

08-933-CD
State Farm Ins. Vs Richard Queen al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

State Farm Insurance A/S/O

Shannon Forcey

PO Box 2373, Bloomington, IL 61702

(Plaintiff)

VS.

Richard C. Queen
432 River Road, Clearfield, PA 16830

George Queen

432 River Road, Clearfield, PA 16830
(Defendant)

CIVIL ACTION

No: 2008-933-CD

Type of Case: _____

Type of Pleading: Civil Action-LAW

Filed on Behalf of:

The Plaintiff(s)
(Plaintiff/Defendant)

Paul J. Hennessy, Esq.

(Filed by)

142 W. Market Street

West Chester, PA 19382

(Address)

610-431-2727

(Phone)

(Signature)

FILED
M 1:46 p.m. CK
MAY 19 2008
William A. Shaw
Prothonotary/Clerk of Courts
ATTY PAID 95.00
ICC ATTY
2CL TO SHERIFF

Paul J. Hennessy, Esquire
Hennessy & Walker Group, P.C.
142 W. Market Street
West Chester, PA 19382
610-431-2727
Attorney I.D. 65396

Attorney for Plaintiffs

State Farm Mutual Automobile
Insurance Company
A/S/O Shannon Forcey
PO Box 2373
Bloomington, IL 61702-2373

: In The Court of Common Pleas

: Clearfield County, Pennsylvania

: Civil Action Law

VS

: No

Richard C. Queen
432 River Road
Clearfield, PA 16830
AND
George Queen
432 River Road
Clearfield, PA 16830

NOTICE

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 or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

David S. Meholick, Court Admin.
Clearfield County Courthouse
Clearfield, PA 16830
814-465-2641 ext. 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo a partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleva esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por teléfono a la oficina cuya dirección se encuentra escrita abajo para averiguar dónde se puede conseguir asistencia legal.

David S. Meholick, Court Admin.
Clearfield County Courthouse
Clearfield, PA 16830
814-465-2641 ext. 5982

Paul J. Hennessy, Esquire
Hennessy & Walker Group, P.C.
142 W. Market Street
West Chester, PA 19382
610-431-2727
Attorney I.D. 65396

Attorney for Plaintiffs

State Farm Mutual Automobile
Insurance Company
A/S/O Shannon Forcey
PO Box 2373
Bloomington, IL 61702-2373

: In The Court of Common Pleas
: Clearfield County, Pennsylvania
: Civil Action Law

VS

: No

Richard C. Queen
432 River Road
Clearfield, PA 16830
AND
George Queen
432 River Road
Clearfield, PA 16830

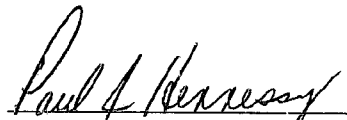
COMPLAINT

- 1) Plaintiff State Farm Mutual Automobile Insurance Company (hereinafter State Farm) is an insurance company licensed and authorized to conduct business in the Commonwealth of Pennsylvania and having as one of its principal places of business the above captioned address.
- 2) Shannon Forcey is an adult individual insured with State Farm Insurance on November 29, 2006
- 3) Defendant Richard C. Queen is an adult individual who resides at the above captioned address.
- 4) Defendant George Queen is an adult individual who resides at the above captioned address.
- 5) On or about 11/29/2006 Plaintiff State Farm Insurance Company insured Shannon Forcey with a personal auto policy, policy number 0882-605-38 said policy covering a 2002 Pontiac Grand Am and carrying with same collision and rental coverages.
- 6) On or about 11/29/2006, Defendant Richard C. Queen was acting as agent, servant, employee and/or workman and/or for the common purpose of

Defendant George Queen while he was operating 1991 Plymouth Voyager bearing PA tag FXT-6397 registered to George Queen.

- 7) On or about 11/29/2006 at or near Clearfield High School in Lawrence Township, Clearfield County, Pennsylvania. Defendant Richard C. Queen while operating the aforesaid Plymouth Voyager, acting as an agent did negligently, carelessly and/or recklessly, strike/collide into Plaintiff's insured's Pontiac Grand Am causing extensive damages to same.
- 8) The negligence of the Defendants consisted of:
 - a) negligent entrustment;
 - b) failing to exercise due care;
 - c) being inattentive;
 - d) failing to maintain proper lookout;
 - e) careless driving;
 - f) failing to yield right of way;
 - g) failing to give due regard to the right, safety, point and position of plaintiff's property:
- 9) The aforesaid collision resulted solely from the negligent acts and/or failure to act on part of Defendants named herein and was due in no manner whatsoever to any act and/or failure to act on part of Plaintiff's insured.
- 10) Pursuant to the aforesaid policy of insurance, Plaintiff State Farm Insurance Company settled the collision and rental claims of its insured Shannon Forcey in the amount of \$6,106.28, (said figure includes Plaintiff's insured's first party deductible) representing fair and reasonable reimbursement for the damages sustained.
- 11) Pursuant to the aforesaid policy of insurance, Plaintiff State Farm Ins. is subrogated to Shannon Forcey for this loss.

WHEREFORE, Plaintiffs demand judgment against Defendants jointly and severally in the amount of \$6,106.28 together plus costs, interest and such other relief this Court finds equitable and just.


Paul J. Hennessy, Esq.

SUM-4193-PA

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF CHESTER

: ss

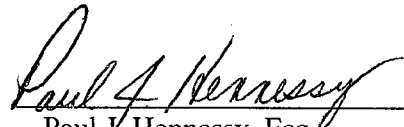
The undersigned verifies that the facts contained herein are true and correct.

The undersigned understands that false statements herein are made subject to the penalties of 19 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

If applicable, this affidavit is made on behalf of the Plaintiff(s); that the said Plaintiff(s) is/are unable and unavailable to make this verification on its/his/her own behalf within the time allotted for filing of this pleading, and the facts set forth

in the foregoing pleading are true and correct to the best of counsel's knowledge, information and belief.

This verification is made pursuant to Pa. R.C.P. 1024 and is based on interviews, conferences, reports, records and other investigative material in the file


Paul J. Hennessy, Esq.
Hennessy & Walker Group, P.C.

Dated: 5/14/08

FILED

MAY 19 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-933-CD

STATE FARM INSURANCE A/S/O
vs
RICHARD C. QUEEN and GEORGE QUEEN
COMPLAINT

SERVICE # 1 OF 2

SERVE BY: 06/18/2008 HEARING: PAGE: 104190

DEFENDANT: RICHARD C. QUEEN
ADDRESS: 432 RIVER ROAD
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW 30th May 2008 AT 10:07 AM/PM SERVED THE WITHIN

COMPLAINT ON RICHARD C. QUEEN, DEFENDANT

BY HANDING TO George Queen, Father

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED 432 River Road CLFD

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR RICHARD C. QUEEN

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO RICHARD C. QUEEN

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answered CHESTER A. HAWKINS, SHERIFF

BY: George F. DeHaven
Deputy Signature

George F. DeHaven
Print Deputy Name

FILED
06/30/08
MAY 30 2008
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-933-CD

STATE FARM INSURANCE A/S/O

VS

RICHARD C. QUEEN and GEORGE QUEEN
COMPLAINT

SERVICE # 2 OF 2

SERVE BY: 06/18/2008

HEARING:

PAGE: 104190

DEFENDANT: GEORGE QUEEN
ADDRESS: 432 RIVER ROAD
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

FILED

06/30/08
MAY 30 2008

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW 30th May 2008 AT 10:07 AM / PM **SERVED** THE WITHIN

COMPLAINT ON GEORGE QUEEN, DEFENDANT

BY HANDING TO

George Queen

Def

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED

432 River Road CEFD

NOW _____ AT _____ AM / PM **POSTED** THE WITHIN

COMPLAINT FOR GEORGE QUEEN

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO GEORGE QUEEN

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answered: CHESTER A. HAWKINS, SHERIFF

BY:

George F. DeHaven
Deputy Signature

GEORGE F. DeHaven
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104190
NO: 08-933-CD
SERVICES 2
COMPLAINT

PLAINTIFF: STATE FARM INSURANCE A/S/O
vs.
DEFENDANT: RICHARD C. QUEEN and GEORGE QUEEN

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	HENNESSY	4245	20.00
SHERIFF HAWKINS	HENNESSY	4245	26.00

FILED

012:45 CH
AUG 29 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

State Farm Insurance A/S/O

Shannon Forcey

PO Box 2373

Bloomington, IL 61702
(Plaintiff)

VS.

Richard C. Queen

432 River Road, Clearfield, PA 16830

George Queen

432 River Road, Clearfield, PA 16830
(Defendant)

CIVIL ACTION

No: 2008-933-CD

Type of Case: _____

Type of Pleading: Civil Action-LAW

Filed on Behalf of:

The Plaintiff(s)
(Plaintiff/Defendant)

Paul J. Hennessy, Esq.
(Filed by)

142 W. Market Street

West Chester, PA 19382

(Address)

610-431-2727

(Phone)

(Signature)

FILED

OCT 02 2008

Atty. pd.
\$20.00

1cc Notice
to Defs.

William A. Shaw
Prothonotary/Clerk of Courts

Statement to 1cc
to Atty. Hennessy

610

Paul J. Hennessy, Esquire
Hennessy & Walker
142 W. Market Street
West Chester, PA 19382
610-431-2727
Attorney I.D. 65396

Attorney for Plaintiffs

State Farm Insurance
A/S/O Shannon Forcey

: In The Court of Common Pleas

: Clearfield County, Pennsylvania

VS

: Civil Action Law

Richard C. Queen
AND
George Queen

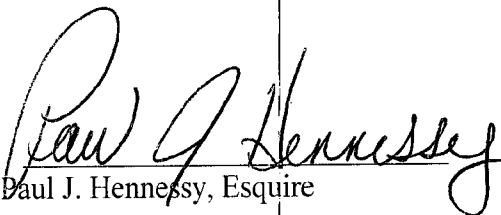
: No: 2008-933-CD

PRAECIPE FOR JUDGMENT

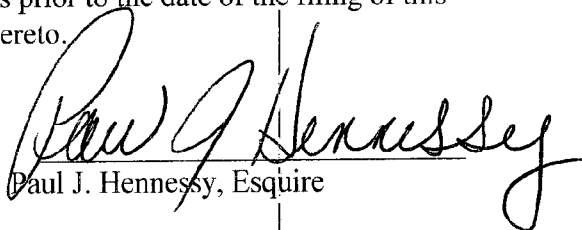
TO THE PROTHONOTARY:

Enter Judgment in the above case by default for want of response to the Complaint filed against the Defendant, Richard C. Queen AND George Queen, and assess the damages as per the statement below:

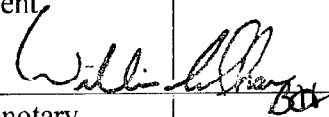
Real Debt: \$6,106.28


Paul J. Hennessy, Esquire

I hereby certify that written notice of the intention to file this Praecipe was mailed to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the filing of this Praecipe. A copy of said notice is attached hereto.


Paul J. Hennessy, Esquire

And now, October 2, 2008, Judgment entered in favor of the Plaintiff and against the Defendant by default for want of response to the Complaint and damages assessed at the sum of \$6,106.28 as per above statement.


Prothonotary

COPY

(RULE OF CIVIL PROCEDURE NO. 236) - REVISED

State Farm Insurance
A/S/O Shannon Forcey

: In The Court of Common Pleas

: Clearfield County, Pennsylvania

VS

: Civil Action Law

Richard C. Queen
AND
George Queen

: No: 2008-933-CD

NOTICE IS GIVEN THAT A JUDGMENT IN THE ABOVE CAPTIONED MATTER
HAS BEEN ENTERED AGAINST YOU.


PROTHONOTARY

If you have any questions concerning the above, please contact:

Paul J. Hennessy, Esquire
Attorney or Party Filing

142 West Market Street, Suite 2
West Chester, PA 19382
610-431-2727



OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS

Dated: September 5, 2008

To: • Richard C. Queen
432 River Road
Clearfield, PA 16830

• George Queen
432 River Road
Clearfield, PA 16830

State Farm Insurance
a/s/o Shannon Forcey

: COURT OF COMMON PLEAS

: Clearfield County, Pennsylvania

VS

Richard C. Queen AND George Queen

: No: 2008-933-CD

Notice, Rule 237.5
Notice of Praeipce to Enter Judgment by Default

IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by 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 notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help.

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-465-2641 ext. 5982

NOTIFICACION IMPORTANTE

Usted se encuentra en estado de rebeldia por no haber presentado una comparecencia escrita, ya seapersonalmente o por abogado y por no haber radicado por escrito con este Tribunal sus defenses u objeciones a los reclamos formulados en contra suyo. Al no tomar la accion debida dentro de **diez (10) dias** de la fecha de esta notificacion, el Tribunal podra, sin necesidad de comparecer usted en corte u oir prueba alguna, dictar sentencia en su contra y usted podria perder bienes u otros derechos importantes. Debe llevar esta notifiacion a unabogado inmediatamente. Si usted no tiene abogado, o si no tiene dinero suficiente para tal sericio, vaya en persona o llame por telefono a la oficina, nombrada para averiguar si puede conseguir asistencia legal.

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-465-2641 ext. 5982

If you have any question concerning this notice, please call:

Paul J. Hennessy, Esq.

(Name of Attorney or Plaintiff)

142 W. Market St., Ste 2 West Chester, PA 19382

(Attorney's or Plaintiff's Address)

at this telephone number: 610-431-2727

State Farm Insurance
A/S/O Shannon Forcey

VS

Richard C. Queen
AND
George Queen

: In The Court of Common Pleas
: Clearfield County, Pennsylvania
: Civil Action Law
: No: 2008-933-CD

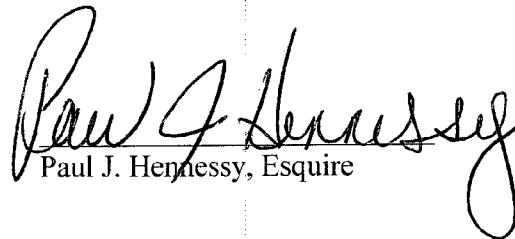
AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF PENNSYLVANIA:

: ss.

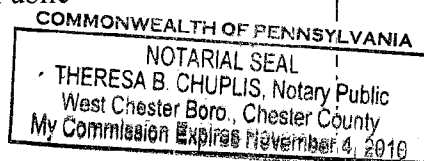
COUNTY OF CHESTER :

Paul J. Hennessy, Esquire, being duly sworn according to law, deposes and says that he represents the Plaintiff(s) in the above entitled case; that he is authorized to make this affidavit on behalf of the Plaintiff(s); and that the above named Defendant(s) is(are) unknown years of age; the address of Defendant(s) is 432 River Road, Clearfield, PA 16830; occupation of Defendant(s) is unknown; and Defendant is not in the Military Service of the United States nor any State or Territory thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 and the amendments thereto.


Paul J. Hennessy, Esquire

Sworn to and subscribed
before me this 25TH day
of SEPTEMBER, 2008.


Notary Public



Copy

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

State Farm Insurance A/S/O
Shannon Forcey
Plaintiff(s)

No.: 2008-00933-CD

Real Debt: \$6,106.28

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Richard C. Queen
George Queen
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 2, 2008

Expires: October 2, 2013

Certified from the record this 2nd day of October, 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

DL-201 (12-93)
Bureau of Driver Licensing
P.O. Box 60037
Harrisburg, PA 17106-0037

**CERTIFICATION OF
MOTOR VEHICLE JUDGMENT**

COURT INFORMATION		
COURT	Court of Common Pleas	
COUNTY	Clearfield	
DOCKET	2008-933-CD	
YEAR	2008	

TO THE SECRETARY OF TRANSPORTATION

This is to certify that on 10/2/2008 a judgment for \$ 6106.28 plus _____ was entered again 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		MONTH	DAY	YEAR
Richard	C	Queen	M	10	3	1989
ADDRESS						
432 River Road						
CITY			STATE	ZIP CODE	SOCIAL SECURITY NUMBER	
Clearfield			PA	16830		
DRIVER NUMBER			STATE	DATE OF ACCIDENT	CLAIM NUMBER	
28708657			PA	11/29/2006	SUM-4193-PA	

☐ Check this block if defendant is a resident of another state

JUDGEMENT CREDITOR

State Farm Insurance a/s/o Shannon Forcey
(NAME)

c/o 142 West Market Street, Suite 2
(STREET ADDRESS)

West Chester, PA 19382
(CITY & STATE) (ZIP)

610-431-2727
(TELEPHONE NUMBER)

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

Paul J Hennessy, Esquire
(NAME)

142 West Market Street, Suite 2
(STREET ADDRESS)

West Chester, PA 19382
(CITY & STATE) (ZIP)

610-431-2727
(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 THEREFORM.

IN WITNESS WHEREOF, I have herunto affixed my hand and seal
of the court this Day of March 7, 2011

SEAL

(SIGNATURE OF CLERK OR JUDGE OF THE
COURT IN WHICH THE JUDGMENT WAS RENDERED)

William A. Shaw
(TYPE OR PRINT NAME)

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

Robert W. Allen, Esquire
Gluck & Allen, LLC
217 Washington Street
Toms River, NJ 08753
(732) 505-4800
Attorney I.D. 320350

Attorney for Plaintiffs

1cc Atty Allen
FILED
10:29
S JAN 25 2017
MYHS/HS
BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS

State Farm Insurance
a/s/o Shannon Forcey

: In the Court of Common Pleas

: Clearfield County, Pennsylvania

VS.

: Civil Action Law

Richard C. Queen
AND
George Queen

: No.: 2008-933-CD

PRAECIPE FOR APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of the Plaintiff, State Farm Insurance a/s/o Shannon Forcey, in the above-captioned matter.

I hereby certify that this change is not intended to, nor will it, delay this proceeding to the best of my knowledge, information and belief.

Papers may be served at the address set forth above.

Respectfully submitted,

By:



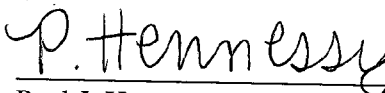
Robert W. Allen, Esquire
Attorney for Plaintiff
Our File No.: 2073-34

PRAECIPE FOR WITHDRAWAL OF APPEARANCE

TO THE PROTHONOTARY:

Please withdraw my appearance on behalf of Plaintiff, State Farm Insurance a/s/o Shannon Forcey.

By:



Paul J. Hennessy, Esq.
Attorney ID No. 65396

Dated: January 23, 2017

CA

9

Robert W. Allen, Esquire
Gluck & Allen, LLC
217 Washington Street
Toms River, NJ 08753
(732) 505-4800
Attorney I.D. 320350

FILED
m/m/m/m 8:55
MAR 08 2018
7:00 PM LCC Atty. Allen
BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS

Attorney for Plaintiffs

State Farm Insurance
a/s/o Shannon Forcey

VS.

Richard C. Queen
AND
George Queen

: In the Court of Common Pleas
:
: Clearfield County, Pennsylvania
:
: Civil Action Law
:
: No.: 2008-933-CD

ORDER TO SATISFY

To the Prothonotary:

Please mark the judgment on the above captioned case as Satisfied as to all parties.



Robert W. Allen, Esq.
Gluck & Allen, LLC

Our File No.: 2073-34

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by:

A handwritten signature in black ink, appearing to read 'R. Allen', is written over a horizontal line.

Robert W. Allen, Esq.
Attorney for Plaintiff(s)
Attorney ID No. 320350
217 Washington Street
Toms River, NJ 08753
(732) 505-4800