

08-175-CD

Kenneth Shaffer vs L. Knappenberger

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CIVIL ACTION – LAW

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 :

No. 08-175-CD

Type of Case: **Arbitration**

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. 95.00

MJ:4468
FEB 01 2008

William A. Shaw
Prothonotary/Clerk of Courts
CC Sheriff

Date: January 30, 2008

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

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.

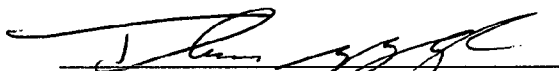
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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. Meholick, Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830

Respectfully submitted,
THOMAS, THOMAS & HAFFER, 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
Attorney I.D. No. 89037
THOMAS, THOMAS & HAFER, 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 & HAFFER, 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

Kenneth B. Schaffer

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAFFER, 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

PRAECIPE 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 & HAFFER, LLP

Date: 4-7-08

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
m/3:30pm Adamson.
APR 9 2008
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

4-7-08

Date

Sherry Hauenstein
Sherry Hauenstein

581847.1

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 & HAFFER, 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 12:44 PM
APR 14 2008 

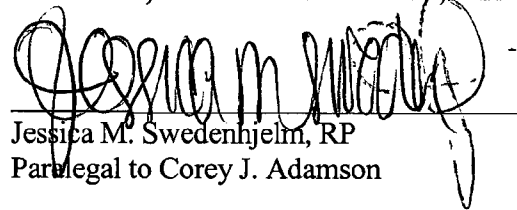
William A. Shaw
Prothonotary/Clerk of Courts

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 & HAFFER, 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 & HAFER, 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

SUPREME COURT ID No: 204508

Deputy

ATTORNEY FOR: Plaintiff

DATE:

Seal of the Court

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

FILED

MAY 05 2008

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 & HAFFER, 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

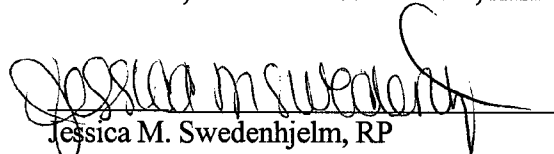
Date: 5/1/08

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 & HAFFER, 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.

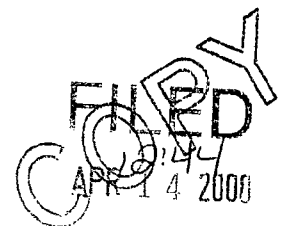
You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made, the subpoenas may be served.

THOMAS, THOMAS & HAFFER, 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: 



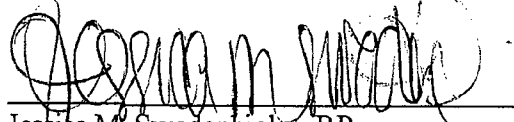
William A. Shaw
Prothonotary/Clerk of Courts

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 & HAFFER, 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 & HAFFER, 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 21 54 30
MAY 21 2008
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 SCHAFER, individually and d/b/a KEN SCHAFER 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

_____ Day of _____ 2008

So Answers,


by *Maelynn Harris*

Chester A. Hawkins
Sheriff

SHERIFF'S RETURN - REGULAR

CASE NO: 2008-00175 T

COMMONWEALTH OF PENNSYLVANIA:
COUNTY OF Armstrong County

KENNETH SCHAFER

VS

LEIGHANN KNAPPENBERGER

RONALD J POLLOCK, 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

41.00 02/25/2008

THOMAS THOMAS & HAFFER LLP

By

Sworn and subscribed to before me

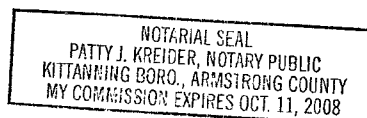
this 28th day of February, 2008 A.D.

Patty J. Kreider
Notary

So answers:

Larry Crawford
Larry Crawford, Sheriff

Ronald J. Pollock
Deputy Sheriff



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 POLLOCK SERVED THE WITHIN ARBITRATION
COMPLAINT UPON THE DEFENDANT, LEIGHANN KNAPPENBERGER, BY PERSONALLY
HANDING TO IRENE CYPHER, 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 deputize the SHERIFF OF ARMSTRONG COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, February 22, 2008.

RESPECTFULLY,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

Corey J. Adamson, Esquire
Attorney I.D. No. 204508
THOMAS, THOMAS & HAFFER, 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. #200*
m/12/03/08
AUG 28 2008 *Notice to Def.*

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

GD

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.

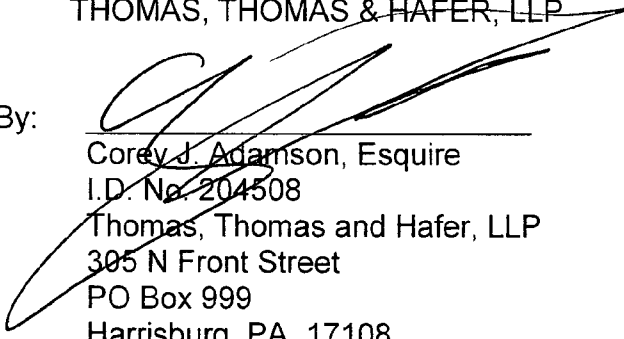
Respectfully submitted,

THOMAS, THOMAS & HAFFER, 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 26th 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 & HAFFER, 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

AFFIDAVIT OF NON-MILITARY SERVICE

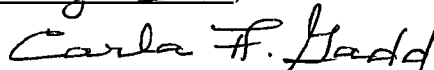
I, Corey J. Adamson, Esquire, being duly sworn according to law, deposes and says that Defendant Leighann Knappenberger, to the best of my knowledge, is not in the military service and is not otherwise subject to the provisions of the Soldiers' and Sailors' Civil Relief Acts.


Corey J. Adamson, Esquire

Dated:

Sworn to Before me this 26th

day of August, 2008.



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 & HAFFER, 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
--	---

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

Respectfully submitted,

THOMAS, THOMAS & HAFFER, LLP



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

Date: May 27, 2008

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
DUBOIS, PA 15801

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature] ☐ Agent ☒ Addressee

B. Received by (Printed Name)

K. KNAPPENBERGER 6/7/08

C. Date of Delivery

D. Is delivery address different from item 1? ☒ Yes

If YES, enter delivery address below: ☐ No

135 BEALE AVE
LEECHBURG PA 15656

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 0220 0001 4374 3639 117

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

Schaffer v

Knappenberger

348 - 718 24



CERTIFICATE OF READINESS

DAUPHIN COUNTY
TWELFTH JUDICIAL DISTRICT
COURT OF COMMON PLEAS

Effective: Rev. (G), July 2007

INSTRUCTIONS: This form shall be used for the assignment of **Pretrial Motions** (Preliminary Objections, Motions for Judgment on the Pleadings, Motions for Summary Judgment, Divorce Special Relief and Contested Civil Motions) and the listing of a case for **Arbitration, Non-jury Trial or Jury Trial**. File the original and one copy of this form with the Prothonotary's Office. This Certificate of Readiness must be **personally signed** by the filing counsel of record or the filing pro se party. (Use reverse side if necessary. **DO NOT ABBREVIATE PARTIES.**)

PLAINTIFF(S): Alice K. Angino and Angino & Rovner, P.C.

DEFENDANT(S): Ciesco, Inc.; United Water Pennsylvania, Inc.; and Norman K. Hoffer and Matthew D. Hoffer d/b/a 4507 Associates

ADDITIONAL DEFENDANT(S):

DOCKET NUMBER: 2006-CV-943

A. PRETRIAL MOTIONS (Complete Sections A and G of the Certificate of Readiness)

☐ Preliminary Objections ☐ Judgment on the Pleadings ☒ Summary Judgment ☐ Divorce Special Relief ☐ Contested Civil Motions

☒ I hereby certify that the matter is ready for disposition in accordance with the Pennsylvania Rules of Civil Procedure and the Dauphin County Local Rules.

B. ARBITRATION (Complete Sections B, E, F and G of the Certificate of Readiness)

☐ I hereby certify that the amount in controversy is \$50,000 or less, and that this case is ready in all respects for disposition by a Board of Arbitration. This matter will be heard by a Board of Arbitration at the time, date, and place specified by the Chair of the panel, but, if one or more of the parties is not present at the hearing, the matter may be heard at the same time and date before a Judge of the Court without the absent party or parties being present. I also realize that there is no right to a trial *de novo* on appeal from a decision entered by a Judge.

C. NON-JURY CIVIL TRIAL (Complete Sections C, E, F and G of the Certificate of Readiness)

☐ I hereby certify that all discovery in the case has been completed and that the case is ready in all respects to be assigned to a judge for a non-jury civil trial in accordance with the Pennsylvania Rules of Civil Procedure and the Dauphin County Local Rules.

D. CIVIL JURY TRIAL (Complete Sections D, E, F and G of the Certificate of Readiness)

☐ I hereby certify that all discovery in the case has been completed; that I have made reasonable inquiry of all counsel and/or pro se parties to ensure that all necessary parties, attorneys, and witnesses will be available and that they are available; that serious settlement negotiations have been conducted; and that the case is ready in all respects for trial, all in accordance with the Pennsylvania Rules of Civil Procedure and the Dauphin County Local Rules. I understand that this case will be listed for a jury trial for the next trial term in accordance with the timelines found in the annual court calendar. I further understand that sanctions may be imposed upon me by the Court for the filing of an improper Certificate of Readiness listing a case for jury trial.

Has this case previously been certified for trial? ☐ Yes, date previously certified:

☐ No, never previously certified

E. TYPE OF CASE AND ESTIMATED TRIAL LENGTH

☐ Contract ☐ Medical Malpractice ☐ Motor Vehicle Accident ☐ Products Liability ☐ Premises Liability ☐ Other Malpractice

☐ Other Type of Case: Estimated Trial Time: days

F. MEDIATION

☐ Pursuant to Dauphin County Local Rule 1001, I hereby certify that mediation has been previously pursued or that the topic of mediation was discussed by not only counsel with their clients but also by all counsel and/or pro se parties and rejected only after good faith consideration.

G. COUNSEL: (List names, addresses and telephone numbers of all counsel and check appropriate box to designate listing counsel)
SEE ADDENDUM FOR OTHER DEFENDANTS' COUNSEL

Plaintiff(s): Daryl Christopher, Esq.
Angino & Rovner, P.C.
4503 N. Front St.
Harrisburg, PA 17110

Telephone Number: 238-6791

Email Address: dchristopher@angino-rovner.com

☐ Listing Counsel

Defendant(s): Brooks R. Foland, Esq.
Thomas, Thomas & Hafer, LLP
POB 999
Harrisburg, PA 17108-0999

Telephone Number: 255-7626

Email Address: bfoland@tthlaw.com

SEE ADDENDUM FOR OTHER DEFENDANTS' COUNSEL

☒ Listing Counsel

VERIFICATION: I, the undersigned listing counsel or pro se party, hereby acknowledge that sanctions may be imposed upon me for the improper filing of this Certificate of Readiness and that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities. I further certify that I will immediately serve all counsel and/or pro se parties with a copy of this Certificate of Readiness.

Date

Signature of Listing Counsel or Pro Se Party (Read Verification First)

Payments and Recoveries for Claim 04372434
As of

Adjuster: Toni Williams

Loss Type: Collision

Coverage: AUTO PHYSICAL DAMAGE COLL

Claimant Name: KENNETH SCHAFER EXCAVATION

Monetary Types: Loss Payment~Supplemental Payment

From: To:

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 SCHAFER EXCAVA	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							



PENNA NATIONAL
INSURANCE

AUTO/HEAVY EQUIPMENT APPRAISAL COVER SHEET

DATE: 7/3/07

CLAIM NUMBER: 04372434

APPRAISER: Tom Sanker

VEHICLE OWNER: Ken Schaffer Exc.

CLAIM REP: Toni Williams

REPAIRABLE

TOTAL LOSS

GROSS APPRAISAL 12606.97

NET ACV _____

LESS DEDUCTIONS: - _____

DEDUCTIONS: - _____

- _____

TAX: + _____

DEDUCTIBLE: - 1000.00

DEDUCTIBLE: - _____

TOTAL: 11606.97

TOTAL: _____

DRIVABLE: YES ☐ NO ☒

SALVAGE MOVED: YES ☐ NO ☐

AGREED PRICE: YES ☒ NO ☐

SALVAGE POOL:

DAYS TO REPAIR: 15

STOCK# _____

SALVAGE VALUE: _____

Pittsburgh CSO

Salvage Direct
814-827-0300

COMMENTS:

CLOSING REPORT ☒

STATUS REPORT ☐

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
Contact Date: 6/27/2007
Deductible: 1,000.00
File Number: S07A48174
Policy No: AU90070779

Type of Loss: Collision
Accident Date: 6/ 3/2007

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
Body Style: 4D PkUpXCb 7' Bed 145" WB
VIN: 1FTRX14WX4NB73525
Mileage: 37,466
OEM/ALT: A
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

Vehicle Production Date: 3/04
Drive Train: 4.6L Inj 8 Cyl 4WD
License: YTB0488 PA
Search Code: B16602

"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

Mitchell Data Version: JUN_07_V
UltraMate Version: 6.0.025

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Page 1 of 5

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

I. Labor Subtotals	Units	Rate	Add'l Labor Amount	Sublet Amount	Totals	II. Part Replacement Summary	Amount
Body	29.5	40.00	9.00	0.00	1,189.00 T	Taxable Parts	7,412.67
Refinish	24.5	40.00	20.00	0.00	1,000.00 T	Sales Tax @ 6.000%	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	Total Replacement Parts Amount	7,857.43
Mechanical	6.6	45.00	0.00	62.95	359.95 T		
Taxable Labor					3,440.95		
Labor Tax @ 6.000 %					206.46		
Labor Summary	81.1				3,647.41		
III. Additional Costs					Amount	IV. Adjustments	Amount
Taxable Costs					860.50	Insurance Deductible	1,000.00-
Sales Tax			@ 6.000%		51.63	Customer Responsibility	1,000.00-
Non-Taxable Costs					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 MURLAND 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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*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=Fram, G=Glass, M=Mechanical, P=Paint labor, S=Structural, T-Taxed miscellaneous, X=Non Taxed miscellaneous, ADJ=Adjacent, ALGN=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 & HAFFER, 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

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

COPY

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

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

02:32 P.M. OK
OCT 16 2017S
BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURT
Att'y Pd. 3.00orig. to Comm. of PA
ICC Att'y. Mamounas

COPY

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

COURT INFORMATION	
COURT	Common Pleas
COUNTY	Clearfield
NUMBER	08-175-CD
YEAR	2008

TO THE SECRETARY OF TRANSPORTATION

This is to certify that on **08/28/08** a judgmentfor \$ **13,527.60** plus \$ _____ was entered against the following:
(AMOUNT) (COST)

(Please use a separate form for each)

JUDGMENT DEBTOR

(Please Print or Type)

NAME			SEX	DATE OF BIRTH		
FIRST	MIDDLE	LAST	F	MONTH	DAY	YEAR
Leighann		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				
DRIVER NUMBER		STATE	DATE OF ACCIDENT	CLAIM NUMBER		
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)

Paraskevoulia V. Mamounas, Esquire

(NAME)

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

(STREET ADDRESS)

Allentown PA 18104

(CITY & STATE)

(ZIP)

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)

SEAL

 Brian K. Spencer
 (TYPE OR PRINT NAME)

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