTTERN a/k/a MELISSA PETERMAN
vs.
DEFENDANT: JOHN REASINGER

SHERIFF RETURN

NOW, October 30, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON JOHN REASINGER.

NOW, November 01, 2007 AT 3:40 PM SERVED THE WITHIN COMPLAINT ON JOHN REASINGER, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

FILED
FEB 13 2008
0/1:30/2
William A. Shaw
Prothonotary/Clerk of Courts

FILED
1/27/08
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103364
NO: 07-1750-CD
SERVICES 1
COMPLAINT

PLAINTIFF: MELISSA MOTTERN a/k/a MELISSA PETERMAN
vs.
DEFENDANT: JOHN REASINGER

SHERIFF RETURN

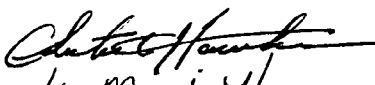
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	BERGER	12257	10.00
SHERIFF HAWKINS	BERGER	12257	21.00
JEFFERSON CO.	BERGER	12258	39.40

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,


by Marilyn Hamer
Chester A. Hawkins
Sheriff

No. 07-1750 C.D.

Personally appeared before me, Harry Dunkle, Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on November 1, 2007 at 3:40 o'clock P.M. served the Notice and Complaint upon JOHN REASINGER, Defendant, at the address of 69 Britton Drive, Borough of Falls Creek, County of Jefferson, State of Pennsylvania, by handing to John Ross Reasinger, son of the defendant and adult person in charge at time of service, a true copy of the Notice and Complaint and by making known to him the contents thereof.

Advance Costs Received:	\$125.00	
My Costs:	37.40	Paid
Prothy:	2.00	
Total Costs:	39.40	
REFUNDED:	\$ 85.60	

Sworn and subscribed

to before me this 5th

day of November 2007

By Kristen J. Hoffman
Deputy Clerk of Courts

My Commission Expires the
1st Monday, January 2010

So Answers,

Harry Dunkle Deputy

Thomas A. Demko Sheriff

JEFFERSON COUNTY, PENNSYLVANIA

William A. Shaw
Prothonotary/Clerk of Courts

FILED

William A. Shaw
Prothonotary/Clerk of Courts

FEB 13 2008

FILED

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

FILED

MAR 20 2008

m / 10:30 / W
William A. Shaw
Prothonotary/Clerk of Courts
No 4/C (4)

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

vs. :

JOHN REASINGER, :
Defendant :

Type of Case: Civil Action

No. 2007-1750-CD

Type of Pleading:

Notice of
Service

Filed on Behalf of:
Defendant

Counsel of Record for This
Party:

Matthew B. Taladay, Esq.
Supreme Court No. 49663
Hanak, Guido and Taladay
528 Liberty Boulevard
P.O. Box 487
DuBois, PA 15801
(814) 371-7768

Dated: 03/19/08

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

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

vs. :

No. 2007-1750-CD

JOHN REASINGER, :
Defendant :

NOTICE OF SERVICE

I, Matthew B. Taladay, of Hanak, Guido and Taladay, being
counsel of record for Defendant, do hereby certify that I propounded on
Plaintiff, via United States mail, first class, postage pre-paid, this 19th
day of March, 2008, Defendant's FIRST SET OF DISCOVERY
MATERIALS to the below indicated person, at said address, being
counsel of record for the Plaintiff:

MarkE. Milsop, Esq.
Attorney for Plaintiff
Berger and Green, P.C.
5850 Ellsworth Avenue, Suite 200
Pittsburgh, PA 15232


Matthew B. Taladay, Esq.
Attorney for Defendant

William A. Shaw
Prothonotary/Clerk of Courts

MAR 20 2006

FILED

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

MELISSA MOTTERN, also known as :	Type of Case: Civil Action
MELISSA PETERMAN, :	
Plaintiff :	No. 2007-1750-CD
vs. :	Type of Pleading:
JOHN REASINGER, :	Certificate of
Defendant :	Service
:	Filed on Behalf of:
:	Defendant
:	Counsel of Record for This
:	Party:
:	Matthew B. Taladay, Esq.
:	Supreme Court No. 49663
:	Hanak, Guido and Taladay
:	528 Liberty Boulevard
:	P.O. Box 487
:	DuBois, PA 15801
:	(814) 371-7768

Dated: 04/28/08

FILED *no cc*
M 10:36 AM
APR 29 2008
William A. Shaw
Prothonotary/Clerk of Courts

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

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

vs. :

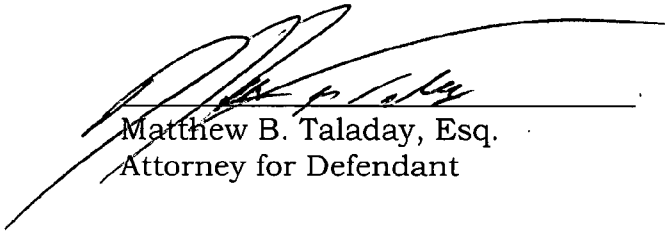
No. 2007-1750-CD

JOHN REASINGER, :
Defendant :

CERTIFICATE OF SERVICE

I certify that on the 28th day of April, 2008, an original
Notice of Deposition, copy of which is attached hereto, was sent via first
class mail, postage prepaid, to the following:

Mark E. Milsop, Esq.
Attorney for Plaintiff
Berger and Green, P.C.
5850 Ellsworth Avenue, Suite 200
Pittsburgh, PA 15232



Matthew B. Taladay, Esq.
Attorney for Defendant

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

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

vs. :

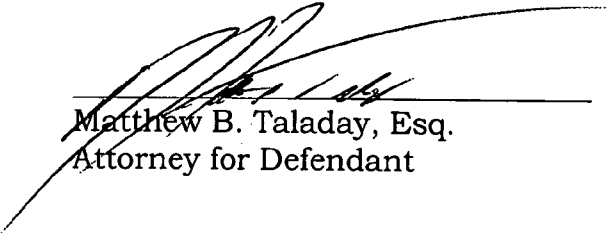
No. 2007-1750-CD

JOHN REASINGER, :
Defendant :

NOTICE OF DEPOSITION

TO: MELISSA MOTTERN, a/k/a MELISSA PETERMAN
c/o Mark Milsop, Esq.

TAKE NOTICE that your deposition by oral examination will
be taken on **Thursday, May 22, 2008 at 1:00 p.m.** at the law office of
Hanak, Guido and Taladay, 528 Liberty Boulevard, DuBois,
Pennsylvania. This deposition is being taken for the purpose of discovery
and for use at trial, pursuant to the Pennsylvania Rules of Civil
Procedure regarding Discovery.



Matthew B. Taladay, Esq.
Attorney for Defendant

cc: Schreiber Court Reporting

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

MELISSA MOTTERN, also known as
MELISSA PETERMAN,

Plaintiff,

vs.

JOHN REASINGER,

Defendant.

No.: 2007-1750-CD

**NOTICE OF SERVICE OF
ANSWERS TO INTERROGATORIES
AND RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS**

Filed on Behalf of Melissa Mottern,
also known as Melissa Peterman,
Plaintiff

Counsel of Record for this party:

Mark E. Milsop, Esquire
Pa. I.D. # 66069
Sam H. Jessee, Esquire
Pa. I.D. #85748
BERGER AND GREEN, P.C.
Firm #777
5850 Ellsworth Avenue
Suite 200
Pittsburgh, PA 15232
(412) 661-1400
lawyer@bergerandgreen.com

JURY TRIAL DEMANDED

FILED *no cc*
3/19/18
MAY 05 2008

William A. Shaw
Prothonotary/Clerk of Courts

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

MELISSA MOTTERN, also known as
MELISSA PETERMAN,

Plaintiff,

vs.

JOHN REASINGER,

Defendant.

: No.: 2007-1750-CD
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**NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES AND
RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS**

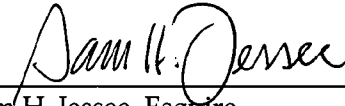
I hereby certify that true and correct copies of Plaintiff's Answers to Interrogatories and Response to Request for Production of Documents were served by first class, U.S. Mail, postage pre-paid, this 2nd day of May, 2008, on the party listed below:

Matthew B. Taladay, Esquire
Hanak, Guido and Taladay
528 Liberty Boulevard
Dubois, PA 15801

Respectfully submitted,

BERGER AND GREEN, P.C.

By: _____


Sam H. Jessee, Esquire
Attorney for the Plaintiff

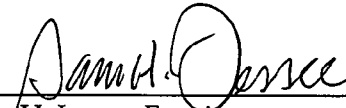
CERTIFICATE OF SERVICE

I, Sam H. Jessee, Esquire, hereby certify that a true and correct copy of the within Notice of Service of Interrogatories and Request for Production of Documents was served upon the following counsel of record by regular first class mail this 2nd date of May, 2008.

Matthew B. Taladay, Esquire
Hanak, Guido and Taladay
528 Liberty Boulevard
Dubois, PA 15801

Respectfully submitted,

BERGER AND GREEN, P.C.

By: 
Sam H. Jessee, Esquire
Attorney for the Plaintiff

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

FILED

APR 01 2009

M/10:20/09

William A. Shaw
Prothonotary Clerk of Courts

NO CERT. COPY

SENT TO

TALAMZ

MELISSA MOTTERN, also known as :
MELISSA PETERMAN, :
Plaintiff :

Type of Case: Civil Action

No. 2007-1750-CD

vs. :

Type of Pleading:

Præcipe for

Discontinuance

JOHN REASINGER, :
Defendant :

Filed on Behalf of:
Plaintiff

Counsel of Record for This
Party:

Sam H. Jessee, Esq.

Supreme Court No. 85748

Berger and Green, P.C.

5850 Ellsworth Avenue

Suite 200

Pittsburgh, PA 15232

(412) 661-1400

lawyer@bergerandgreen.com

Dated: March 27, 2009

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

MELISSA MOTTERN, also known as :

MELISSA PETERMAN, :

Plaintiff :

vs. :

No. 2007-1750-CD

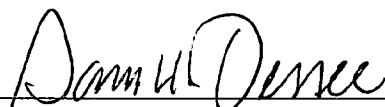
JOHN REASINGER, :

Defendant :

PRAECIPE FOR DISCONTINUANCE

TO THE PROTHONOTARY:

Please mark the above case settled and discontinued.



Sam H. Jessee, Esq.
Attorney for Plaintiff

11
30

85-

William A. Shaw
Promotional Clerk of Courts

APR 01 2009

FILED

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

CIVIL DIVISION

**Melissa Mottern, also known as
Melissa Peterman**

Vs.

No. 2007-01750-CD

John Reasinger

CERTIFICATE OF DISCONTINUATION

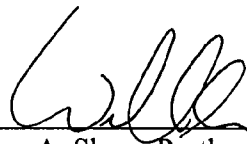
Commonwealth of PA
County of Clearfield

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 1, 2009, marked:

Settled and Discontinued.

Record costs in the sum of \$85.00 have been paid in full by Berger and Green, P.C..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 1st day of April A.D. 2009.



William A. Shaw, Prothonotary