

08-934-CD
21st Century Ins. Vs Ravi Harlalka

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE) CIVIL DIVISION
Plaintiff,) 2008-934-CD
v.)
RAVI HARLALKA,)
Defendant.)

JOINT PETITION TO COMPROMISE A
MINOR'S CLAIM

Counsel for 21st Century Insurance:

Adam G. Anderson, Esquire
PA ID # 93538
Grant H. Hackley, Esquire
PA ID #206141

MARKS, O'NEILL, O'BRIEN &
COURTNEY, P.C.
Firm #263

2600 Gulf Tower
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Pittsburgh, PA 15219
(412) 391-6171

FILED *ATTY PAID 95.00*
in 2:22pm GK 1cc AT&T
MAY 19 2008 *TEC SHERIFF*

William A. Shaw
Prothonotary/Clerk of Courts

60

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE) CIVIL DIVISION
Plaintiff,)
v.)
RAVI HARLALKA,)
Defendant.)

JOINT PETITION TO COMPROMISE A MINOR'S CLAIM

TO THE HONORABLE JUDGE OF SAID COURT:

RAVI HARLALKA, parent and natural guardian of NANDINI HARLALKA, and
NANDINI HARLALKA, a minor, pro se, and 21ST CENTURY INSURANCE by and through
their undersigned counsel, Marks, O'Neill, O'Brien and Courtney, P.C., Adam G. Anderson,
Esquire, and Grant H. Hackley, Esquire, pursuant to Pennsylvania Rules of Civil Procedure 2039
jointly petition this Honorable Court for leave to compromise the claim of Nandini Harlalka, a
minor, against Defendant, Ravi Harlalka, and assigns therefore the following reasons:

1. Nandini Harlalka is a minor, born July 7, 2006.
2. Nandini Harlalka is in the care of her parent and natural guardian, Ravi Harlalka,
who resides in Canada, 1514-125 Bamburgh Circle, Scarborough, Ontario, MIW3G4.
3. At the time of the incident herein described, Ravi Harlalka had abandoned his
residence in the State of Ohio, and was in transit to a new residence in the State of New Jersey.

4. This action arises out of an automobile accident on September 9, 2007, in which Ravi Harlalka, was driving a motor vehicle in an easterly direction on Interstate 80 in Clearfield County, Pennsylvania.

5. Defendant Ravi Harlalka was traveling at a normal highway rate of speed when the vehicle left the roadway of Interstate 80 and overturned.

6. Minor Nandini Harlalka, date of birth July 7, 2006, was a passenger in the vehicle, and was wearing a restraint device, but suffered a one centimeter laceration to the scalp caused by the accident.

7. Minor Nandini Harlalka was airlifted by helicopter to Altoona General Hospital, where she was treated and found to be in good condition excepting the scalp laceration.

8. Minor Nandini Harlalka incurred numerous medical bills as a result of the accident and the resulting airlift and emergency room visit.

9. These expenses include but are not limited to \$11,032.00 as a result of the airlift, \$38.00 as a result of emergency room x-ray services, and \$6,322.20 for various other emergency room services for a total of \$17,392.20.

10. Defendant Ravi Harlalka is insured by 21st Century Insurance, Policy Number 5815463, with a limit of insurance of \$100,000.

11. Defendant Ravi Harlalka and 21st Century Insurance have agreed to a settlement amount of \$25,000 to resolve this matter, pursuant to claim number 731248.

12. Defendant Ravi Harlalka is unrepresented by counsel, but has provided informed consent to the compromise, in the knowledge that Attorneys Anderson and Hackley are acting on behalf of insurer.

13. Medical expenses remain outstanding, and it is the parties' intent that a portion of the settlement amount of \$25,000 be used to defray these costs.

14. Those expenses to be paid from the settlement amount of \$25,000 are:

(a) \$11,032.00 incurred by the airlift;

(b) \$736.20 remaining of the 6,322.20 incurred as a result of the emergency room visit, which may be further defrayed by the primary medical insurer to leave a potential final outstanding balance of \$149.00; and

(c) \$38.00 incurred as a result of x-rays taken and not otherwise billed.

(d) The settlement funds to be used for outstanding medical expenses shall not exceed the total of the preceding amounts, \$11,806.20.

15. As Nandini Harlalka and her natural guardian, Defendant Ravi Harlalka, are not being represented in this matter by Attorneys Anderson and Hackley, no attorney's fees have accrued against the settlement sum.

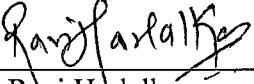
16. The parties believe the above is a fair and reasonable settlement of the matter in light of the medical expenses incurred and the nature of the relationship of the parties and the circumstances of the accident.

17. Pursuant to Pennsylvania Rule of Civil Procedure 2039, attached are exhibits including a statement of counsel that this settlement is desirable, a description of the services rendered, and a statement that because fees were not incurred by Defendant, the fees assessed were reasonable (Exhibit A).

18. Also attached as an exhibit is a statement of the doctor, by way of medical reports, who attended to the minor concerning her injuries and prognosis (Exhibit B).

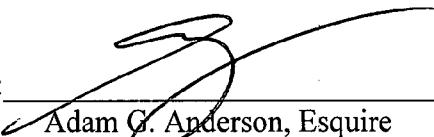
Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY: 

Rayi Harlalka
pro se

1514-125 Bamburgh Circle
Scarborough
Ontario, MIW3G4
Canada

BY: 

Adam G. Anderson, Esquire
PA ID # 93538
Grant H. Hackley, Esquire
PA ID # 206141
Marks, O'Neill, O'Brien & Courtney, P.C.
707 Grant Street
Gulf Tower, Suite 2600
Pittsburgh, PA 15219
Counsel for 21st Century Insurance

PREPARED BY:


Adam G. Anderson, Esquire
PA ID # 93538
Grant H. Hackley, Esquire
PA ID # 206141

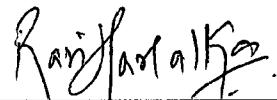
Marks, O'Neill, O'Brien & Courtney, P.C.
707 Grant Street

Gulf Tower, Suite 2600
Pittsburgh, PA 15219

Counsel for 21st Century Insurance

VERIFICATION

I verify under penalty of perjury that the averments of fact made in the foregoing documents are true and correct based upon my personal knowledge, information or belief. I understand that this verification is made subject to the penalties of 18 P.A.C.S. Section 4904 relating to unsworn falsification to authorities.



Ravi Harlalka, parent and natural guardian
of Nandini Harlalka

DATE: 04/24/2008

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

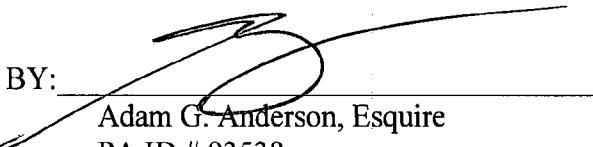
21ST CENTURY INSURANCE)	CIVIL DIVISION
)	
Plaintiff,)	
)	
)	
)	
v.)	
)	
RAVI HARLALKA,)	
)	
Defendant.)	

STATEMENT OF COUNSEL

It is the professional opinion of the undersigned that the above-described agreement is a fair and reasonable settlement of the matter herein described. The attorneys prepared this pleading after communicating with Defendant Ravi Harlalka, and after communication with the insurer and upon review of the medical records and bills relating to this matter. There will be no attorney's fee incurred by Nandini Harlalka, the minor, or her father, Ravi Harlalka, the named Defendant, as the undersigned does not represent them.

Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY: 

Adam G. Anderson, Esquire

PA ID # 93538

Grant H. Hackley, Esquire

PA ID # 206141

Marks, O'Neill, O'Brien & Courtney, P.C.

707 Grant Street

Gulf Tower, Suite 2600

Pittsburgh, PA 15219

Counsel for 21st Century Insurance.

EXHIBIT B



Name: Harlalka, Nandini
Age: 14M **DOB:** 07/07/2006
Gender: F – **Wt:** 13.6 Kg
Medrec: 000000429039
Acct: 000303640114
Attending: DS1
Primary Nurse: LAS
Bed: ED WAITING

ALTOONA REGIONAL DISCHARGE INSTRUCTIONS

Patients and Families

Thank you for choosing Altoona Regional for your emergency care. We hope to provide you excellent care and we apologize for any delay. You may see many members of our team during your visit. We have many nurses, physicians, technicians and secretaries.

Your emotional and spiritual needs are very important to us. We have clergy in house if you need anything. Please just let us know.

If you have pain and it becomes worse, please talk with one of our team members. Our goal is to make you comfortable. Our discharge instructions are tailored and specific to each of your needs.

We are always open for suggestions on how we can provide excellent care to our patients.

If you had XRAYS:

The interpretation of x-rays at the time of the emergency visit may only be a preliminary report. You will be notified if there is a change in the interpretation when the x-rays are reviewed by the radiologist.

If you had CULTURES:

Cultures taken at the time of the emergency visit are not ready until one to several days afterwards. If culture results are positive, you will be notified if change in the treatment is necessary.

FINAL DIAGNOSIS

EVALUATION MVC

ADDITIONAL DIAGNOSIS

CLOSED HEAD INJURY

FOLLOWUP CONTACTS

SPECIAL INSTRUCTIONS

Follow up with primary care physician

Return if worse

Take medication as prescribed

MEDICAL INSTRUCTIONS

MINOR HEAD INJURY

You have been diagnosed with a minor head injury.

A minor head injury means that although you DID have trauma to your head, you did not seem to have had a serious injury to your brain. You DID NOT suffer a concussion. A concussion is a slightly more severe form of head injury in which the victim may have lost consciousness for a period of time and demonstrates some evidence of brain injury.

In the absence of serious trauma and either no loss of consciousness or a very brief loss of consciousness, X-Rays and CT scans are usually unnecessary.

Treatment includes mild pain medications and observation at home. Narcotic or strong pain medications are



Name: Harlalka, Nandini
Age: 14M DOB: 07/07/2006
Gender: F – Wt: 13.6 Kg
Medrec: 000000429039
Acct: 000303640114
Attending: DS1
Primary Nurse: LAS
Bed: ED WAITING

ALTOONA REGIONAL DISCHARGE INSTRUCTIONS

usually not necessary. In most cases, acetaminophen (Tylenol) or ibuprofen (Advil or Motrin) should manage your pain adequately.

After a minor head injury, mild headache may last for days.

Over the next 24 hours:

- Stay with family or friends that can observe your behavior.
- Avoid alcohol or drugs.

YOU SHOULD SEEK MEDICAL ATTENTION IMMEDIATELY, EITHER HERE OR AT THE NEAREST EMERGENCY DEPARTMENT, IF ANY OF THE FOLLOWING OCCURS:

- Worsening severe headache.
- Numbness, tingling, or weakness in your arms or legs.
- Fever, neck pain, change of behavior.
- Vomiting, difficulty walking or changes in vision.
- Difficulty waking from sleep with increased confusion.

SEATBELTS: There is no doubt that seatbelts save lives. Every day in the Emergency Department we see people driving without seatbelts are more severely hurt. We always buckle up. Please do the same!

HARLAKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg
N%STARTERPHYSBQJ IBEX MD REQUESTED M 000303640114

070909155023

88

DISPOSITION
PATIENT 9/9/2007 17:01 Stern Doug .
Condition: MSE completed no longer has EMC, Stable.
PATIENT 9/9/2007 19:44 Stern Doug
Disposition: A. Home.

DISPOSITION
PATIENT 9/9/2007 20:25 Stoy Lori
TRANSFER IN: NO. Hold Patient: No. Campus: AH. Remove from ER.

ORDERS

Nursing Assessment by RAA Sun Sep 09 2007 15:50 Active
SINGLE VIEW CHEST by RAA Sun Sep 09 2007 16:15 Done Sun Sep 09 2007
2:11
PELVIS XRAY by RAA Sun Sep 09 2007 16:15 Active
-3 Lead EKG by LAS Sun Sep 09 2007 20:25 Sent
Hypothermia Precautions by LAS Sun Sep 09 2007 20:25 Sent

7

DIAGNOSIS
FINAL 9/9/2007 17:01 Stern Doug
PRIMARY: EVALUATION MVC. ADDITIONAL: CLOSED HEAD INJURY.

IMAGING
FLOW SHEET 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
RESPONSE 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
DEMO 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
CONSENT 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Image captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 002 addedImage captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 004 addedImage captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 003 addedImage captured from scanner.
H AND P 9/9/2007 23:30 Noye Joyce
Image captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 004 addedImage captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 003 addedImage captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 002 addedImage captured from scanner.

IMAGING
MEDICAL COMMAND 9/9/2007 16:57 McCartney Teresa
Image captured from scanner.

TRIAGE
PATIENT 9/9/2007 15:50 Adams Rhonda
NAME: Wheat Trauma. AGE: 6. GENDER: male. DOB: Thu Sep 09 1999.

HARLALKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg
METANQS: UNKNOWN. Current vaccinations: Unknown. Ambulance patients:
G/A. SSN: 999999999. ZIP CODE: 16601. KG WEIGHT: 13.6. BROSLOW COLOR
CODE: Yellow. PHONE: 814999-9999. MEDICAL RECORD NUMBER: 000000429039.
ACCOUNT NUMBER: 000303640114. ADMITTING: Trauma.
GREET TIME 9/9/2007 15:50 Adams Rhonda
STR1 1.
PAIN 9/9/2007 15:50 Adams Rhonda
Triage assessment performed. ~~gender~~.
ADMISSION 9/9/2007 15:50 Adams Rhonda
URGENCY: 1 RESUS. ADMISSION SOURCE: Other. TRANSPORT: STAT. DEPT:
Emergency. BED: WAITING.
COMPLAINT 9/9/2007 15:50 Adams Rhonda
COMPLAINT: TRAUMA ALERT MVC.
TRIAGE TIME 9/9/2007 15:50 Adams Rhonda
STR1 1.

8

9 TRAUMA PROTOCOL
TIME OUT 9/9/2007 17:07 Stern Doug
Patient identification confirmed.
Verbal consent obtained. Performed by attending. Mechanism of
injury: MVC. Patient status: Alert. Report from EMS AIR. Dentition
not prohibitive. Oropharyngeal classification for airway exam Class
1: Able to visualize soft palate, fauces, uvula, tonsillar pillars.
Normal healthy patient.

10

11 ROS
12 ALL SYSTEMS NEGATIVE 9/9/2007 17:05 Stern Doug
All systems were reviewed and are negative except as described above.

PAST MEDICAL HISTORY

FAMILY HISTORY 9/9/2007 17:05 Stern Doug
Family history is not contributory to this case.
PEDIATRIC HISTORY 9/9/2007 17:05 Stern Doug
Immunizations, up to date. No recent illness. No history of maternal
infection. Feeding normally. Full term.
PED FEMALE SURGICAL HISTORY 9/9/2007 17:05 Stern Doug
Patient has had no previous surgical history.
PED SOCIAL HISTORY 9/9/2007 17:05 Stern Doug
No ill contacts. No recent travel.
NOTES 9/9/2007 17:05 Stern Doug
Nursing records reviewed. Agree with nursing records. Medication
list reviewed.

PHYSICAL EXAM

SKIN 9/9/2007 17:06 Stern Doug
Skin is warm. Skin is dry. Skin is normal color. female.
RESPIRATORY CHEST PED 9/9/2007 17:06 Stern Doug
Breath sounds clear and equal bilaterally. No respiratory distress.
No accessory muscle use. No retractions.
UPPER EXTREMITY 9/9/2007 17:06 Stern Doug
Inspection normal. No cyanosis. No clubbing. No edema. Normal
range of motion.
EYES 9/9/2007 17:06 Stern Doug
Eyes are normal to inspection. Pupils equal, round and reactive to
light. No discharge from eyes. Extraocular muscles intact. Sclera
are normal. Conjunctiva are normal.
LYMPHATIC 9/9/2007 17:06 Stern Doug
No adenopathy in neck. No adenopathy in axillae. No adenopathy in
groin.
CONSTITUTIONAL PED 9/9/2007 17:06 Stern Doug
Patient is afebrile. Triage vital signs reviewed. Well appearing.
Alert and oriented appropriate to age. uncomfortable.

HARLAKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg

MNEURO PED 9/9/2007 17:06 Stern Doug
Awake, alert appropriate for age. GCS Modified for age. No focal motor deficits. No focal sensory deficits. No cerebellar deficits. Speech normal. Gait normal. Memory normal.

PSYCHIATRIC 9/9/2007 17:06 Stern Doug
Oriented X 3. Normal affect. Normal insight. Normal concentration.

HEAD PED 9/9/2007 17:06 Stern Doug
Normocephalic. ABRASION TO SCALP.

NECK PED 9/9/2007 17:06 Stern Doug
Trachea midline. No masses. No lymphadenopathy. Supple.

BACK 9/9/2007 17:06 Stern Doug
There is no CVA Tenderness. There is no tenderness to palpation.

Normal inspection.

ENT PED 9/9/2007 17:06 Stern Doug
Ears and nose normal to inspection. Oropharynx normal. Mucous membranes pink and moist. No stridor.

CARDIOVASCULAR PED 9/9/2007 17:06 Stern Doug
RRR. Heart sounds normal. Capillary refill less than 2 seconds.

Pulses 2+, equal bilaterally. No murmurs.

ABDOMEN PED 9/9/2007 17:06 Stern Doug
Abdomen is soft. Abdomen is non-tender. No distension. No masses.

Bowel sounds normal. Liver and spleen normal.

LOWER EXTREMITY 9/9/2007 17:06 Stern Doug
Inspection normal. No cyanosis. No clubbing. No edema. Normal range of motion. No calf tenderness.

..

HPI MVA-MVC
HISTORIAN 9/9/2007 17:04 Stern Doug
History obtained from EMS.

OCCURRED 9/9/2007 17:04 Stern Doug
Onset of symptoms reported as sudden. Just prior to presentation.

LOCATION 9/9/2007 17:04 Stern Doug
Neck pain: None. Back pain: None. Chest pain: None. Abdominal pain: None. Contusion/Abrasion: scalp.

ASSOCIATED WITH 9/9/2007 17:04 Stern Doug
No associated symptoms. Alcohol: Denies.

RISK FACTORS 9/9/2007 17:04 Stern Doug
Spine Injury Risk Factors: None. Intracranial Bleed Risk Factors: None.

CHIEF COMPLAINT 9/9/2007 17:04 Stern Doug
Patient was involved in motor vehicle crash. Patient was driver. Windshield damaged.

INSTRUCTION

INSTRUCTIONS 9/9/2007 19:44 Stern Doug

"title_info">DISCHARGE INSTRUCTIONS RECEIPT

As Always, You are the most important factor in your recovery. Please follow these instructions carefully. If you have problems that we have not discussed, CALL OR VISIT YOUR DOCTOR RIGHT AWAY. If you can't reach your doctor, return to the emergency department.

If your physician has ordered crutches or a walker, this is the therapeutic modality for your care. Please check the below of the choice for this durable medical supply.

____Home Health Resource
____Other by patient

FINAL DIAGNOSIS
EVALUATION MVC

ADDITIONAL DIAGNOSIS
CLOSED HEAD INJURY

FOLLOWUP CONTACTS

THE FOLLOWING SPECIAL INSTRUCTIONS WERE GIVEN
Follow up with primary care physician
Return if worse
Take medication as prescribed

THE FOLLOWING MEDICAL INSTRUCTIONS WERE GIVEN
MINOR HEAD INJURY

Understand the written and discussed instructions. My questions have been answered."

Patient .

HARLALKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg
person

SPECIAL 9/9/2007 19:44 Stern Doug
Follow up with primary care physician
Return if worse
Take medication as prescribed.
DISCHARGE 9/9/2007 19:44 Stern Doug
MINOR HEAD INJURY
VITAL SIGNS 9/9/2007 15:50 Adams Rhonda
ELSE BP.
&END

13:27 01182008

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE

) CIVIL DIVISION

Plaintiff,

)
2008-934-CD

v.

RAVI HARLALKA,

Defendant.

ORDER OF COURT

AND NOW, to wit this 9th day of July, 2008, upon
consideration of the within Petition, it is hereby ADJUDGED, ORDERED AND DECREED that
the settlement offer of \$25,000.00 be approved on behalf of minor, Nandini Harlalka, and,
pursuant to Pennsylvania Rules of Civil Procedure 2039, said sum shall be deposited in the name
of Nandini Harlalka, a minor, into a savings account or a certificate of deposit in a Federally
insured bank, savings and loan association or credit union with certain medical expenses,
enumerated above, to be paid from the settlement funds, limited to the cost of the medical airlift,
the remaining cost of the emergency room visit of September 9, 2007, and the cost of a bill for x-
rays received by Ravi Harlalka dated January 3, 2008, all totaling \$11,806.20. The savings
account or certificate of deposit shall be marked "NOT TO BE WITHDRAWN UNTIL THE
MINOR REACHES THE AGE OF MAJORITY OR BY FURTHER ORDER OF COURT.".

Proof of deposit in a bank or savings and loan shall be promptly filed of record by Adam
G. Anderson, Esquire, counsel for insurer 21st Century Insurance.

J. Adam G. Anderson
ORPHANS' COURT DIVISION

FILED
0 11:37 a.m. 06
JUL 09 2008

William A. Shaw
Prothonotary/Clerk of Courts

3CC ATTY
HACKLEY -
WILL SERVE

GD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE) CIVIL DIVISION

Plaintiff,)

v.)

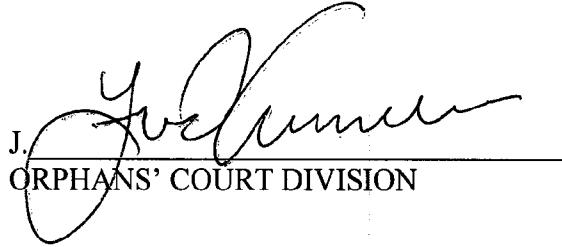
RAVI HARLALKA,)

Defendant.)

08-934-CD

ORDER OF COURT

AND NOW, this 21 day of May, 2008, a hearing found to be necessary, it is hereby ordered that hearing on the above-named parties' Joint Petition to Compromise a Minor's Claim, is scheduled for July 9, 2008 at 11:00 A.M.


J. Vicki Kimerer
ORPHANS' COURT DIVISION

FILED 3cc
MAY 22 2008 Atty Hackley
William A. Shaw
Prothonotary/Clerk of Courts

FILED

MAY 22 2008

**William A. Shaw
Prothonotary/Clerk of Courts**

DATE: 5/22/08

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

~~**FILED**~~

~~**MAY 19 2008**~~

~~William A. Shaw
Prothonotary/Clerk of Courts~~

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

21ST CENTURY INSURANCE) CIVIL DIVISION
Plaintiff,)
v.) 2008-934-CD
RAVI HARLALKA,)
Defendant.)

FILED

OCT 08 2008

W/10:15/ (C)
William A. Shaw
Prothonotary/Clerk of Courts

S no C/C (GK)

JOINT PETITION TO AMEND THE
ORDER OF COURT

Counsel for 21st Century Insurance:

Grant H. Hackley, Esquire
PA ID #206141

Adam G. Anderson, Esquire
PA ID # 93538

MARKS, O'NEILL, O'BRIEN &
COURTNEY, P.C.
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2600 Gulf Tower
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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21ST CENTURY INSURANCE)	CIVIL DIVISION
)	
Plaintiff,)	2008-934-CD
)	
v.)	
)	
RAVI HARLALKA,)	
)	
Defendant.)	

JOINT PETITION TO AMEND THE ORDER APPROVING THE SETTLEMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Ravi Harlalka, parent and natural guardian of Nandini Harlalka, and Nandini Harlalka, a minor, pro se, and 21ST Century Insurance by and through their undersigned counsel, Marks, O'Neill, O'Brien and Courtney, P.C., Adam G. Anderson, Esquire, and Grant H. Hackley, Esquire, jointly petition this Honorable Court for leave to amend the Order of Court approving the settlement of Nandini Harlalka, a minor, and assigns therefore the following reasons:

1. Nandini Harlalka is a minor, born July 7, 2006.
2. Nandini Harlalka is in the care of her parent and natural guardian, Ravi Harlalka, who resides in Canada, 1514-125 Bamburgh Circle, Scarborough, Ontario, MIW3G4.
3. At the time of the incident herein described, Ravi Harlalka had abandoned his residence in the State of Ohio, and was in transit to a new residence in the State of New Jersey.
4. This action arises out of an auto accident on September 9, 2007, in which Mr. Harlalka was driving a motor vehicle eastbound on I-80 in Clearfield County, Pennsylvania.
5. Defendant Ravi Harlalka was traveling at a normal highway rate of speed when the vehicle left the roadway of Interstate 80 and overturned.

6. Minor Nandini Harlalka, date of birth July 7, 2006, was a passenger in the vehicle, and was wearing a restraint device, but suffered a one centimeter laceration to the scalp.

7. Minor Nandini Harlalka was airlifted by helicopter to Altoona General Hospital, where she was treated and found to be in good condition excepting the scalp laceration.

8. Minor Nandini Harlalka incurred numerous medical bills as a result of the accident and the resulting airlift and emergency room visit.

9. Pursuant to Pennsylvania Rule of Civil Procedure 2039, this Honorable Court, upon hearing, approved a settlement agreement between Defendant's insurer and the minor, Nandini, on July 9, 2008. (See attached Exhibit A).

10. The minor's medical bills have been satisfied. Funds remain in the amount of approximately \$13,194 USD which are required to be deposited into a Federally insured account in the minor's name

11. Defendant is not a United States citizen, and at present is unable to enter the United States.

12. Due to various visa requirements, Homeland Security regulations and his inability to enter the United States, Defendant is unable to establish an account for the minor that is guaranteed by the Federal Deposit Insurance Corporation, as required by the current Order.

13. However, Defendant Ravi Harlalka is able to establish an account that is guaranteed by the Canada Deposit Insurance Corporation, an entity whose purpose is identical to the FDIC.

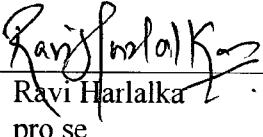
14. In a CDIC account, the funds would accrue interest at a comparable rate to funds in an account at an FDIC-insured bank in the United States, and the funds are capable of being marked for withdrawal by Nandini only, upon reaching the age of 18.

15. Defendant Ravi Harlalka is unable to otherwise establish an account in which to set the funds deemed to be for Nandini aside.

WHEREFORE, 21st Century, by and through their undersigned counsel, and Ravi Harlalka, pro se, request that this Honorable Court amend its Order of Court of July 9, 2008, to enable Defendant to establish a CDIC account into which the funds approved for settlement with Nandini Harlalka may be deposited, and the required proof of deposit may be filed promptly with the Court.

Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY: 

Ravi Harlalka
pro se

1514-125 Bamburgh Circle
Scarborough
Ontario, MIW3G4
Canada

BY: 

Grant H. Hackley, Esquire
PA ID # 206141
Adam G. Anderson, Esquire
PA ID # 93538
Marks, O'Neill, O'Brien & Courtney, P.C.
707 Grant Street
Gulf Tower, Suite 2600
Pittsburgh, PA 15219
Counsel for 21st Century Insurance

PREPARED BY: 

Grant H. Hackley, Esquire
PA ID # 206141
Adam G. Anderson, Esquire
PA ID # 93538

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE) CIVIL DIVISION

Plaintiff,

v.

RAVI HARLALKA,

Defendant.

2008-934-CD

ORDER OF COURT

AND NOW, to wit this 9th day of July, 2008, upon
consideration of the within Petition, it is hereby ADJUDGED, ORDERED AND DECREED that
the settlement offer of \$25,000.00 be approved on behalf of minor, Nandini Harlalka, and,
pursuant to Pennsylvania Rules of Civil Procedure 2039, said sum shall be deposited in the name
of Nandini Harlalka, a minor, into a savings account or a certificate of deposit in a Federally
insured bank, savings and loan association or credit union with certain medical expenses,
enumerated above, to be paid from the settlement funds, limited to the cost of the medical airlift,
the remaining cost of the emergency room visit of September 9, 2007, and the cost of a bill for x-
rays received by Ravi Harlalka dated January 3, 2008, all totaling \$11,806.20. The savings
account or certificate of deposit shall be marked "NOT TO BE WITHDRAWN UNTIL THE
MINOR REACHES THE AGE OF MAJORITY OR BY FURTHER ORDER OF COURT.".

Proof of deposit in a bank or savings and loan shall be promptly filed of record by Adam
G. Anderson, Esquire, counsel for insurer 21st Century Insurance.

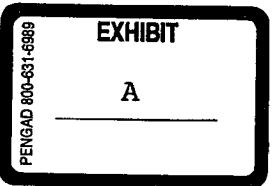
I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

J. Paul Mummey
ORPHANS' COURT DIVISION

Attest.

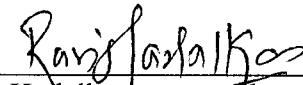
William B. Harlalka
Prothonotary/
Clerk of Courts

JUL 09 2008



VERIFICATION

I verify under penalty of perjury that the averments of fact made in the foregoing documents are true and correct based upon my personal knowledge, information or belief. I understand that this verification is made subject to the penalties of 18 PA.C.S. Section 4904 relating to unsworn falsification to authorities.



Ravi Harlalka
Ravi Harlalka, parent and natural guardian
of Nandini Harlalka

DATE: 09/30/2008

Prothonotary/Clerk of Courts
William A. Shaw

UCL 08 2008

FILED

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

21ST CENTURY INSURANCE) CIVIL DIVISION
Plaintiff,) 2008-934-CD
v.)
RAVI HARLALKA,)
Defendant.)

ORDER OF COURT

AND NOW, to wit this 10 day of October, 2008, upon consideration of the within Petition, it is hereby ADJUDGED, ORDERED AND DECREED that the remainder of the funds of the \$25,000.00 settlement approved by this Honorable Court on July 9, 2008, on behalf of minor, Nandini Harlalka, totaling after medical expenses approximately \$13,194 USD, shall be deposited in the name of Nandini Harlalka, a minor, into a savings account or a certificate of deposit in a Canada Deposit Insurance Corporation insured bank, savings and loan association or credit union. The savings account or certificate of deposit shall be marked "NOT TO BE WITHDRAWN UNTIL THE MINOR REACHES THE AGE OF MAJORITY OR BY FURTHER ORDER OF COURT."

Proof of deposit in a bank or savings and loan shall be promptly filed of record by Adam G. Anderson, Esquire, or Grant H. Hackley, Esquire, counsel for insurer 21st Century Insurance.

FILED
01/31/11 BCI
OCT 13 2008
60

William A. Shaw
Prothonotary/Clerk of Courts

J.

COURT DIVISION

FILED

OCT 13 2008

William A. Shaw,
Prothonotary/Clerk of Courts

DATE: 10/13/08

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

21ST CENTURY INSURANCE) CIVIL DIVISION
)
Plaintiff,) 2008-934-CD
)
)
v.)
)
RAVI HARLALKA,)
)
Defendant.)
)

FILED No CC.
m 12:40pm (60)
DEC 08 2008

William A. Shaw
Prothonotary/Clerk of Courts

FILING OF RECORD OF PROOF OF
DEPOSIT OF FUNDS PURSUANT TO
JOINT PETITION TO COMPROMISE A
MINOR'S CLAIM

Counsel for 21st Century Insurance:

Grant H. Hackley, Esquire
PA ID #206141

Adam G. Anderson, Esquire
PA ID # 93538

MARKS, O'NEILL, O'BRIEN &
COURTNEY, P.C.
Firm #263

2600 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
(412) 391-6171

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

21ST CENTURY INSURANCE)	CIVIL DIVISION
)	
Plaintiff,)	2008-934-CD
)	
V.)	
)	
RAVI HARLALKA,)	
)	
Defendant.)	

**FILING OF RECORD PROOF OF DEPOSIT OF FUNDS OF JOINT PETITION TO
COMPROMISE A MINOR'S CLAIM**

AND NOW comes 21st Century Insurance, by and through counsel, and files of record proof of deposit of funds in the name of Nandini Harlalka, pursuant to the Court's Order:

1. Plaintiff and Defendant filed a Joint Petition to Compromise a Minor's Claim on May 19, 2008. (See Exhibit A).

2. An Amended Order was granted on October 10, 2008, to accommodate Defendant's Canadian residency. (See Exhibit B).

3. The funds contemplated by the Compromise have been deposited in an account for the Minor, Nandini Harlalka, and marked not to be withdrawn until she reaches the age of 18, pursuant to the Amended Order. Certification of the same is attached as Exhibit C.

WHEREFORE, Plaintiff respectfully requests that the Certification contained in Exhibit D be filed of record, in fulfillment of the Amended Order.

Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY:

Grant H. Hackley, Esquire
Attorney for Plaintiff
21st Century Insurance

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE) CIVIL DIVISION

Plaintiff,

2008-934-CD

v.

RAVI HARLALKA,

Defendant.

JOINT PETITION TO COMPROMISE A
MINOR'S CLAIM

Counsel for 21st Century Insurance:

Adam G. Anderson, Esquire
PA ID # 93538
Grant H. Hackley, Esquire
PA ID #206141

MARKS, O'NEILL, O'BRIEN &
COURTNEY, P.C.
Firm #263

2600 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
(412) 391-6171

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAY 19 2008

Attest,

William L. Cline
Prothonotary/
Clerk of Courts

PENGAD 800-631-6889

EXHIBIT	
A	

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE)	CIVIL DIVISION
Plaintiff,)	
v.)	
RAVI HARLALKA,)	
Defendant.)	

JOINT PETITION TO COMPROMISE A MINOR'S CLAIM

TO THE HONORABLE JUDGE OF SAID COURT:

RAVI HARLALKA, parent and natural guardian of NANDINI HARLALKA, and NANDINI HARLALKA, a minor, pro se, and 21ST CENTURY INSURANCE by and through their undersigned counsel, Marks, O'Neill, O'Brien and Courtney, P.C., Adam G. Anderson, Esquire, and Grant H. Hackley, Esquire, pursuant to Pennsylvania Rules of Civil Procedure 2039 jointly petition this Honorable Court for leave to compromise the claim of Nandini Harlalka, a minor, against Defendant, Ravi Harlalka, and assigns therefore the following reasons:

1. Nandini Harlalka is a minor, born July 7, 2006.
2. Nandini Harlalka is in the care of her parent and natural guardian, Ravi Harlalka, who resides in Canada, 1514-125 Bamburgh Circle, Scarborough, Ontario, MIW3G4.
3. At the time of the incident herein described, Ravi Harlalka had abandoned his residence in the State of Ohio, and was in transit to a new residence in the State of New Jersey.

4. This action arises out of an automobile accident on September 9, 2007, in which Ravi Harlalka, was driving a motor vehicle in an easterly direction on Interstate 80 in Clearfield County, Pennsylvania.

5. Defendant Ravi Harlalka was traveling at a normal highway rate of speed when the vehicle left the roadway of Interstate 80 and overturned.

6. Minor Nandini Harlalka, date of birth July 7, 2006, was a passenger in the vehicle, and was wearing a restraint device, but suffered a one centimeter laceration to the scalp caused by the accident.

7. Minor Nandini Harlalka was airlifted by helicopter to Altoona General Hospital, where she was treated and found to be in good condition excepting the scalp laceration.

8. Minor Nandini Harlalka incurred numerous medical bills as a result of the accident and the resulting airlift and emergency room visit.

9. These expenses include but are not limited to \$11,032.00 as a result of the airlift, \$38.00 as a result of emergency room x-ray services, and \$6,322.20 for various other emergency room services for a total of \$17,392.20.

10. Defendant Ravi Harlalka is insured by 21st Century Insurance, Policy Number 5815463, with a limit of insurance of \$100,000.

11. Defendant Ravi Harlalka and 21st Century Insurance have agreed to a settlement amount of \$25,000 to resolve this matter, pursuant to claim number 731248.

12. Defendant Ravi Harlalka is unrepresented by counsel, but has provided informed consent to the compromise, in the knowledge that Attorneys Anderson and Hackley are acting on behalf of insurer.

13. Medical expenses remain outstanding, and it is the parties' intent that a portion of the settlement amount of \$25,000 be used to defray these costs.

14. Those expenses to be paid from the settlement amount of \$25,000 are:

- (a) \$11,032.00 incurred by the airlift;
- (b) \$736.20 remaining of the 6,322.20 incurred as a result of the emergency room visit, which may be further defrayed by the primary medical insurer to leave a potential final outstanding balance of \$149.00; and
- (c) \$38.00 incurred as a result of x-rays taken and not otherwise billed.
- (d) The settlement funds to be used for outstanding medical expenses shall not exceed the total of the preceding amounts, \$11,806.20.

15. As Nandini Harlalka and her natural guardian, Defendant Ravi Harlalka, are not being represented in this matter by Attorneys Anderson and Hackley, no attorney's fees have accrued against the settlement sum.

16. The parties believe the above is a fair and reasonable settlement of the matter in light of the medical expenses incurred and the nature of the relationship of the parties and the circumstances of the accident.

17. Pursuant to Pennsylvania Rule of Civil Procedure 2039, attached are exhibits including a statement of counsel that this settlement is desirable, a description of the services rendered, and a statement that because fees were not incurred by Defendant, the fees assessed were reasonable (Exhibit A).

18. Also attached as an exhibit is a statement of the doctor, by way of medical reports, who attended to the minor concerning her injuries and prognosis (Exhibit B).

Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY:



Ravi Harlalka
pro se

1514-125 Bamburgh Circle
Scarborough
Ontario, MIW3G4
Canada

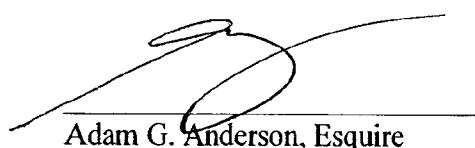
BY:


Adam G. Anderson, Esquire
PA ID # 93538

Grant H. Hackley, Esquire
PA ID # 206141

Marks, O'Neill, O'Brien & Courtney, P.C.
707 Grant Street
Gulf Tower, Suite 2600
Pittsburgh, PA 15219
Counsel for 21st Century Insurance

PREPARED BY:


Adam G. Anderson, Esquire
PA ID # 93538
Grant H. Hackley, Esquire
PA ID # 206141

Marks, O'Neill, O'Brien & Courtney, P.C.
707 Grant Street

Gulf Tower, Suite 2600
Pittsburgh, PA 15219

Counsel for 21st Century Insurance

VERIFICATION

I verify under penalty of perjury that the averments of fact made in the foregoing documents are true and correct based upon my personal knowledge, information or belief. I understand that this verification is made subject to the penalties of 18 P.A.C.S. Section 4904 relating to unsworn falsification to authorities.



Ravi Harlalka, parent and natural guardian
of Nandini Harlalka

DATE: 04/24/2008

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE

Plaintiff,

v.

RAVI HARLALKA,

Defendant.

) CIVIL DIVISION

STATEMENT OF COUNSEL

It is the professional opinion of the undersigned that the above-described agreement is a fair and reasonable settlement of the matter herein described. The attorneys prepared this pleading after communicating with Defendant Ravi Harlalka, and after communication with the insurer and upon review of the medical records and bills relating to this matter. There will be no attorney's fee incurred by Nandini Harlalka, the minor, or her father, Ravi Harlalka, the named Defendant, as the undersigned does not represent them.

Respectfully submitted,

MARKS, O'NEILL, O'BRIEN
& COURTNEY, P.C.

BY:

Adam G. Anderson, Esquire

PA ID # 93538

Grant H. Hackley, Esquire

PA ID # 206141

Marks, O'Neill, O'Brien & Courtney, P.C.

707 Grant Street

Gulf Tower, Suite 2600

Pittsburgh, PA 15219

Counsel for 21st Century Insurance.

EXHIBIT B



Name: Harlalka, Nandini
 Age: 14M DOB: 07/07/2006
 Gender: F - Wt: 13.6 Kg
 Medrec: 000000429039
 Acct: 000303640114
 Attending: DS1
 Primary Nurse: LAS
 Bed: ED WAITING

ALTOONA REGIONAL DISCHARGE INSTRUCTIONS

Patients and Families

Thank you for choosing Altoona Regional for your emergency care. We hope to provide you excellent care and we apologize for any delay. You may see many members of our team during your visit. We have many nurses, physicians, technicians and secretaries.

Your emotional and spiritual needs are very important to us. We have clergy in house if you need anything. Please just let us know.

If you have pain and it becomes worse, please talk with one of our team members. Our goal is to make you comfortable. Our discharge instructions are tailored and specific to each of your needs.

We are always open for suggestions on how we can provide excellent care to our patients.

If you had XRAYS:

The interpretation of x-rays at the time of the emergency visit may only be a preliminary report. You will be notified if there is a change in the interpretation when the x-rays are reviewed by the radiologist.

If you had CULTURES:

Cultures taken at the time of the emergency visit are not ready until one to several days afterwards. If culture results are positive, you will be notified if change in the treatment is necessary.

FINAL DIAGNOSIS EVALUATION MVC

ADDITIONAL DIAGNOSIS CLOSED HEAD INJURY

FOLLOWUP CONTACTS

SPECIAL INSTRUCTIONS

Follow up with primary care physician

Return if worse

Take medication as prescribed

MEDICAL INSTRUCTIONS

MINOR HEAD INJURY

You have been diagnosed with a minor head injury.

A minor head injury means that although you DID have trauma to your head, you did not seem to have had a serious injury to your brain. You DID NOT suffer a concussion. A concussion is a slightly more severe form of head injury in which the victim may have lost consciousness for a period of time and demonstrates some evidence of brain injury.

In the absence of serious trauma and either no loss of consciousness or a very brief loss of consciousness, X-Rays and CT scans are usually unnecessary.

Treatment includes mild pain medications and observation at home. Narcotic or strong pain medications are



Name: Harlaska, Nandini
Age: 14M DOB: 07/07/2006
Gender: F – Wt: 13.6 Kg
Medrec: 000000429039
Acct: 000303640114
Attending: DS1
Primary Nurse: LAS
Bed: ED WAITING

ALTOONA REGIONAL DISCHARGE INSTRUCTIONS

usually not necessary. In most cases, acetaminophen (Tylenol) or ibuprofen (Advil or Motrin) should manage your pain adequately.

After a minor head injury, mild headache may last for days.

Over the next 24 hours:

- Stay with family or friends that can observe your behavior.
- Avoid alcohol or drugs.

YOU SHOULD SEEK MEDICAL ATTENTION IMMEDIATELY, EITHER HERE OR AT THE NEAREST EMERGENCY DEPARTMENT, IF ANY OF THE FOLLOWING OCCURS:

- Worsening severe headache.
- Numbness, tingling, or weakness in your arms or legs.
- Fever, neck pain, change of behavior.
- Vomiting, difficulty walking or changes in vision.
- Difficulty waking from sleep with increased confusion.

SEATBELTS: There is no doubt that seatbelts save lives. Every day in the Emergency Department we see people driving without seatbelts are more severely hurt. We always buckle up. Please do the same!

HARLALKA, NANDINI Enc 303640114 /2007 ERCHRTDR 9/10/2007 1 pg
M STARTERPHYSBQJ IBEX MD REC'D M 000303640114

070909155023

DISPOSITION
PATIENT 9/9/2007 17:01 Stern Doug
Condition: MSE completed no longer has EMC. Stable.
PATIENT 9/9/2007 19:44 Stern Doug
Disposition: A. Home.

DISPOSITION
PATIENT 9/9/2007 20:25 Stoy Lori
TRANSFER IN: NO. Hold Patient: No. Campus: AH. Remove from ER.

ORDERS

Nursing Assessment by RAA Sun Sep 09 2007 15:50 Active
SINGLE VIEW CHEST by RAA Sun Sep 09 2007 16:15 Done Sun Sep 09 2007
2:11
PELVIS XRAY by RAA Sun Sep 09 2007 16:15 Active
-3 Lead EKG by LAS Sun Sep 09 2007 20:25 Sent
Hypothermia Precautions by LAS Sun Sep 09 2007 20:25 Sent

DIAGNOSIS

FINAL 9/9/2007 17:01 Stern Doug
PRIMARY: EVALUATION MVC. ADDITIONAL: CLOSED HEAD INJURY.

IMAGING
FLOW SHEET 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
RESPONSE 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
DEMO 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
CONSENT 9/9/2007 23:29 Noye Joyce
Image captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Image captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 002 addedImage captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 004 addedImage captured from scanner.
TRAUMA FLOW 1 9/9/2007 23:30 Noye Joyce
Page 003 addedImage captured from scanner.
H AND P 9/9/2007 23:30 Noye Joyce
Image captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 004 addedImage captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 003 addedImage captured from scanner.
H AND P 9/9/2007 23:31 Noye Joyce
Page 002 addedImage captured from scanner.

IMAGING
MEDICAL COMMAND 9/9/2007 16:57 McCartney Teresa
Image captured from scanner.

TRIAGE

PATIENT 9/9/2007 15:50 Adams Rhonda
NAME: Wheat Trauma. AGE: 8. GENDER: male. DOB: Thu Sep 09 1999.

HARLAKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg
PATIENTS: UNKNOWN. Current vaccinations: Unknown. Ambulance patients:
N/A. SSN: 999999999. ZIP CODE: 16601. KG WEIGHT: 13.6. BLOOD COLOR
CODE: Yellow. PHONE: 814999-9999. MEDICAL RECORD NUMBER: 000000429039.
ACCOUNT NUMBER: 000303640114. ADMISSION: Trauma.

GREET TIME 9/9/2007 15:50 Adams Rhonda

STR1 1.

PAIN 9/9/2007 15:50 Adams Rhonda

Triage assessment performed. ~~gender~~!

ADMISSION 9/9/2007 15:50 Adams Rhonda

URGENCY: 1 RESUS. ADMISSION SOURCE: Other. TRANSPORT: STAT. DEPT:

Emergency. BED: WAITING.

COMPLAINT 9/9/2007 15:50 Adams Rhonda

COMPLAINT: TRAUMA ALERT MVC.

TRIAGE TIME 9/9/2007 15:50 Adams Rhonda

STR1 1.

TRAUMA PROTOCOL

TIME OUT 9/9/2007 17:07 Stern Doug

Patient identification confirmed.

Verbal consent obtained. Performed by attending. Mechanism of
injury: MVC. Patient status: Alert. Report from EMS AIR. Dentition
not prohibitive. Oropharyngeal classification for airway exam Class
1: Able to visualize soft palate, fauces, uvula, tonsillar pillars.
Normal healthy patient.

ROS

ALL SYSTEMS NEGATIVE 9/9/2007 17:05 Stern Doug

All systems were reviewed and are negative except as described above.

PAST MEDICAL HISTORY

FAMILY HISTORY 9/9/2007 17:05 Stern Doug

Family history is not contributory to this case.

PEDIATRIC HISTORY 9/9/2007 17:05 Stern Doug

Immunizations, up to date. No recent illness. No history of maternal
infection. Feeding normally. Full term.

PED FEMALE SURGICAL HISTORY 9/9/2007 17:05 Stern Doug

Patient has had no previous surgical history.

PED SOCIAL HISTORY 9/9/2007 17:05 Stern Doug

No ill contacts. No recent travel.

NOTES 9/9/2007 17:05 Stern Doug

Nursing records reviewed. Agree with nursing records. Medication
list reviewed.

PHYSICAL EXAM

SKIN 9/9/2007 17:06 Stern Doug

Skin is warm. Skin is dry. Skin is normal color. female.

RESPIRATORY CHEST PED 9/9/2007 17:06 Stern Doug

Breath sounds clear and equal bilaterally. No respiratory distress.

No accessory muscle use. No retractions.

UPPER EXTREMITY 9/9/2007 17:06 Stern Doug

Inspection normal. No cyanosis. No clubbing. No edema. Normal
range of motion.

EYES 9/9/2007 17:06 Stern Doug

Eyes are normal to inspection. Pupils equal, round and reactive to
light. No discharge from eyes. Extraocular muscles intact. Sclera
are normal. Conjunctiva are normal.

LYMPHATIC 9/9/2007 17:06 Stern Doug

No adenopathy in neck. No adenopathy in axillae. No adenopathy in
groin.

CONSTITUTIONAL PED 9/9/2007 17:06 Stern Doug

Patient is afebrile. Triage vital signs reviewed. Well appearing.
Alert and oriented appropriate to age. uncomfortable.

HARLAKA, NANDINI Enc 303640114 9/9/2007 ERCHRTDR 9/10/2007 1 pg
MNEURO PED 9/9/2007 17:06 Stern Doug
Awake, alert appropriate for age. GCS Modified for age. No focal
motor deficits. No focal sensory deficits. No cerebellar deficits.
Speech normal. Gait normal. Memory normal.
PSYCHIATRIC 9/9/2007 17:06 Stern Doug
Oriented X 3. Normal affect. Normal insight. Normal concentration.
HEAD PED 9/9/2007 17:06 Stern Doug
Normocephalic. ABRASION TO SCALP.
NECK PED 9/9/2007 17:06 Stern Doug
Trachea midline. No masses. No lymphadenopathy. Supple.
BACK 9/9/2007 17:06 Stern Doug
There is no CVA Tenderness. There is no tenderness to palpation.
Normal inspection.
ENT PED 9/9/2007 17:06 Stern Doug
Ears and nose normal to inspection. Oropharynx normal. Mucous
membranes pink and moist. No stridor.
CARDIOVASCULAR PED 9/9/2007 17:06 Stern Doug
RRR. Heart sounds normal. Capillary refill less than 2 seconds.
Pulses 2+, equal bilaterally. No murmurs.
ABDOMEN PED 9/9/2007 17:06 Stern Doug
Abdomen is soft. Abdomen is non-tender. No distension. No masses.
Bowel sounds normal. Liver and spleen normal.
LOWER EXTREMITY 9/9/2007 17:06 Stern Doug
Inspection normal. No cyanosis. No clubbing. No edema. Normal
range of motion. No calf tenderness.
..
M
HPI MVA-MVC
HISTORIAN 9/9/2007 17:04 Stern Doug
History obtained from EMS.
OCCURRED 9/9/2007 17:04 Stern Doug
Onset of symptoms reported as sudden. Just prior to presentation.
LOCATION 9/9/2007 17:04 Stern Doug
Neck pain: None. Back pain: None. Chest pain: None. Abdominal pain:
None. Contusion/Abrasion: scalp.
ASSOCIATED WITH 9/9/2007 17:04 Stern Doug
No associated symptoms. Alcohol: Denies.
RISK FACTORS 9/9/2007 17:04 Stern Doug
Spine Injury Risk Factors: None. Intracranial Bleed Risk Factors:
None.
CHIEF COMPLAINT 9/9/2007 17:04 Stern Doug
Patient was involved in motor vehicle crash. Patient was driver.
Windshield damaged.

INSTRUCTION

INSTRUCTIONS 9/9/2007 19:44 Stern Doug

"title_info">DISCHARGE INSTRUCTIONS RECEIPT

As
Always, You are the most important factor in your recovery. Please
follow these instructions carefully. If you have problems that we
have not discussed, CALL OR VISIT YOUR DOCTOR RIGHT AWAY. If you
can't reach your doctor, return to the emergency department.

If
your physician has ordered crutches or a walker, this is the
therapeutic modality for your care. Please check the below of the
choice for this durable medical supply.

____ Home Health
Resource

____ Other by
patient

FINAL DIAGNOSIS
EVALUATION
MVC

ADDITIONAL DIAGNOSIS
CLOSED HEAD
INJURY

FOLLOWUP CONTACTS

THE FOLLOWING SPECIAL
INSTRUCTIONS WERE GIVEN
Follow up with primary care
physician
Return if worse
Take medication as
prescribed

THE FOLLOWING MEDICAL INSTRUCTIONS WERE
GIVEN
MINOR HEAD INJURY

"I
Understand the written and discussed instructions. My questions have
been
answered."

Patient .

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE)	CIVIL DIVISION
)	
Plaintiff,)	
)	
)	
v.)	
)	
RAVI HARLALKA,)	
)	
Defendant.)	

ORDER OF COURT

AND NOW, to wit this _____ day of _____, 2008, upon
consideration of the within Petition, it is hereby ADJUDGED, ORDERED AND DECREED that
the settlement offer of \$25,000.00 be approved on behalf of minor, Nandini Harlalka, and,
pursuant to Pennsylvania Rules of Civil Procedure 2039, said sum shall be deposited in the name
of Nandini Harlalka, a minor, into a savings account or a certificate of deposit in a Federally
insured bank, savings and loan association or credit union with certain medical expenses,
enumerated above, to be paid from the settlement funds, limited to the cost of the medical airlift,
the remaining cost of the emergency room visit of September 9, 2007, and the cost of a bill for x-
rays received by Ravi Harlalka dated January 3, 2008, all totaling \$11,806.20. The savings
account or certificate of deposit shall be marked "NOT TO BE WITHDRAWN UNTIL THE
MINOR REACHES THE AGE OF MAJORITY OR BY FURTHER ORDER OF COURT.".

Proof of deposit in a bank or savings and loan shall be promptly filed of record by Adam
G. Anderson, Esquire, counsel for insurer 21st Century Insurance.

J. _____
ORPHANS' COURT DIVISION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' DIVISION

21ST CENTURY INSURANCE)	CIVIL DIVISION
)	
Plaintiff,)	
)	
)	
v.)	
)	
RAVI HARLALKA,)	
)	
Defendant.)	

ORDER OF COURT

AND NOW, this _____ day of _____, 2008, a hearing found to be
necessary, it is hereby ordered that hearing on the above-named parties' Joint Petition to
Compromise a Minor's Claim, is scheduled for _____, 2008 at _____. m.

J. _____
ORPHANS' COURT DIVISION

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

21ST CENTURY INSURANCE) CIVIL DIVISION
)
Plaintiff,) 2008-934-CD
)
)
v.)
)
RAVI HARLALKA,)
)
Defendant.)

ORDER OF COURT

AND NOW, to wit this 10 day of October, 2008, upon
consideration of the within Petition, it is hereby ADJUDGED, ORDERED AND DECREED that
the remainder of the funds of the \$25,000.00 settlement approved by this Honorable Court on
July 9, 2008, on behalf of minor, Nandini Harlalka, totaling after medical expenses
approximately \$13,194 USD, shall be deposited in the name of Nandini Harlalka, a minor, into a
savings account or a certificate of deposit in a Canada Deposit Insurance Corporation insured
bank, savings and loan association or credit union. The savings account or certificate of deposit
shall be marked "NOT TO BE WITHDRAWN UNTIL THE MINOR REACHES THE AGE OF
MAJORITY OR BY FURTHER ORDER OF COURT."

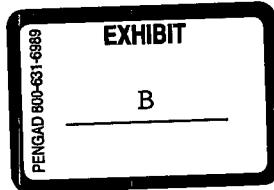
Proof of deposit in a bank or savings and loan shall be promptly filed of record by Adam
G. Anderson, Esquire, or Grant H. Hackley, Esquire, counsel for insurer 21st Century Insurance.

/S/ Fredric J Ammerman

J.

COURT DIVISION

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.



OCT 13 2008

Attest.

William L. Ammerman
Prothonotary/
Clerk of Courts



Canada Trust

TD Canada Trust
7080 Warden Avenue
Markham, Ontario L3R 5Y3
T: 905 475 7598 F: 905 475 8284

December 1, 2008

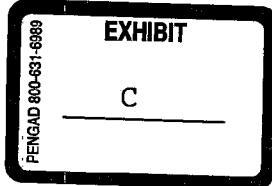
Re: Nandini Ravi Harlalka
125 Bamburgh Circle Apt 1514
Scarborough On M1W 3G4
Canada

Account# 1882-6336949 & Term 1882-8015722

To Whom It May Concern:

This is to certify that the above client has a TD Bank Account and a Term Deposit Account totaling of \$16,100.00 CDN with us. The funds cannot be withdrawn until Nandini Harlalka reaches the age of 18. Should you require further assistance, please contact the undersigned @905-475-7598.


Miranda Cheng
Financial Services Representative

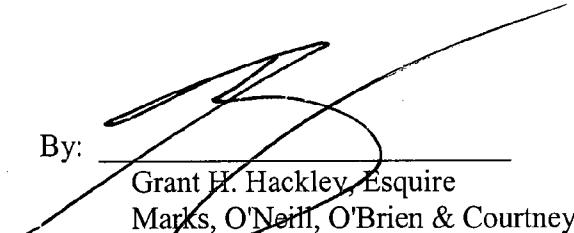


Member of TD Bank Financial Group

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing was served upon the following by U.S. mail, this 5th day of December, 2008.

Ravi Harlalka
125 Bamburgh Circle, Apt. 1514
Scarborough, Ontario, M1W3G4
Canada

By: 

Grant H. Hackley, Esquire
Marks, O'Neill, O'Brien & Courtney, P.C.
704 Grant Street
Gulf Tower, Suite 2600
Pittsburgh, PA 15219

Attorney for Plaintiff
21st Century Insurance