

08-175-CD

Kenneth Shaffer vs L. Knappenberger

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CIVIL ACTION – LAW

KENNETH SCHAFFER, individually : No. 08-175-CD
and d/b/a KEN SCHAFFER :
EXCAVATION :
104 Mahoning Street :
DuBois, PA 15801 :
Plaintiff :
VS. :
Type of Case: **Arbitration**
LEIGHANN KNAPPENBERGER :
52 Harper Road :
DuBois, PA 15801 :
Defendant :
Type of Pleading: **Complaint**
Filed on Behalf of Plaintiff:
Kenneth Schaffer, Individually
and D/B/A Ken Schaffer
Excavation
Counsel of Record for Plaintiff:
Thomas S. Brumbaugh, Esquire
Supreme Court No.: 89037
Thomas, Thomas & Hafer, LLP
305 N. Front Street, 6th Floor
P.O. Box 999
Harrisburg, PA 17108-0999
(717) 441-7060
Fax: (717) 237-7105

FILED Atty pd \$5.00
M 1/44/08
FEB 01 2008
S 1CC Atty
William A. Shaw
Prothonotary/Clerk of Courts
1CC Sheriff

Date: January 30, 2008

Thomas S. Brumbaugh, Esquire
Attorney I.D. No. 89037
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 441-7060
e-mail: tbrumbaugh@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFER, individually
and d/b/a **KEN SCHAFER EXCAVATION**
104 Mahoning Street
DuBois, PA 15801
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
52 Harper Road
DuBois, PA 15801
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: _____

CIVIL ACTION -LAW

ARBITRATION

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 other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

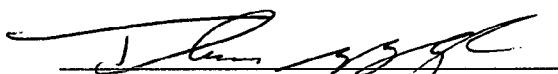
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

David S. Meholic, Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830

Respectfully submitted,
THOMAS, THOMAS & HAVER, LLP

Date: January 30, 2008


Thomas S. Brumbaugh, Esquire
Attorney I.D. No.: 89037
P. O. Box 999
Harrisburg, PA 17108
(717) 441-7060
e-mail: tbrumbaugh@tthlaw.com

Thomas S. Brumbaugh, Esquire
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THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 441-7060
e-mail: tbrumbaugh@ithlaw.com

Attorneys for Plaintiff

KENNETH SCHAFFER, individually
and d/b/a **KEN SCHAFFER EXCAVATION**
104 Mahoning Street
DuBois, PA 15801
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
52 Harper Road
DuBois, PA 15801
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: _____

CIVIL ACTION – LAW

ARBITRATION

COMPLAINT

1. Kenneth Schaffer is an adult individual who does business as Ken Schaffer Excavation, and who has an address of 104 Mahoning Street, DuBois, PA 15801.
2. Leighann Knappenberger is an adult individual who resides at 52 Harper Road, DuBois, PA 15801.
3. On or about June 3, 2007, Kenneth R. Schaffer was operating a 2004 Ford F150 XL pick up owned by Kenneth Schaffer individually and d/b/a Ken Schaffer Excavation (hereinafter referred to as the "Schaffer Vehicle") on Platt Road in or near Sandy Township, Clearfield County, Pennsylvania.

4. At the same time, Defendant, Leighann Knappenberger, was operating a 1991 Ford Explorer on Harper Road.

5. At the intersection of Platt Road and Harper Road, there is a stop sign for traffic traveling on Harper Road, but not for traffic traveling on Platt Road.

6. As Plaintiff's vehicle entered the intersection, Defendant pulled from the stop sign directly into the path of Plaintiff's vehicle, striking Plaintiff's vehicle in the front end.

COUNT I

Plaintiff, Kenneth Schaffer, individually and d/b/a Ken Schaffer Excavation
v. Defendant, Leighann Knappenberger

7. Plaintiff incorporates herein by reference, as if quoted in their entirety, the averments set forth within paragraphs 1 through 6 of this Complaint.

8. The aforementioned accident was caused by the negligence and/or carelessness of Defendant, Leighann Knappenberger, in that she:

- a. Failed to use due care under the circumstances;
- b. Failed to maintain proper control of her vehicle;
- c. Failed to maintain a proper lookout;
- d. Failed to stop for a stop sign in violation of the Pennsylvania Motor Vehicle Code;
- e. Failed to yield the right of way to Plaintiff;
- f. Operated her vehicle too fast for conditions then existing in violation of the Pennsylvania Motor Vehicle Code;
- g. Operated her vehicle at an unsafe and excessive rate of speed;
- h. Failed to pay adequate attention to the traffic and road conditions;
- i. Failed to see Plaintiff's vehicle which was in open view;
- j. Failed to stop before colliding with Plaintiff's vehicle;

- k. Caused a collision with Plaintiff's vehicle;
- l. Failed to take evasive action to avoid the accident; and
- m. Did not pay attention while operating a motor vehicle.

9. As a direct and proximate result of the negligence and carelessness of Defendant, Plaintiff's vehicle sustained damages.

10. As a direct and proximate result of the negligence and carelessness of Defendant, Plaintiff lost the use of his vehicle.

WHEREFORE, Kenneth Schaffer, individually and d/b/a Ken Schaffer Excavation demands judgment in its favor and against Defendant Leighann Knappenberger in an amount within the jurisdictional amount requiring arbitration, together with interest, delay damages and such other damages as this Court deems appropriate.

Respectfully submitted,
THOMAS, THOMAS & HAVER, LLP

Date: January 30, 2008



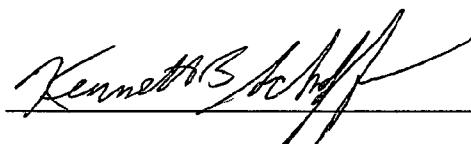
Thomas S. Brumbaugh, Esquire
Attorney I.D. No.: 89037
P. O. Box 999
Harrisburg, PA 17108
(717) 441-7060
e-mail: tbrumbaugh@tthlaw.com

VERIFICATION

I, Kenneth Schaffer, verify that the attached document is based upon information which has been gathered by me, my counsel and/or others on my behalf in preparation of this lawsuit. The language of the document is that of counsel and is not mine. I have read the document, and to the extent that it is based upon information which I have given to my counsel, subject to inadvertent or undiscovered errors, it is true and correct to the best of my knowledge, information, and belief based upon, and therefore limited by, the records and information still in existence, presently recollected, and/or thus far discovered in the course of preparing this document, reserving the right to make any changes thereto should any omissions or errors be discovered, or should more accurate information become available. To the extent that the contents of the document are that of counsel, I have relied upon counsel in making this verification.

I understand that intentional false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsifications made to authorities.

Date: 1-16-08



Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFFER, individually
and d/b/a **KEN SCHAFFER EXCAVATION**
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW

ARBITRATION

PRAECLPICE TO SUBSTITUTE ENTRY OF APPEARANCE

TO THE PROTHONOTARY;

Please enter my appearance, Corey J. Adamson, Esquire, as attorney of record on behalf of Plaintiff in the above-captioned matter, and withdraw the appearance of Thomas S. Brumbaugh, Esquire.

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP

Date: *4-2-08*

Corey J. Adamson, Esquire
Attorney I.D. No.: 204508
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

FILED *acc Atty*
1/3/30 LM Adamson.
APR 9 2008
(JM)
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I, Sherry Hauenstein, a secretary at the Law Firm of Thomas, Thomas & Hafer, LLP do hereby certify that on this day I served a true and correct copy of the foregoing documents by first class mail, postage pre-paid, addressed to the following:

Leighann Knappenberger
257 Campbell Ave
Leechburg, PA 15656

4-9-08

Date

581847.1

Sherry Hauenstein

Sherry Hauenstein

KENNETH SCHAFFER, individually
and d/b/a KEN SCHAFFER
EXCAVATION

Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION - LAW

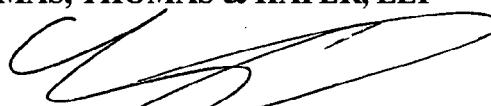
ARBITRATION

**NOTICE OF INTENT TO SERVE SUBPOENAS
TO PRODUCE DOCUMENTS AND THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.21**

Plaintiff intends to serve subpoenas identical to the ones that are 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 subpoenas. If no objection is made, the subpoenas may be served.

THOMAS, THOMAS & HAVER, LLP

By: 

Corey J. Adamson, Esquire
Identification Number: 204508
305 North Front Street
P.O. Box 999
Harrisburg, PA 17108-0999
(717) 255-7639
Attorney for Plaintiff

Date: 

FILED NO CC
m 10:44 AM
APR 14 2008
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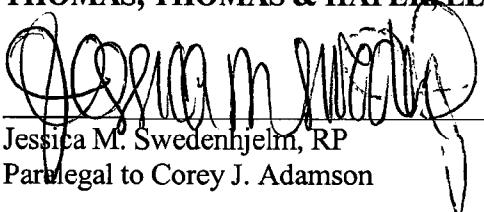
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I, Jessica M. Swedenhjelm, Paralegal for the law firm Thomas, Thomas, Thomas & Hafer, LLP, hereby certify that I have served a true and correct copy of the foregoing document on the following persons by placing a copy of the same in the United States mail, first class mail, directed to their office addresses as follows:

Leighann Knappenberger
257 Campbell Ave
Leechburg, PA 15656

THOMAS, THOMAS & HAFER, LLP



Jessica M. Swedenhjelm, RP
Paralegal to Corey J. Adamson

Date: 4/8/08

KENNETH SCHAFFER, individually
and d/b/a KEN SCHAFFER EXCAVATION
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW
ARBITRATION

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

Custodian of Records, Geico Insurance Company, One Geico Blvd., Fredericksburg, Virginia 22412

(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:

A complete copy of all records pertaining to Leighann Knappenberger including, but not limited to:
accident reports, wage loss verifications, applications for benefits, summary of payments, medical
records and reports, reports of independent medical exams, reports of diagnostic studies,
surveillance reports and films, recorded statements, photographs, correspondence, first party
benefits, and memos

at THOMAS, THOMAS & HAVER, LLP, 305 N. Front Street, P.O. Box 999, Harrisburg, PA 17108.

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: Corey J. Adamson, Esquire

Prothonotary/Clerk, Civil Division

ADDRESS 305 N. Front Street, P. O. Box 999

Harrisburg, PA 17108

TELEPHONE: (717) 255-7639

Deputy

SUPREME COURT ID No: 204508

ATTORNEY FOR: Plaintiff

DATE:

Seal of the Court

KENNETH SCHAFFER, individually
and d/b/a KEN SCHAFFER
EXCAVATION

Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION - LAW

ARBITRATION

FILED

MAY 05 2008

112-3066
William A. Shaw
Prothonotary/Clerk of Courts

**CERTIFICATE
PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22**

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Plaintiffs certify that

- (1) a Notice of Intent to Serve the Subpoenas with a copy of the subpoenas attached thereto was mailed to Plaintiffs' counsel on 4/8/08;
- (2) a copy of the Notice of Intent, including the proposed subpoenas, is attached to this certificate;
- (3) more than twenty-days have passed and no objections have been received.
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the Notice of Intent to serve the subpoenas.

THOMAS, THOMAS & HAVER, LLP



By: _____

Corey J. Adamson, Esquire
Identification Number: 204508
305 North Front Street
P.O. Box 999
Harrisburg, PA 17108-0999
(717) 255-7639
Attorney for Plaintiff

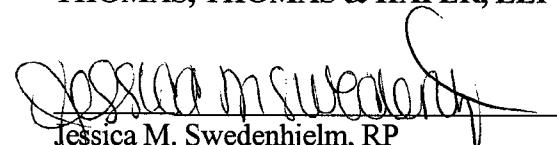
Date: 5/1/08

CERTIFICATE OF SERVICE

I, Jessica M. Swedenhjelm, Paralegal for the law firm Thomas, Thomas, Thomas & Hafer, LLP, hereby certify that I have served a true and correct copy of the foregoing document on the following persons by placing a copy of the same in the United States mail, first class mail, directed to their office addresses as follows:

Leighann Knappenberger
257 Campbell Ave
Leechburg, PA 15656

THOMAS, THOMAS & HAFER, LLP



Jessica M. Swedenhjelm, RP
Paralegal to Corey J. Adamson

Date: 5/1/08

KENNETH SCHAFFER, individually
and d/b/a KEN SCHAFFER EXCAVATION

Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION - LAW

ARBITRATION

**NOTICE OF INTENT TO SERVE SUBPOENAS
TO PRODUCE DOCUMENTS AND THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.21**

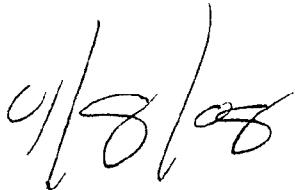
Plaintiff intends to serve subpoenas identical to the ones that are attached to this notice.

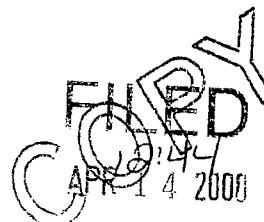
You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

THOMAS, THOMAS & HAVER, LLP

By: 

Corey J. Adamson, Esquire
Identification Number: 204508
305 North Front Street
P.O. Box 999
Harrisburg, PA 17108-0999
(717) 255-7639
Attorney for Plaintiff

Date: 



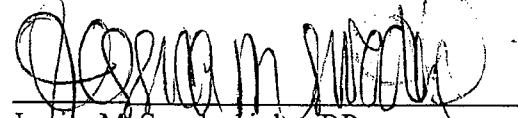
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I, Jessica M. Swedenhjelm, Paralegal for the law firm Thomas, Thomas, Thomas & Hafer, LLP, hereby certify that I have served a true and correct copy of the foregoing document on the following persons by placing a copy of the same in the United States mail, first class mail, directed to their office addresses as follows:

Leighann Knappenberger
257 Campbell Ave
Leechburg, PA 15656

THOMAS, THOMAS & HAFER, LLP



Jessica M. Swedenhjelm, RP
Paralegal to Corey J. Adamson

Date: 4/8/08

KENNETH SCHAFFER, individually
and d/b/a KEN SCHAFFER EXCAVATION
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW

ARBITRATION

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

Custodian of Records, Geico Insurance Company, One Geico Blvd., Fredericksburg, Virginia 22412

(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:

A complete copy of all records pertaining to Leighann Knappenberger including, but not limited to: accident reports, wage loss verifications, applications for benefits, summary of payments, medical records and reports, reports of independent medical exams, reports of diagnostic studies, surveillance reports and films, recorded statements, photographs, correspondence, first party benefits, and memos.

at THOMAS, THOMAS & HAVER, LLP, 305 N. Front Street, P.O. Box 999, Harrisburg, PA 17108.

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: Corey J. Adamson, Esquire

Prothonotary/Clerk, Civil Division

ADDRESS 305 N. Front Street, P. O. Box 999

Harrisburg, PA 17108

TELEPHONE: (717) 255-7639

Deputy

SUPREME COURT ID No: 204508

ATTORNEY FOR: Plaintiff

DATE:

Seal of the Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103706
NO: 08-175-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: KENNETH SCHAFFER, individually and d/b/a KEN SCHAFFER EXCAVATION
VS.
DEFENDANT: LEIGHANN KNAPPENBERGER

SHERIFF RETURN

NOW, February 22, 2008, SHERIFF OF ARMSTRONG COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON LEIGHANN KNAPPENBERGER.

NOW, February 27, 2008 AT 2:07 PM SERVED THE WITHIN COMPLAINT ON LEIGHANN KNAPPENBERGER,
DEFENDANT. THE RETURN OF ARMSTRONG COUNTY IS HERETO ATTACHED AND MADE PART OF THIS
RETURN.

FILED
01/25/08
MAY 21 2008
WM
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103706
NO: 08-175-CD
SERVICES 1
COMPLAINT

PLAINTIFF: KENNETH SCHAFFER, individually and d/b/a KEN SCHAFFER EXCAVATION
vs.
DEFENDANT: LEIGHANN KNAPPENBERGER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	THOMAS	134682	10.00
SHERIFF HAWKINS	THOMAS	134682	40.60
ARMSTRONG CO.	THOMAS	135380	41.00

Sworn to Before Me This

So Answers,

____ Day of _____ 2008


Chester A. Hawkins
Sheriff

SHERIFF'S RETURN - REGULAR

CASE NO: 2008-00175 T

COMMONWEALTH OF PENNSYLVANIA:
COUNTY OF Armstrong CountyKENNETH SCHAFFER

VS

LEIGHANN KNAPPENBERGER

RONALD J POLLICK, Sheriff or Deputy Sheriff of Armstrong County, Pennsylvania, who being duly sworn according to law, says, the within COMPLAINT as served upon KNAPPENBERGER LEIGHANN the DEFENDANT, at 0014:07 Hour, on the 27th day of February, 2008 at 257 CAMPBELL AVENUE LEECHBURG, PA 15656, Armstrong County Pennsylvania, by handing to IRENE CYPHER APIC-GRANDMOTHER a true and attested copy of the COMPLAINT ;

and at the same time directing Her attention to the contents thereof.

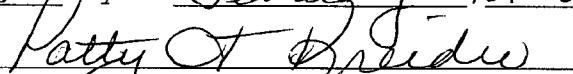
Sheriff's Costs:

Docketing	9.00
Service	9.00
Affidavit	5.00
Surcharge	.00
	18.00

So answers,


Larry Crawford, Sheriff41.00 02/25/2008
THOMAS THOMAS & HAFER LLP By

Sworn and subscribed to before me


Ronald J. Pollick
Deputy Sheriffthis 28th day of February, 2008 A.D. _____
Patty J. Kreider
Notary

NOTARIAL SEAL
PATTY J. KREIDER, NOTARY PUBLIC
KITTANNING BORO., ARMSTRONG COUNTY
MY COMMISSION EXPIRES OCT. 11, 2008

' Case No 2008-00175 T
KENNETH SCHAFFER (VS) LEIGHANN KNAPPENBERGER

Date
Filed

2/25/08 COMPLAINT WITH NOTICE, FILED. TIME STAMPED 10:56AM, RECEIVED FROM CLEARFIELD COUNTY SHERIFF'S DEPARTMENT. WE ARE TO SERVE LEIGHANN KNAPPENBERGER AT 257 CAMPBELL AVENUE, LEECHBURG, PA. 15656.

2/27/08 AT 2:07 PM, DEPUTY RONALD J POLICK SERVED THE WITHIN ARBITRATION COMPLAINT UPON THE DEFENDANT, LEIGHANN KNAPPENBERGER, BY PERSONALLY HANDING TO IRENE CYPER, ADULT PERSON IN CHARGE-GRANDMOTHER, AT 257 CAMPBELL AVENUE, LEECHBURG, ARMSTRONG COUNTY, PENNSYLVANIA, A TRUE AND ATTESTED COPY OF SAID ARBITRATION COMPLAINT AND INFORMED HER OF THE CONTENTS THEREIN.

2/28/08 RETURNED TO CLEARFIELD COUNTY SHERIFF'S OFFICE.
COPY SENT FOR ATTORNEY.
SO ANSWERS LARRY R CRAWFORD, SHERIFF.



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641
FAX (814) 765-5915

ROBERT SNYDER
CHIEF DEPUTY
MARILYN HAMM
DEPT. CLERK

CYNTHIA AUGHENBAUGH
OFFICE MANAGER

KAREN BAUGHMAN
CLERK TYPIST

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 103706

TERM & NO. 08-175-CD

KENNETH SCHAFFER, individually and d/b/a KEN SCHAFFER EXCAVATION

COMPLAINT

vs.

LEIGHANN KNAPPENBERGER

SERVE BY: 03/02/08
COURT DATE:

MAKE REFUND PAYABLE TO ATTORNEY MAILING ADVANCE DIRECT

SERVE: LEIGHANN KNAPPENBERGER

ADDRESS: 257 CAMPBELL AVE., LEECHBURG, PA 15656

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby depose the SHERIFF OF ARMSTRONG COUNTY, Pennsylvania to execute this writ. This Deposition being made at the request and risk of the Plaintiff this day, February 22, 2008.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFFER, individually
and d/b/a **KEN SCHAFFER EXCAVATION**
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW

ARBITRATION

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

PLEASE ENTER a Default Judgment against Defendant Leighann Knappenberger in the above captioned action for failure to Answer or otherwise plead to the Complaint. Plaintiff hereby certifies that Notice of Plaintiff's Intention to Enter Judgment by Default was mailed to Defendant Leighann Knappenberger at her last known address pursuant to Pa.R.C.P. 237.5 on May 23, 2008, a copy of which is attached hereto and incorporated herein. An affidavit of non-military service is also attached hereto.

FILED Atty pd. #00.00
M 12/03/08
AUG 28 2008 Notice to Def.

William A. Shaw Statement to
Prothonotary/Clerk of Courts Atty

(60)

Please enter judgment against Defendant Leighann Knappenberger in the amount of \$13,527.60, which is a sum certain/a sum made certain by computation, as shown in the attached invoice for damages and subrogation receipt, within this said action for subrogation.

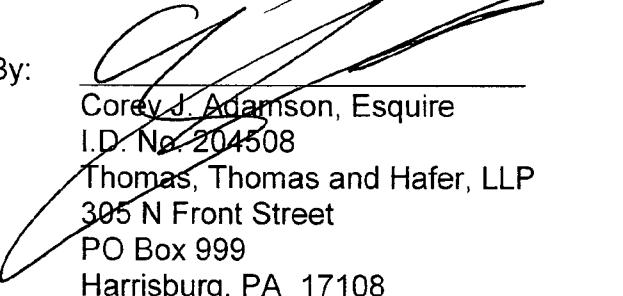
Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP

Date:

8/26/08

By:


Corey J. Adamson, Esquire
I.D. No. 204508

Thomas, Thomas and Hafer, LLP
305 N Front Street
PO Box 999
Harrisburg, PA 17108
(717) 255-7639
Attorneys for Plaintiff

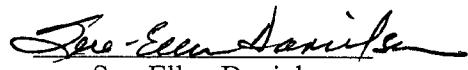
CERTIFICATE OF SERVICE

AND NOW, this 26 day of August, 2008, I, Sue-Ellen Danielsen, an employee of the law firm of Thomas, Thomas & Hafer, LLP, hereby certify that I sent a true and correct copy of the foregoing document by placing a copy of the same in the United States Mail, postage prepaid, to the following:

Leighann Knappenberger
257 Campbell Ave
Leechburg, PA 15656

Leighann Knappenberger
135 Beale Avenue
Leechburg, PA 15656

Leighann Knappenberger
102 15th Street
Vandergrift, PA 15690


Sue-Ellen Danielsen

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFER, individually
and d/b/a KEN SCHAFER EXCAVATION
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

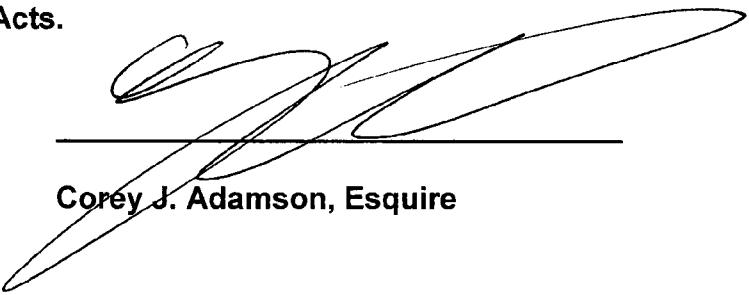
NO.: 08-175-CD

CIVIL ACTION – LAW

ARBITRATION

AFFIDAVIT OF NON-MILITARY SERVICE

I, Corey J. Adamson, Esquire, being duly sworn according to law, deposes and says that Defendant Leighann Knappenberger, to the best of my knowledge, is not in the military service and is not otherwise subject to the provisions of the Soldiers' and Sailors' Civil Relief Acts.

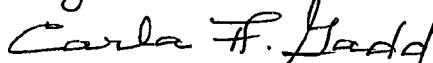


Corey J. Adamson, Esquire

Dated:

Sworn to Before me this 26th

day of August, 2008.



Carla A. Gadd

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

CARLA A. GADD, Notary Public
City of Lancaster, Lancaster County
My Commission Expires July 25, 2010

595833-1

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFER, individually
and d/b/a **KEN SCHAFER EXCAVATION**
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW

ARBITRATION

NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT

TO: DEFENDANT **LEIGHANN KNAPPENBERGER**
52 Harper Road
DuBois, Pennsylvania 15801

and

135 Beale Avenue
Leechburg, PA 15656

DATE OF NOTICE: May 23, 2008

IMPORTANT NOTICE

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

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

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

David S. Meholic, Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 Ext. 50-51

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP



Date: May 27, 2008

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

581841.2

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3; Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

LEIGHANN KNAPPENBERGER
52 HARPER ROAD
DUBUQUE, IA 52001

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

Leighann Knappenberger

 Agent Addressee**B. Received by (Printed Name)**

Leighann Knappenberger

C. Date of Delivery

6/7/08

D. Is delivery address different from item 1? Yes**If YES, enter delivery address below: No**

*135 BEALE AVE
LEETBURG PA 15656*

3. Service Type

<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.

4. Restricted Delivery? (Extra Fee) Yes**2. Article Number**

(Transfer from service label)

7007-8220 0001 4374 3639

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

Schaffer

Knappenberger

348 - 71824

Payments and Recoveries for Claim 04372434
As of

Claimant Name: KENNETH SCHAFFER EXCAVATION **Coverage:** AUTO PHYSICAL DAMAGE COLL

Loss Type: Collision

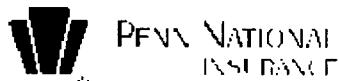
Monetary Types: Loss Payment~Supplemental Payment

From:

To:

Adjuster: Toni Williams

PAYMENT	ISSUE DATE	ACTION	AMOUNT	PAYEE	CHECK_NUM	RESERVE_TYPE	MONETARY_TYPE	FROM_DATE	TO_DATE	INVOICE_NUM
	07/31/2007	PYMT	\$11,606.97	KENNETH SCHAFFER EXCAVATION	1050065058	LOSS	Loss Payment			
	08/07/2007	PYMT	\$920.63	MURRAYS FORD INC	1050065543	LOSS	Supplemental Payment			
LOSS			\$12,527.60							
TOTAL PAYMENT			\$12,527.60							



AUTO/HEAVY EQUIPMENT APPRAISAL COVER SHEET

DATE: 7/3/07

CLAIM NUMBER: <u>04372434</u>	APPRaiser: <u>Tom Sanker</u>
VEHICLE OWNER: <u>Ken Schaffer Exc.</u>	CLAIM REP: <u>Toni Williams</u>

REPAIRABLE

TOTAL LOSS

GROSS APPRAISAL <u>12606.97</u>	NET ACV _____
LESS DEDUCTIONS: - _____	DEDUCTIONS: - _____
DEDUCTIBLE: - <u>1000.00</u>	TAX: + _____ DEDUCTIBLE: - _____
TOTAL: <u>11606.97</u>	TOTAL: _____
DRIVABLE: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	SALVAGE MOVED: YES <input type="checkbox"/> NO <input type="checkbox"/>
AGREED PRICE: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	SALVAGE POOL:
DAYS TO REPAIR: <u>15</u>	STOCK# _____
Pittsburgh CSO	SALVAGE VALUE: _____ Salvage Direct 814-827-0300

COMMENTS:

CLOSING REPORT <input checked="" type="checkbox"/>
STATUS REPORT <input type="checkbox"/>
Found a front End, but not cost effective. Shop has agreed to open up the front of this vehicle and if they find additional damage, they are to call me as soon as possible.

Date: 7/3/2007 10:19 AM
Estimate ID: S07A48174
Estimate Version: 0
Preliminary
Profile ID: CUSTOMIZED

***** NO SUPPLEMENT WITHOUT PRIOR APPROVAL *****

D. L. DRAVIS & ASSOCIATES, INC.

711 9th AVENUE, ALTOONA, PA 16602
(814) 943-6155
Fax: (814) 943-6002

Damage Assessed By: TOM SANKER 138636

Appraised For: PENN NATIONAL INSURANCE

Condition Code: Good Type of Loss: Collision
Contact Date: 6/27/2007 Accident Date: 6/3/2007
Deductible: 1,000.00
File Number: S07A48174
Policy No: AU90070779 Claim Number: 04372434

Insured: KENNETH SCHAFER EXCAVATION
Owner: KENNETH SCHAFER
Address: 104 MAHONING STREET, DUBOIS, PA 15801
Telephone: Home Phone: (814) 371-6355

Mitchell Service: 910158

Description: 2004 Ford New Pickup F150 XL Vehicle Production Date: 3/04
Body Style: 4D Pkup/XCb 7' Bed 145" WB Drive Train: 4.6L Inj 8 Cyl 4WD
VIN: 1FTRX14WX4NB73525 License: YTB0488 PA
Mileage: 37,466 OEM/ALT: A Search Code: B16602
Color: BLUE Options: 4WD OR AWD, ANTI-LOCK BRAKE SYS. (ABS), AIR CONDITIONING, POWER STEERING
POWER BRAKES, TILT STEERING WHEEL, AM-FM STEREO, AUTOMATIC TRANSMISSION
STEP BUMPER, TRAILER TOWING PKG., FOG LIGHTS, PASSENGER-FRONT AIR BAG
4 WHEEL DISC BRAKES, DRIVER-FRONT AIR BAG

"THIS IS NOT AN AUTHORIZATION FOR REPAIR"

"If this appraisal uses aftermarket parts, they will be stated on the face of the appraisal (AM). If an aftermarket part was used, and if it voids the existing manufacturers warranty on the part being replaced, the aftermarket part will have a warranty equal or better than the remainder of the existing warranty for the part that was replaced."

"An aftermarket part is defined as a non-original equipment manufacturer (NON-OEM) replacement part, either new or used, for any of the non-mechanical parts that generally constitute the exterior of the motor vehicle, including inner & outer panels."

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
1	AUTO	BDY	OVERHAUL	FRT BUMPER ASSY			3.2 #

ESTIMATE RECALL NUMBER: 07/03/2007 10:18:44 S07A48174

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UltraMate Version: 6.0.025

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Date: 7/3/2007 10:19 AM
 Estimate ID: S07A48174
 Estimate Version: 0
 Preliminary
 Profile ID: CUSTOMIZED

2	002553	BDY	REMOVE/REPLACE	FRT ADD W/FOG LAMPS		0.3	
3	000002	BDY	REMOVE/REPLACE	FRT BUMPER FACE BAR	** QUAL REPL PART	358.00 * INC	
4	000008	BDY	REMOVE/REPLACE	FRT BUMPER SPOILER	** QUAL REPL PART	34.00 * INC	
5	000011	BDY	REMOVE/REPLACE	FRT BUMPER GRILLE	5L3Z 17B968 AA	73.02 INC	
6	000012	BDY	REMOVE/REPLACE	R FRT LWR BUMPER BRACKET	** QUAL REPL PART	26.00 * 0.2 #	
7	000013	BDY	REMOVE/REPLACE	L FRT LWR BUMPER BRACKET	** QUAL REPL PART	26.00 * 0.2 #	
8	000015	BDY	REMOVE/REPLACE	FRT UPR BUMPER COVER	4L3Z 17D957 CA	270.50 INC #	
9	AUTO	REF	REFINISH	FRT UPR BUMPER COVER		C 2.2	
10	000016	BDY	REMOVE/REPLACE	R FRT INR BUMPER BRACKET	** QUAL REPL PART	26.00 * INC	
11	000017	BDY	REMOVE/REPLACE	L FRT INR BUMPER BRACKET	** QUAL REPL PART	26.00 * INC	
12	000018	BDY	REMOVE/REPLACE	R FRT BUMPER PLATE	** QUAL REPL PART	38.00 * INC	
13	000019	BDY	REMOVE/REPLACE	L FRT BUMPER PLATE	** QUAL REPL PART	38.00 * INC	
14	000020	BDY	REMOVE/REPLACE	R FRT OTR BUMPER BRACKET	** QUAL REPL PART	10.00 * INC	
15	000021	BDY	REMOVE/REPLACE	L FRT OTR BUMPER BRACKET	** QUAL REPL PART	10.00 * INC	
16	000022	BDY	REMOVE/REPLACE	GRILLE	4L3Z 8200 AA	258.85 INC #	
17	000042	BDY	REMOVE/REPLACE	R FRONT COMBINATION LAMP ASSEMBLY	7L3Z 13008 FA	236.00 INC	
18	AUTO	BDY	CHECK/ADJUST	HEADLAMPS		0.4	
19	000043	BDY	REMOVE/REPLACE	L FRONT COMBINATION LAMP ASSEMBLY	7L3Z 13008 GA	236.00 INC	
20	000061	BDY	REMOVE/REPLACE	R FOG LAMP	4L3Z 15200 AB	58.95 INC #	
21	000062	BDY	REMOVE/REPLACE	L FOG LAMP	4L3Z 15200 BB	58.95 INC #	
22	000065	BDY	REMOVE/REPLACE	HOOD PANEL	4L3Z 16612 AA	674.25 1.1	
23	AUTO	REF	REFINISH	HOOD OUTSIDE		C 3.0	
24	AUTO	REF	REFINISH	HOOD UNDERSIDE		C 1.5	
25	000067	BDY	REMOVE/REPLACE	HOOD STRIKER	1L2Z 16K689 BA	20.18 INC	
26	000068	BDY	REMOVE/REPLACE	R HOOD HINGE	6L3Z 16796 AA	22.52 0.3 #	
27	AUTO	REF	REFINISH	R HINGE		C 0.5	
28	000069	BDY	REMOVE/REPLACE	L HOOD HINGE	6L3Z 16797 AA	19.53 0.3 #	
29	AUTO	REF	REFINISH	L HINGE		C 0.5	
30	000073	BDY	REMOVE/REPLACE	HOOD LATCH	4L3Z 16700 AB	47.55 INC	
31	000082	BDY	REMOVE/REPLACE	HOOD DEFLECTOR	4L3Z 16C900 AA	80.00 0.2	
32	002723	MCH	REMOVE/REPLACE	ADD TO R&R MECHANICAL COMPONENTS	-M	1.0 #	
33	002725	MCH	REMOVE/REPLACE	EVACUATE & RECHARGE A/C	-M	1.4	
34	002726	MCH	REMOVE/REPLACE	A/C REFRIGERANT RECOVERY	-M	0.3	
35	000084	BDY	REMOVE/REPLACE	COOLING RADIATOR SUPPORT	5L3Z 16138 BA	320.72 6.5 #	
36	AUTO	REF	REFINISH	RADIATOR SUPPORT		1.5	
37	002917	BDY	REMOVE/REPLACE	COOLING LATCH SUPPORT	5L3Z 16864 AA	15.95 INC #	
38	000085	BDY	REMOVE/REPLACE	UPR COOLING AIR DEFLECTOR	7L3Z 19E525 A	39.68 INC	
39	000089	BDY	REMOVE/REPLACE	L OTR COOLING AIR DEFLECTOR	4L3Z 8311 AA	14.30 INC	
40	004985	BDY	REMOVE/REPLACE	COOLING AIR DEFLECTOR	5L3Z 8327 A	25.30 INC	
41	000092	BDY	REMOVE/REPLACE	COOLING RADIATOR	** QUAL REPL PART	190.95 * INC	
42	000094	BDY	REMOVE/REPLACE	R UPR COOLING RAD MTG BRACKET	4L3Z 8A193 AA	5.03	
43	000095	BDY	REMOVE/REPLACE	L UPR COOLING RAD MTG BRACKET	4L3Z 8A193 AA	5.03	
44	000102	BDY	REMOVE/REPLACE	L COOLING OVERFLOW TANK	5L3Z 8A080 AA	43.48 INC	
45	000105	BDY	REMOVE/REPLACE	COOLING FAN SHROUD	7L3Z 8146 A	55.20 INC #	
46	004141	MCH	REMOVE/REPLACE	TRANS OIL COOLER	-M	6L3Z 7A095 A	117.98 INC
47	000126	MCH	REMOVE/REPLACE	AIR COND CONDENSER	-M	** QUAL REPL PART	140.00 * INC #
48	000177	BDY	REMOVE/REPLACE	R FENDER PANEL	5L3Z 16005 AA	165.68 1.5 #	
49	AUTO	REF	REFINISH	R FENDER OUTSIDE		C 1.8	
50	AUTO	REF	REFINISH	R FENDER EDGE		C 0.5	
51	000178	BDY	REMOVE/REPLACE	L FENDER PANEL	5L3Z 16006 AA	165.68 1.5 #	
52	AUTO	REF	REFINISH	L FENDER OUTSIDE		C 1.8	
53	AUTO	REF	REFINISH	L FENDER EDGE		C 0.5	
54	000182	BDY	REPAIR	L FENDER INNER PANEL	Existing	2.0*	
55	000187	BDY	REMOVE/REPLACE	R FENDER LINER	** QUAL REPL PART	41.00 * 0.4	
56	000188	BDY	REMOVE/REPLACE	L FENDER LINER	** QUAL REPL PART	41.00 * 0.4	
57	000221	BDY	REMOVE/INSTALL	R FENDER ADHESIVE NAMEPLATE	Existing	0.1	
58				R&R Time Used In R&J Operation			
59	000222	BDY	REMOVE/INSTALL	L FENDER ADHESIVE NAMEPLATE	Existing	0.1	
60				R&R Time Used In R&J Operation			
61	002587	MCH	REMOVE/REPLACE	DISABLE & ENABLE AIR BAG SYSTEM	-M	INC	

ESTIMATE RECALL NUMBER: 07/03/2007 10:18:44 S07A48174

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Date: 7/3/2007 10:19 AM
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 Preliminary
 Profile ID: CUSTOMIZED

62	002588	MCH	REMOVE/REPLACE	AIR BAG SYSTEM DIAGNOSIS	-M			1.5 #
63	000233	MCH	REMOVE/REPLACE	AIR BAG MODULE-DRIVER FRONT	-M	7L3Z 15043B13 CB	683.56	INC
64	004150	MCH	REMOVE/REPLACE	AIR BAG CLOCKSPrING	-M	5L1Z 14A664 A	50.43	1.1
65	000239	MCH	REMOVE/REPLACE	AIR BAG MODULE-PASSENGER FRONT	-M	6L3Z 15044A74 AB	697.23	0.8
66	000242	MCH	REMOVE/REPLACE	FRT AIR BAG IMPACT SENSOR	-M	6L3Z 14B004 AA	41.88	INC
67	000244	MCH	REMOVE/REPLACE	AIR BAG CONTROL MODULE	-M	5L3Z 14B321 AA	215.30	0.5 #
68	004899	FRM	REMOVE/REPLACE	R FRAME REPAIR KIT	-F	6L3Z 5D058 AA	452.67	5.0
69	004900	FRM	REMOVE/REPLACE	L FRAME REPAIR KIT	-F	6L3Z 5D059 A	417.53	5.0
70	003101	BDY	REMOVE/REPLACE	AIR CLEANER ASSEMBLY		5L3Z 9600 A	428.07	0.4
71	000671	GLS	REMOVE/REPLACE	W/SHIELD GLASS		4L3Z 1503100 AA	355.72	2.5 #
72	003647	BDY	REPAIR	R FRT DOOR REPAIR PANEL		Existing		2.0* #
73	AUTO	REF	REFINISH	R FRT DOOR OUTSIDE				C 2.4
74	003648	BDY	REPAIR	L FRT DOOR REPAIR PANEL		Existing		5.0* #
75	AUTO	REF	REFINISH	L FRT DOOR OUTSIDE				C 2.4
76	002707	BDY	REMOVE/INSTALL	R FRT BELT MOULDING				1.0 #
77	002708	BDY	REMOVE/INSTALL	L FRT BELT MOULDING				1.0 #
78	002709	BDY	REMOVE/INSTALL	R FRT DOOR MIRROR				INC #
79	002710	BDY	REMOVE/INSTALL	L FRT DOOR MIRROR				INC #
80	002711	BDY	REMOVE/INSTALL	R FRT DOOR TRIM PANEL				INC
81	002712	BDY	REMOVE/INSTALL	L FRT DOOR TRIM PANEL				INC
82	900500	BDY *	REMOVE/REPLACE	FLEX ADDITIVE		** QUAL REPL PART	10.00 *	0.0*
83	900500	BDY *	ADD'L LABOR OP	MASK JAMS		Existing		0.4*
84	931105	MCH	ALIGN	FOUR WHEEL ALIGNMENT		Sublet	62.95 *	0.0*
85	900500	BDY *	ADD'L LABOR OP	TRANS FLUID		** QUAL REPL PART	25.00 *	0.0*
86	936003		ADD'L COST	COOLANT				12.00 *
87	002897	BDY	REMOVE/INSTALL	R FRT OTR DOOR HANDLE				0.3 #
88	002898	BDY	REMOVE/INSTALL	L FRT OTR DOOR HANDLE				0.3 #
89	936001		ADD'L COST	TOWING				190.00 *
90	936002		ADD'L COST	STORAGE				450.00 *
91	936012		ADD'L COST	HAZARDOUS WASTE DISPOSAL				3.50 *
92	936018		ADD'L COST	R134A FREON & OIL				45.00 *
93	933006	FRM	ADD'L OPR	FRAME/RACK SET UP				2.0*
94	933031	FRM	ADD'L OPR	PULL FOR MASH				4.0*
95	933032	FRM	ADD'L OPR	PULL FOR TWIST				2.0*
96	AUTO	REF	ADD'L OPR	CLEAR COAT				3.9
97	933005	BDY	ADD'L OPR	RESTORE CORROSION PROTECTION				9.00 * 0.4*
98	933008	REF	ADD'L OPR	CHIP RESISTANT MATERIAL APPLICATION				15.00 * 0.8*
99	933017	REF	ADD'L OPR	FINISH SAND & BUFF				1.0*
100	933018	REF	ADD'L OPR	MASK FOR OVERSPRAY				5.00 * 0.2*
101	AUTO		ADD'L COST	PAINT/MATERIALS				350.00 *

* - Judgement Item

- Labor Note Applies

C - Included in Clear Coat Calc

Remarks

AM RADIATOR AND CONDENSER AS PER QUOTE FROM CANFIELD RADIATOR, (800) 234-5520. ALL OTHER AM PARTS AS PER INTERNET QUOTE AND BODY SHOP QUOTE.

ESTIMATE RECALL NUMBER: 07/03/2007 10:18:44 S07A48174

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 UltraMate Version: 6.0.025

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Date: 7/3/2007 10:19 AM
 Estimate ID: S07A48174
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 Preliminary
 Profile ID: CUSTOMIZED

I. Labor Subtotals						II. Part Replacement Summary			Amount	
		Units	Rate	Add'l Labor Amount	Sublet Amount	Totals				
Body	29.5	40.00		9.00	0.00	1,189.00	T			7,412.67
Refinish	24.5	40.00		20.00	0.00	1,000.00	T			444.76
Glass	2.5	40.00		0.00	0.00	100.00	T			
Frame	18.0	44.00		0.00	0.00	792.00	T			
Mechanical	6.6	45.00		0.00	62.95	359.95	T			
						3,440.95				
						206.46				
Labor Summary						3,647.41				
III. Additional Costs						IV. Adjustments			Amount	
Taxable Costs						Amount				
Sales Tax			@	6.000%		860.50				1,000.00-
Non-Taxable Costs						51.63				
						190.00				
Total Additional Costs						1,102.13				
							I.	Total Labor:		3,647.41
							II.	Total Replacement Parts:		7,857.43
							III.	Total Additional Costs:		1,102.13
								Gross Total:		12,606.97
							IV.	Total Adjustments:		1,000.00-
								Net Total:		11,606.97

THIS ESTIMATE HAS BEEN PREPARED BASED ON THE USE OF AFTERMARKET CRASH PARTS SUPPLIED BY A SOURCE OTHER THAN THE MANUFACTURER OF YOUR VEHICLE. THE AFTERMARKET CRASH PARTS USED IN THE PREPARATION OF THIS ESTIMATE ARE WARRANTED BY THE MANUFACTURER OR DISTRIBUTOR OF SUCH PARTS, RATHER THAN THE MANUFACTURER OF YOUR MOTOR VEHICLE.

This is a preliminary estimate.
Additional changes to the estimate may be required for the actual repair.

Point(s) of Impact

12 Front Center (P), 1 Right Front Corner (S), 2 Right Front Side (S), 10 Left Front Side (S), 11 Left Front Corner (S)

Insurance Co: PNI
 Telephone: (814) 768-9492

Inspection Site: BODY SHOP
 DUBOIS, PA
 Inspection Date: 6/29/2007

Body Shop: MURRAY FORD INC.
 Address: 120 MURTLAND AVE
 DUBOIS, PA 15801
 Work Phone: (814) 371-6600
 Fax Phone: (814) 371-9613
 State Lic. No: 251191385

ESTIMATE RECALL NUMBER: 07/03/2007 10:18:44 S07A48174

Mitchell Data Version: JUN_07_V
 UltraMate Version: 6.0.025

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Page 4 of 5

**"Upon request from the vehicle owner, the insurer will provide information regarding repair facilities, which will be able to repair the vehicle for the appraisal amount. However, the vehicle owner is not required to have the repairs completed at any of these repair facilities."

"Any costs above the appraisal amount as shown on this document may be the sole responsibility of the vehicle owner."

"This appraisal does not limit the owner to use any specified repair shop. The repair shop may be selected by, and is at the discretion of, the vehicle owner."

"Any incidental charges, which were known at the time of this appraisal (such as TOWING, STORAGE, DEPRECIATION, ETC.) are contained herein."

"ANY PERSON WHO KNOWINGLY WITH THE INTENT TO INJURE OR DEFRAUD ANY INSURER FILES AN APPLICATION OR CLAIM CONTAINING ANY FALSE, INCOMPLETE OR MISLEADING INFORMATION SHALL, UPON CONVICTION, BE SUBJECT TO IMPRISONMENT FOR UP TO 7 YEARS AND PAYMENT OF A FINE OF UP TO \$15,000.00."

THE FOLLOWING IS A LIST OF ABBREVIATIONS

D=Discounted part, A=Approximate price, B=Body labor, D=Diagnostic, E=Electrical, F=Frame, G=Glass, M=Mechanical, P=Paint labor, S=Structural, T=Taxed miscellaneous, X=Non Taxed miscellaneous, ADJ=Adjacent, ALIGN=Align, A/M=Aftermarket, BLND=Blend, CAPA=Certified Auto Parts Association, D&R=Disconnect and Reconnect, EST=Estimate, PRICE=Unit price multiplied by the quantity, INCL=Included, MISC=Miscellaneous, NON-ADJ=Non adjacent, O/H=Overhaul, OP=Operation, NO.=Line number, QTY.=Quantity, QUAL, RECY.=Quality recycled part, QUAL. REPL.=Quality Replacement Part, RECOND=Recondition, REFN=Refinish, REPL=Replace, R & I=Remove and install, R&R=Remove and replace, RPR=Repair, RT=Right, SECT=Section, SUBL=Sublet, LT=Left, W/O=Without, W/_=WITH/_#, #=Manual line entry, *=Other (i.e. motors database information was changed), **=Database line with aftermarket, N=Notes attached to line.

COPY

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAVER, LLP
305 North Front Street
P. O. Box 999
Harrisburg, PA 17108
(717) 255-7639
e-mail: cadamson@tthlaw.com

Attorneys for Plaintiff

KENNETH SCHAFER, individually
and d/b/a **KEN SCHAFER EXCAVATION**
Plaintiff

VS.

LEIGHANN KNAPPENBERGER
Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO.: 08-175-CD

CIVIL ACTION – LAW

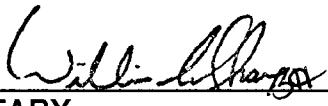
ARBITRATION

RULE 236 NOTICE

TO: LEIGHANN KNAPPENBERGER:

**NOTICE IS GIVEN THAT A JUDGMENT IN THE AMOUNT OF \$13,527.60
HAS BEEN ENTERED AGAINST YOU IN THE ABOVE-CAPTIONED MATTER.**

DATE: 8/28/08


PROTHONOTARY

IF YOU HAVE ANY QUESTIONS CONCERNING THE ABOVE, PLEASE CONTACT:

**Corey J. Adamson, Esquire
I.D. No. 204508
Thomas, Thomas and Hafer, LLP
305 N Front Street
PO Box 999
Harrisburg, PA 17108
(717) 255-7639
Attorneys for Plaintiff**

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

COPY

Kenneth Schaffer
Ken Schaffer Excavation
Plaintiff(s)

No.: 2008-00175-CD

Real Debt: \$13,527.60

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Leighann Knappenberger
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: August 28, 2008

Expires: August 28, 2013

Certified from the record this 28th day of August, 2008.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

FILED Atty Adamson
M12:3A11 pd \$3.00
OCT 06 2008 Certification to Comm of PA
S William A. Shaw
Prothonotary/Clerk of Courts
60

DL-201 (5-02)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

TO THE SECRETARY OF TRANSPORTATION

This is to certify that on August 28, 2008 a judgment

for \$ 13527.60 plus \$ (COST) was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME			SEX	DATE OF BIRTH		
FIRST Leighann	MIDDLE	LAST Knappenberger	F	MONTH 8	DAY 28	YEAR 84
ADDRESS: P.O. Box number may be used in addition to the actual address, but cannot be used as the only address.						
CITY	STATE	ZIP CODE	SOCIAL SECURITY NUMBER			
DRIVER NUMBER	STATE	DATE OF ACCIDENT		CLAIM NUMBER		
27301556	PA	06/03/2007		04372434		

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Kenneth Schaffer Excavation

(NAME)

1373 South 8th Street

(STREET ADDRESS)

DuBois, PA 15801

(CITY & STATE)

(ZIP)

(TELEPHONE NUMBER)

REPRESENTATIVE FOR THE JUDGMENT

CREDITOR (If applicable)

Corey J. Adamson, Esquire

(NAME)

305 North Front Street P.O. Box 999

(STREET ADDRESS)

Harrisburg

PA

17108

(CITY & STATE)

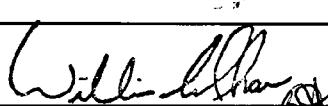
(ZIP)

(717) 255-7639

(TELEPHONE NUMBER)

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

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of October 6, 2008


(SIGNATURE OF CLERK OR JUDGE OF THE
WILIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA
TYPE OR PRINT NAME)

SEAL

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

FILED

02:32 P.M. 08
OCT 16 2017

601
orig. to Comm. of PA
ICC Atty. Mamounas

S BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURT Atty. pd. 3.00

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

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

TO THE SECRETARY OF TRANSPORTATION

08/28/08

This is to certify that on **08/28/08** a judgment

for \$ **13,527.60** plus \$ **(COST)** was entered against the following:

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME	SEX	DATE OF BIRTH			
FIRST	MIDDLE	LAST	MONTH	DAY	YEAR
Leighann	F	Knappenberger			

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

52 Harper Road, P.O. Box 333

CITY	STATE	ZIP CODE	SOCIAL SECURITY NUMBER
Cadogan	PA		
27301556	PA	07/19/2007	04372434

Check this block if defendant is a resident of another state

JUDGMENT CREDITOR

Penn National Insurance

(NAME)

P.O. Box 3380

(STREET ADDRESS)

Harrisburg

PA

17105

(CITY & STATE)

(ZIP)

717-234-4941

(TELEPHONE NUMBER)

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

Paraskevoula V. Mamounas, Esquire

(NAME)

Thomas, Thomas & Hafer, LLP, 1550 Pond Road, Suite 210

(STREET ADDRESS)

Allentown

PA

18104

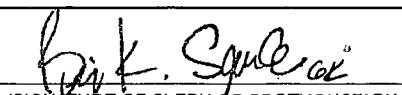
(CITY & STATE)

610-332-7029

(TELEPHONE NUMBER)

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

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal
of the court this Day of October 16 2017


(SIGNATURE OF CLERK OR PROTHONOTARY
OF THE COUNTY COURT)


(TYPE OR PRINT NAME)

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