

08-1260-CD

Robert Adams vs Terry Jo Peters

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

Robert W. Adams,

Plaintiff,

vs.

Terry Jo Peters,

Defendant.

\*

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\*

\*

No. 2008- 1260 -C.D.

\*

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\*

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\* **Type of Case:** Civil: Trespass

\*

\*

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\* **Type of Pleading:** Praeclipe for Writ of Summons

\*

\*

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\*

\*

\* **Filed on Behalf of:** Plaintiff

\*

\*

\* **Counsel of Record for this Party:**

\* John Sughrue, Esquire

\* Attorney I. D. No. 01037

\* 225 East Market Street

\* Clearfield, PA 16830

\* Phone: (814) 765-1704

\* Fax: (814) 765-6959

\*

\* **Other Counsel of Record:**

\*

\*

\*

\*

\*

\*

\*

\*

FILED

07/10/2008

3 CC & 3 Writs  
to Atty Sughrue

Atty pd. \$95.00

William A. Shaw  
Prothonotary/Clerk of Courts

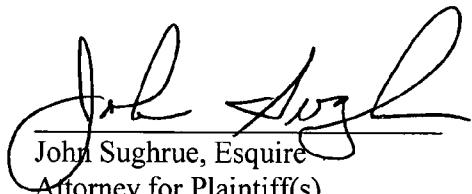
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION—LAW

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-\_\_\_\_\_ -C.D.  
\*  
\*  
Terry Jo Peters, \*  
Defendant. \*

**PRAECIPE FOR WRIT OF SUMMONS**

TO: WILLIAM A. SHAW, PROTHONOTARY.

Kindly issue a Writ of Summons in a civil action in the above-captioned matter directed to Terry Jo Peters, Defendant. The amount in controversy is in excess of \$20,000. A jury trial is demanded. Certify the Writ of Summons to the Sheriff of Clearfield County with directions to serve the same on Defendant, Terry Jo Peters at his residence, 503 Hollow Road, Curwensville, Clearfield County, Pennsylvania, 16833.



John Sughrue, Esquire  
Attorney for Plaintiff(s)  
Attorney I. D. #01037  
225 East Market Street  
Clearfield, PA 16830  
Phone: (814) 765-1704  
Fax: (814) 765-6959

cc: Chester A. Hawkins, Sheriff

**FILED**

**JUL 10 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

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

CO

**SUMMONS**

**Robert W. Adams**

Vs.

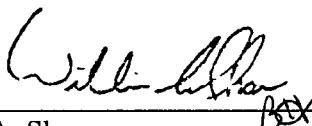
**NO.: 2008-01260-CD**

**Terry Jo Peters**

TO: **TERRY JO PETERS**

To the above named Defendant(s) you are hereby notified that the above named Plaintiff(s) has/have commenced a Civil Action against you.

Date: 7/10/2008

  
\_\_\_\_\_  
William A. Shaw  
Prothonotary

Issuing Attorney:

John Sughrue  
225 East Market Street  
Clearfield, PA 16830  
(814) 765-1704

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1260-CD

ROBERT W. ADAMS  
vs  
TERRY JO PETERS

SERVICE # 1 OF 1

SUMMONS

SERVE BY: 08/09/2008 HEARING: PAGE: 104394

DEFENDANT: TERRY JO PETERS  
ADDRESS: 503 HOLLOW ROAD  
CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

FILED

013:07:00  
JUL 18 2008

William A. Shaw  
Prothonotary/Clerk of Courts

**SHERIFF'S RETURN**

NOW, July 18, 2008 AT 2:25 AM / PM SERVED THE WITHIN  
SUMMONS ON TERRY JO PETERS, DEFENDANT  
BY HANDING TO Terry Jo Peters 1. Defendant

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

ADDRESS SERVED 503 Hollow Rd, Curwenville, PA 16833

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

SUMMONS FOR TERRY JO PETERS

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO TERRY JO PETERS

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Margiello  
Deputy Signature

Dominic L. Margiello  
Print Deputy Name

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

ROBERT W. ADAMS,

CIVIL ACTION - LAW

Plaintiff,

Number 1260 of 2008, C. D.

vs.

Type of Case: Civil Division

TERRY JO PETERS,

Type of Pleading: Appearance

Defendant.

Filed on Behalf of: Plaintiff

Counsel of Record for this Party:  
John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED NO CC  
M 10:46 AM  
AUG 21 2008  
60

William A. Shaw  
Prothonotary/Clerk of Courts

ROBERT W. ADAMS,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law

\*

\*

\*

\*

\* Number 1260 of 2008, C. D.

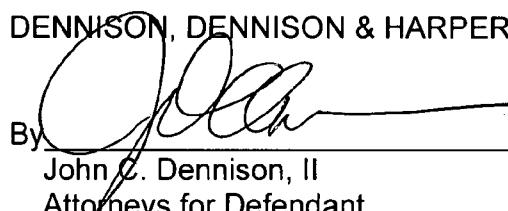
#### APPEARANCE

TO WILLIAM SHAW, PROTHONOTARY:

Enter our Appearance on behalf of Terry Jo Peters, the Defendant in the above captioned matter.

DENNISON, DENNISON & HARPER

By

  
John C. Dennison, II  
Attorneys for Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

ROBERT W. ADAMS,

CIVIL ACTION - LAW

Plaintiff,

Number 1260 of 2008, C. D.

vs.

Type of Case: Civil Division

TERRY JO PETERS,

Type of Pleading: Praeclipe for Rule  
To File Complaint

Defendant.

Filed on Behalf of: Defendant

Counsel of Record for this Party:  
John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED *10:40 AM to Atty*  
*AUG 21 2008* *Dennison*  
William A. Shaw  
Prothonotary/Clerk of Courts *(60)*

ROBERT W. ADAMS,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law

\*

\*

\*

\*

\* Number 1260 of 2008, C. D.

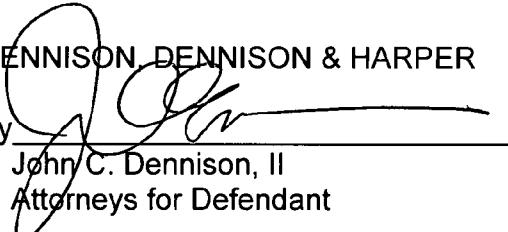
#### PRAECIPE FOR RULE TO FILE COMPLAINT

TO WILLIAM SHAW, PROTHONOTARY:

Enter a Rule upon the Plaintiff to file a Complaint within twenty (20) days after service of the Rule, or judgment of non-pros will be entered.

DENNISON, DENNISON & HARPER

By

  
John C. Dennison, II  
Attorneys for Defendant

#### RULE:

TO THE PLAINTIFF:

You are ruled to file a Complaint within twenty (20) days after the service hereof or judgment of non-pros will be entered against you.

  
\_\_\_\_\_  
Prothonotary

Dated: August 21, 2008

FILED

AUG 21 2008

William A. Shaw  
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

ROBERT W. ADAMS,

CIVIL ACTION - LAW

Plaintiff,

Number 1260 of 2008, C. D.

vs.

Type of Case: Civil Division

TERRY JO PETERS,

Type of Pleading: Certificate of Service

Defendant.

Filed on Behalf of: Defendant

Counsel of Record for this Party:  
John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

FILED  
m 10:30 AM NO CC  
AUG 26 2008  
WAS  
William A. Shaw  
Prothonotary/Clerk of Courts

ROBERT W. ADAMS,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law

\*

\*

\*

\*

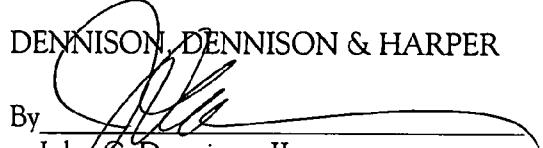
\* Number 1260 - 2008 C. D.

#### CERTIFICATE OF SERVICE

I certify that a Rule to File Complaint in the above matter was served on the Plaintiff, Robert W. Adams, on the 25<sup>th</sup> day of August, 2008, by United States Mail, First Class, postage prepaid, addressed to his attorney, John Sughrue, Esq., 225 East Market Street, Clearfield, PA 16830.

DENNISON, DENNISON & HARPER

By

  
John C. Dennison, II

Attorneys for Defendant

**FILED**

**AUG 26 2009**

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

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

Robert W. Adams,

Plaintiff,

vs.

\* No. 2008-1260-C.D.

Terry Jo Peters,

Defendant.

\* **Type of Case:** Civil: Trespass

\* **Type of Pleading:** Complaint

\* **Filed on Behalf of:** Plaintiff

\* **Counsel of Record for this Party:**

\* John Sughrue, Esquire  
\* Attorney I. D. No. 01037  
\* 225 East Market Street  
\* Clearfield, PA 16830  
\* Phone: (814) 765-1704  
\* Fax: (814) 765-6959

\* **Other Counsel of Record:**

\* John C. Dennison, II, Esquire  
\* Dennison, Dennison & Harper  
\* Attorney I.D. No. 29408  
\* 293 Main Street  
\* Brookville, PA 15825  
\* Phone: (814) 849-8316  
\* Fax: (814) 849-4656

FILED 3cc  
03/5/2008 Atty Sughrue  
SEP 15 2008

William A. Shaw  
Prothonotary/Clerk of Courts

©K

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

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
\*  
Terry Jo Peters, \*  
Defendant. \*

**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(s). You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

Court Administrator's Office  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16830  
(814) 765-2641, Extension 5982

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

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
\*  
Terry Jo Peters, \*  
Defendant. \*

**COMPLAINT**

**Count I: Compensatory Damages**

AND NOW, comes **ROBERT W. ADAMS**, Plaintiff, by his Attorney, John Sughrue, and files this Complaint in a Civil Action against **TERRI JO PETERS**, above named Defendant, upon causes of action whereof the following is the statement:

1. The Plaintiff, Robert W. Adams, is an adult individual who resides at 2530 Meadow Road, Clearfield, Clearfield County, PA, 16830.
2. The Defendant, Terri Jo Peters, is an adult individual who presently resides and at all times relevant hereto resided at 503 Hollow Road, Curwensville, Clearfield County, PA, 16833.
3. The events and conduct complained of herein occurred on or about Saturday, April 21, 2007 at Defendant's residential property, 503 Hollow Road, Curwensville, Clearfield County, PA, 16833.
4. At said time, the Plaintiff was an employee of D.C. Guelich Explosive Company, a Pennsylvania Corporation located in Clearfield, Pennsylvania that provides blasting and explosive services to the coal industry.

5. At said time and place, Plaintiff, in accordance with prior arrangements, traveled to Defendant's residence in response to various complaints that the Defendant had lodged concerning damages allegedly caused by blasting activity of D.C. Guelich Explosive Company at a coal strip mining operation near Defendant's residence.

6. At said time, Plaintiff went to Defendant's residence and engaged Defendant in a conversation for the purpose of hearing and discussing his complaints, for the purpose of evaluating the complaints, discussing resolution and determining whether or not action was required.

7. At said time and place, the Defendant, without provocation and without justification of any kind, became angry and willfully and intentionally assaulted Plaintiff, generally and in the following particulars:

- a. He verbally threatened Plaintiff with physical harm;
- b. He threatened and menaced Plaintiff with threatening gestures and movement;
- c. He struck Plaintiff with his fist on the right side of Plaintiff's head;
- d. He physically knocked Plaintiff to the ground with the aforesaid blow;
- e. By his menacing acts and words, he placed Plaintiff in fear of further assault and fear for his safety;
- f. As Plaintiff attempted to flee and retreat from Defendant's residence to avoid further assault, Defendant chased Plaintiff from his premises, causing Plaintiff to strain the muscles of his left leg and fall to the ground and land on his right shoulder;
- g. He otherwise conducted himself in such a manner, including placing leather gloves on his hands prior to the assault to cause the Plaintiff to be immediately in fear of imminent bodily injury and fear for his well-being and indeed his life.

8. At said time and place and as a result of the aforesaid assault, Plaintiff sustained emotional and physical injuries, some which may be serious and/or permanent, generally and in the following particulars:

- A. Fear of imminent bodily injury;
- B. Pain to the head;
- C. A strain or tear of the muscles of the left leg;
- D. Sprain of the rotator cuff of the right shoulder;
- E. Tear of the rotator cuff of the right shoulder;
- F. Strain, sprain and/or tear of the capsulit part of the right shoulder;
- G. Sprain or strain to the knee or, in the alternative, an aggravation of a pre-existing condition of the muscles and tissue of the knee;
- H. Bruises, abrasions and contusions about the body;
- I. Aggravation of a pre-existing condition with respect to the muscles and soft tissue of the left leg and right shoulder;
- J. Other injuries and consequential conditions, some of which may be serious and possibly permanent.

9. The Defendant's conduct, as aforesaid, and the Plaintiff's injuries resulting therefrom, as aforesaid, is the direct and legal cause of the Plaintiff incurring the following damages:

- A. Plaintiff has in the past and may continue in the future to endure significant, pain, suffering and inconvenience
- B. He has in the past expended sums and may in the future be required to expend additional sums of money for medical and surgical services, physical therapy, hospitalization, nursing service, medical supply, therapy and rehabilitation services,

appliances, medicines, drugs, transportation, lodging and other services and merchandise related to his medical treatment, care, rehabilitation and cure;

C. He may, in the future, be required to undergo surgery for the repair of his injured right shoulder and injured knee and is expected to incur hospitalization and rehabilitation costs as a result thereof;

D. Plaintiff has in the past and may continue in the future to endure significant, pain, suffering and inconvenience;

E. His general health, strength and vitality have been impaired and diminished and his ability to enjoy and live a full beneficial life has been impaired and diminished;

F. Such other damages as are provided under the law and under the circumstances of this case.

**WHEREFORE**, Plaintiff, **ROBERT W. ADAMS**, claims damages of the Defendant in a sum in excess of \$50,000 together with interest; and requests Judgment in his favor and against the Defendant in the amount of damages awarded plus interest and costs of suit; and, **FURTHER**, demands a Jury Trial on all matters and issues raised herein.

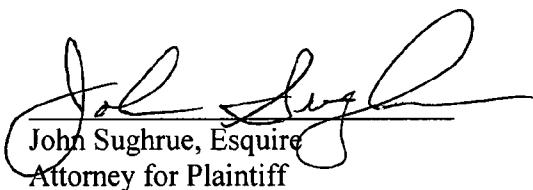
**Count II: Punitive Damages**

10. The facts and averments set forth above in paragraphs 1 through 9 are incorporated herein by reference as though the same were set forth herein at length verbatim.

11. The Defendant's conduct as aforesaid was so willful, wanton, antisocial, dangerous and otherwise so outrageous under the law and under the circumstances that it warrants the awarding of punitive damages to the Plaintiff in order to punish the Defendant and to deter the Defendant and the public at large from engaging in such conduct in the future.

**WHEREFORE**, Plaintiff, **ROBERT W. ADAMS**, claims punitive damages of the Defendant in a sum in excess of \$50,000 together with interest; and requests Judgment in his favor and against the Defendant in the amount of damages awarded plus interest and costs of suit; and, **FURTHER**, demands a Jury Trial on all matters and issues raised herein.

Respectfully submitted,



John Sughrue, Esquire  
Attorney for Plaintiff

**VERIFICATION**

I, Robert W. Adams, Plaintiff, verify that the statements made in this COMPLAINT are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: September 15, 2008

  
Robert W. Adams  
Robert W. Adams, Plaintiff

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

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
Terry Jo Peters, \*  
Defendant. \*

**CERTIFICATE OF SERVICE**

AND NOW, I do hereby certify that on September 15, 2008, I caused a true and correct copy of the COMPLAINT to be served on the following and in the manner indicated below:

**By United States Mail, First Class, Postage Prepaid**  
**Addressed as Follows:**

John C. Dennison, II, Esquire  
Dennison, Dennison & Harper  
293 Main Street  
Brookville, PA 15825

Date: September 15, 2008



John Sughrue, Esquire  
Attorney for Plaintiff, Robert W. Adams

**FILED**

SEP 15 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104394  
NO: 08-1260-CD  
SERVICES 1  
SUMMONS

PLAINTIFF: ROBERT W. ADAMS  
VS.  
DEFENDANT: TERRY JO PETERS

**SHERIFF RETURN**

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	SUGHRUE	6808	10.00
SHERIFF HAWKINS	SUGHRUE	6808	25.44

5  
FILED  
013:40 cm  
OCT 13 2008  
WAS  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2008



Chester A. Hawkins  
Sheriff

**FILED**

**OCT 13 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

OCT 29 2008

5 m/10/08/c  
William A. Shaw  
Prothonotary/Clerk of Courts

No 91 C 60

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

ROBERT W. ADAMS,

CIVIL ACTION - LAW

Plaintiff,

Number 1260 of 2008 C.D.

vs.

Type of Case: Civil Division

TERRY JO PETERS,

Defendant.

Filed on behalf of: Defendant

Counsel of Record for this Party:  
John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

ROBERT W. ADAMS, \* In the Court of Common Pleas of  
Plaintiff, \* Clearfield County, Pennsylvania  
\* Civil Action - Law  
\*  
\*  
vs. \*  
\*  
TERRY JO PETERS, \*  
\*  
Defendant. \* Number 1260 of 2008 C.D.

## ANSWER

AND NOW, comes the Defendant, Terry Jo Peters, by his attorneys, Dennison, Dennison & Harper, who file the following Answer to the Plaintiff's Amended Complaint:

### **Count I: Compensatory Damages**

1. The averments of Paragraph 1 of Plaintiff's Complaint are admitted.
2. The averments of Paragraph 2 of Plaintiff's Complaint are admitted.
3. With respect to the averments of Paragraph 3 of Plaintiff's Complaint, it is admitted that Defendant resides at the address set forth therein, and that the Plaintiff entered upon the Defendant's property. However, it is denied that the Defendant struck or otherwise injured the Plaintiff. In addition, the averments of Paragraph 3 of Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.
4. The averments of Paragraph 4 of Plaintiff's Complaint are admitted.
5. The averments of Paragraph 5 of Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

6. The averments of Paragraph 6 of Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

7. The averments of Paragraph 7 of Plaintiff's Complaint, including subparagraphs a. through g., are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

8. The averments of Paragraph 8 of Plaintiff's Complaint, including subparagraphs A. through J., are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

9. The averments of Paragraph 9 of Plaintiff's Complaint, including subparagraphs A. through F., are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

WHEREFORE, the Defendant demands judgment against the Plaintiff.

**Count II: Punitive Damages**

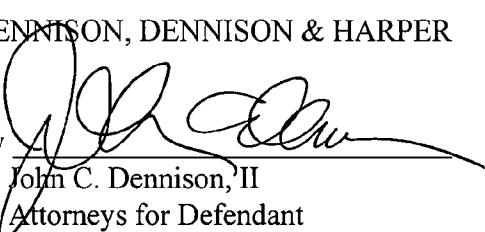
10. The averments of Paragraph 1 through 9 of this Answer are incorporated herein by reference thereto.

11. The averments of Paragraph 11 of Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

WHEREFORE, the Defendant demands judgment against the Plaintiff.

DENNISON, DENNISON & HARPER

By

  
John C. Dennison, II  
Attorneys for Defendant

I verify that the statements made in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I understand that false statements herein made are subject to the penalties of 18 Pa. C. S. Section 4904, relating to unsworn falsification to authorities.

Terry Jo Peters  
Terry Jo Peters

FILED

OCT 29 2008

William A. Shaw  
Prothonotary/Clerk of Courts

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

Robert W. Adams,  
Plaintiff,  
vs.  
Terry Jo Peters,  
Defendant.

\*  
\*  
\*  
\* No. 2008-1260-C.D.

5 **FILED** 2cc Atty  
93:48cm Sughrue  
JUL 01 2009

William A. Shaw  
Prothonotary/Clerk of Courts

\* **Type of Case:** Civil: Trespass

\* **Type of Pleading:** Certificate of Service

\* **Filed on Behalf of:** Plaintiff

\* **Counsel of Record for this Party:**

\* John Sughrue, Esquire  
\* Attorney I. D. No. 01037  
\* 225 East Market Street  
\* Clearfield, PA 16830  
\* Phone: (814) 765-1704  
\* Fax: (814) 765-6959

**\* Other Counsel of Record:**

\* John C. Dennison, II, Esquire  
\* Dennison, Dennison & Harper  
\* Attorney I.D. No. 29408  
\* 293 Main Street  
\* Brookville, PA 15825  
\* Phone: (814) 849-8316  
\* Fax: (814) 849-4656

\*\*\*

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

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
Terry Jo Peters, \*  
Defendant. \*

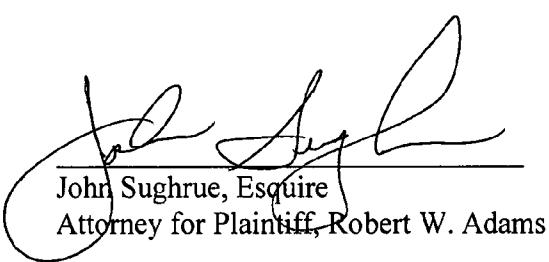
**CERTIFICATE OF SERVICE**

AND NOW, I do hereby certify that on July 1, 2009, I caused a true and correct copy of the PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS to be served on the following and in the manner indicated below:

**By United States Mail, First Class, Postage Prepaid**  
**Addressed as Follows:**

John C. Dennison, II, Esquire  
Dennison, Dennison & Harper  
293 Main Street  
Brookville, PA 15825

Date: July 1, 2009



John Sughrue, Esquire  
Attorney for Plaintiff, Robert W. Adams

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

ROBERT W. ADAMS,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1260 C. D.

vs.

TERRY JO PETERS,

Type of Case: Civil Division

Defendant.

Type of Pleading: Notice of  
Deposition of Plaintiff

Filed on behalf of: Defendant

Counsel of Record for this Party:  
John C. Dennison, II

Supreme Court Number: 29408

DENNISON, DENNISON & HARPER  
293 Main Street  
Brookville, Pennsylvania 15825  
(814) 849-8316

5 *BC* *BB* *FILED*  
2011 SEP 10 2010 NO C  
William A. Shaw  
Prothonotary/Clerk of Courts

ROBERT W. ADAMS,  
Plaintiff,  
vs.  
TERRY JO PETERS,  
Defendant.

\* In the Court of Common Pleas of  
\* Clearfield County, Pennsylvania  
\* Civil Action - Law  
\*  
\*  
\*  
\*  
\*  
\* No. 1260 - 2008 C.D.

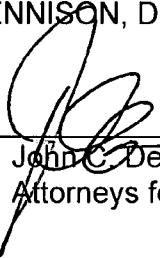
### NOTICE OF DEPOSITION

TO: ROBERT W. ADAMS  
c/o John Sughrue, Esquire  
225 East Market Street  
Clearfield, PA 16830

Take notice that the deposition of **ROBERT W. ADAMS** will be taken pursuant to the Pennsylvania Rules of Civil Procedure, as amended, before a Notary Public duly authorized by law to administer oaths, on Wednesday, September 15, 2010, at 10:30 a.m., at the law office of John Sughrue, 225 East Market Street, Clearfield, Pennsylvania 16830. The deposition will be taken upon oral examination for all purposes provided for and allowed by the Pennsylvania Rules of Civil Procedure.

DENNISON, DENNISON & HARPER

By

  
John C. Dennison, II  
Attorneys for Defendant

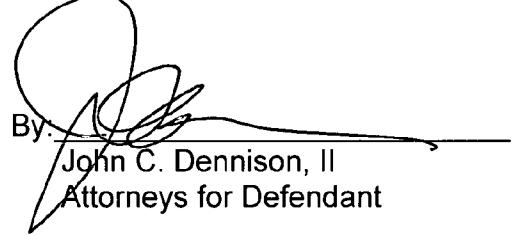
## CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September, 2010, a true and correct copy of the foregoing Notice of Deposition for Robert W. Adams, Plaintiff, was mailed by United States mail, first class, postage prepaid, addressed to the following:

John Sughrue, Esquire  
225 East Market Street  
Clearfield, PA 16830

Sargent's Court Reporting, Inc.  
210 Main Street  
Johnstown, PA 15901

DENNISON, DENNISON & HARPER

By: 

John C. Dennison, II  
Attorneys for Defendant

**FILED**

**SEP 10 2010**

William A. Straw  
Prothonotary/Clerk of Courts

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

Robert W. Adams,  
Plaintiff

vs.  
Terry Jo Peters,  
Defendant.

\*  
\*  
\*  
\*  
\*  
\* No. 2008-1260-C.D.

\* **Type of Case:** Civil

\*  
\*  
\*  
\*  
\*  
\* **Type of Pleading:** Praeclipe to Settle and  
Discontinue

\*  
\*  
\*  
\*  
\* **Filed on Behalf of:** Plaintiff

\*  
\* **Counsel of Record for this Party:**  
\* John Sughrue, Esquire  
\* Attorney I. D. No. 01037  
\* 225 East Market Street  
\* Clearfield, PA 16830  
\* Phone: (814) 765-1704  
\* Fax: (814) 765-6959

\*  
\* **Other Counsel of Record:**  
\* John C. Dennison, II, Esquire  
\* Dennison, Dennison & Harper  
\* Attorney I.D. No. 29408  
\* 293 Main Street  
\* Brookville, PA 15825  
\* Phone: (814) 849-8316  
\* Fax: (814) 849-4656

FILED  
03/20/2012 to Atty Sughrue  
MAR 21 2012  
william A. Shaw  
Prothonotary/Clerk of Courts

64

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

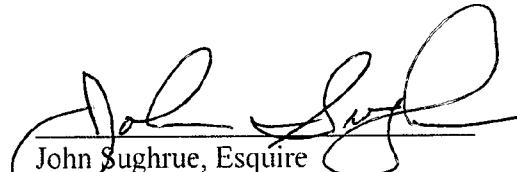
Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
Terry Jo Peters, \*  
Defendant. \*

**PRAECIPE TO SETTLE AND DISCONTINUE**

TO WILLIAM A. SHAW, PROTHONOTARY.

Kindly mark the above-captioned matter **settled**, discontinued, and terminated **with prejudice**, each party to pay their own costs. Please certify Bill of Costs and Certificate of Discontinuation to the undersigned, John Sughrue, Attorney for Plaintiff.

Date: March 21, 2012



John Sughrue, Esquire  
Attorney for Plaintiff

cc: John Dennison, Esquire

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

Robert W. Adams, \*  
Plaintiff, \*  
\*  
vs. \* No. 2008-1260-C.D.  
\*  
\*  
Terry Jo Peters, \*  
Defendant. \*  
\*

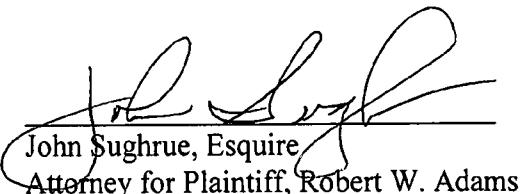
**CERTIFICATE OF SERVICE**

AND NOW, I do hereby certify that on March 21, 2012, I caused a true and correct copy of the PLAINTIFF'S PRAECIPE TO SETTLE AND DISCONTINUE to be served on the following and in the manner indicated below:

**By United States Mail, First Class, Postage Prepaid**  
**Addressed as Follows:**

John C. Dennison, II, Esquire  
Dennison, Dennison & Harper  
293 Main Street  
Brookville, PA 15825

Date: March 21, 2012



John Sughrue, Esquire  
Attorney for Plaintiff, Robert W. Adams

**FILED**

**MAR 21 2012**

*William A. Shaw*  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

**Robert W. Adams**

Vs. **No. 2008-01260-CD**  
**Terry Jo Peters**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on March 21, 2012, marked:

Settled, Discontinued, and Terminated with prejudice

Record costs in the sum of \$95.00 have been paid in full by John Sughrue, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 21st day of March A.D. 2012.



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William A. Shaw, Prothonotary

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

BILL OF COSTS

Robert W. Adams

Vs. 2008-01260-CD

Terry Jo Peters Total \$95.00

<u>Amount</u>	<u>Document</u>	<u>Paid By</u>
\$95.00	Complaint	John Sughrue, Esq.

Certified from the record this 21st day of March, 2012.

  
\_\_\_\_\_  
WILLIAM A. SHAW  
PROTHONOTARY