

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: Trespass

Type of Pleading: Praecipe for Writ of Summons

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 3 CC & 3 writs
012:40 PM to Atty Sughrue
JUL 10 2008 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.

Terry Jo Peters,

Defendant.

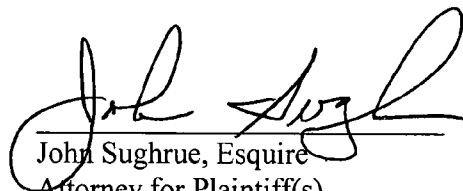
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No. 2008-_____-C.D.

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

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

SUMMONS

Robert W. Adams

Vs.

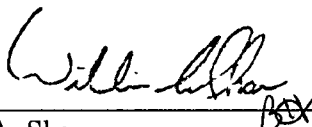
NO.: 2008-01260-CD

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

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 / Defendant

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

ADDRESS SERVED 503 Hollow Rd, Curwensville, 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. Morgillo
Deputy Signature

Dominic L. Morgillo
Print Deputy Name

FILED

013:2780
JUL 18 2008

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT W. ADAMS,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

CIVIL ACTION - LAW

Number 1260 of 2008, C. D.

Type of Case: Civil Division

Type of Pleading: Appearance

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/jc:4687
AUG 21 2008 @

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

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* Number 1260 of 2008, C. D.

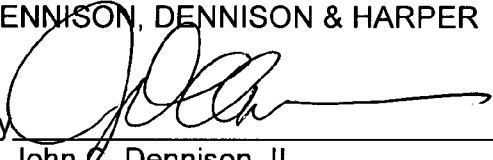
APPEARANCE

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,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

CIVIL ACTION - LAW

Number 1260 of 2008, C. D.

Type of Case: Civil Division

Type of Pleading: Praecipe for Rule
To File Complaint

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 *ICC#1 Rule*
10:46 AM
AUG 21 2008 *to Atty*
Dennison
William A. Shaw
Prothonotary/Clerk of Courts *(610)*

ROBERT W. ADAMS,
Plaintiff,

vs.

TERRY JO PETERS,
Defendant.

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

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* Number 1260 of 2008, C. D.

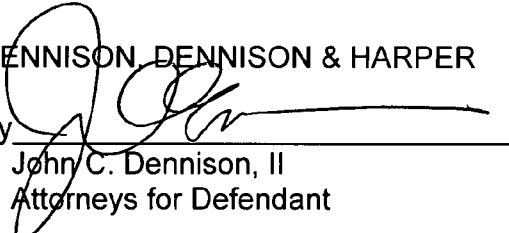
PRAECIPE FOR RULE TO FILE COMPLAINT

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

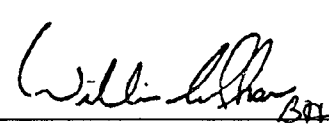
By


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,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

CIVIL ACTION - LAW

Number 1260 of 2008, C. D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

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 *no*
m 10:30 AM
AUG 26 2008
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

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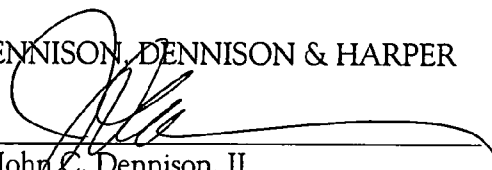
* Number 1260 - 2008 C. D.

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 25th 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 23 2009

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: 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

SEP 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

302
013:53/011 Atty Sughrue

CR

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.

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.

Terry Jo Peters,

Defendant.

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No. 2008-1260-C.D.

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.

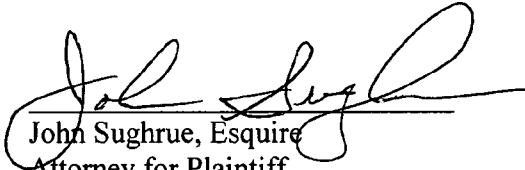
Count II: Punitive Damages

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, Plaintiff

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.

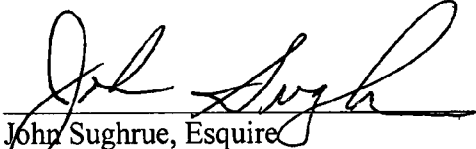
CERTIFICATE OF SERVICE

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
09/30/08 LM
OCT 13 2008
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

FILED

OCT 13 2008

William A. Shaw
Prothonotary/Clerk of Courts

FILED

OCT 29 2008

§ m / 10:30 / c
William A. Shaw
Prothonotary/Clerk of Courts

No 4 / (610

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: Answer

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,
Plaintiff,

vs.

TERRY JO PETERS,
Defendant.

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

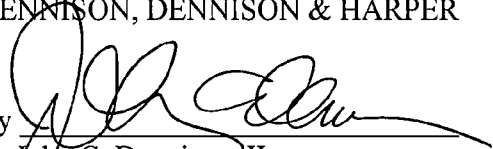
Count II: Punitive Damages

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

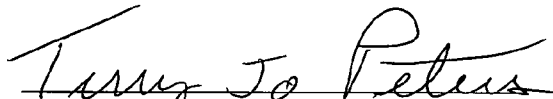
11. The averments of Paragraph 11 of Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e) and no further answer is required thereto.

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

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.

2cc Ath
FILED
9/3/482m
Sughrue
JUL 01 2009
(Signature)

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.	*	
	*	

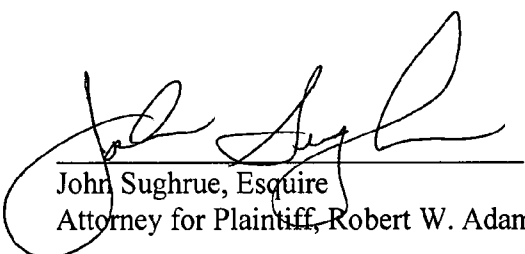
CERTIFICATE OF SERVICE

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,

Plaintiff,

vs.

TERRY JO PETERS,

Defendant.

CIVIL ACTION - LAW

Number 2008 - 1260 C. D.

Type of Case: Civil Division

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 FILED 10
SEP 10 2010
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

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* 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

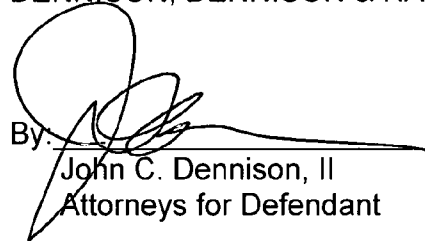
CERTIFICATE OF SERVICE

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. 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.

Type of Case: Civil

Type of Pleading: Praecept 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

01/31/2012
MAR 21 2012

William A. Shaw
Prothonotary/Clerk of Courts

66

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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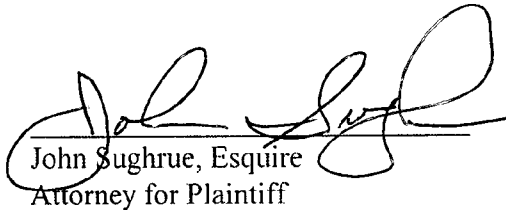
No. 2008-1260-C.D.

PRAECIPE TO SETTLE AND DISCONTINUE

TO WILLIAM A. SHAW, PROTHONOTARY.

Kindly mark the above-captioned matter **settled**, discontinued, and terminated **with pre-judice**, 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.	*	
		*	

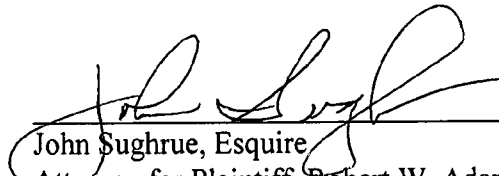
CERTIFICATE OF SERVICE

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.



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

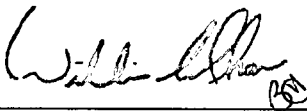
Total \$95.00

Amount
\$95.00

Document
Complaint

Paid By
John Sughrue, Esq.

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



WILLIAM A. SHAW
PROTHONOTARY