

08-1586-CD
Robert Kline vs Christopher Stott al

FILED

AUG 25 2008

013:25/cw

William A. Shaw
Prothonotary/Clerk of Courts

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w/4 warrs to
ATTY

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.

Defendants,

*

CIVIL DIVISION

*

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Number 2008-1586-CV

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Type of Pleading: PRAECIPE
FOR SUMMONS OF CIVIL ACTION

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Filed on behalf of:

ROBERT J. KLINE, JR.
Plaintiff

*

*

Counsel of Record:
JAMES D. DENNISON, ESQUIRE

*

Supreme Court Number: 37589

*

*

DENNISON LAW OFFICES, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 18525
(814) 849-1237
(814) 849-1242 FAX #

ROBERT J. KLINE, JR., * In the Court of Common Pleas of
Plaintiff, * Clearfield County, Pennsylvania
* CIVIL DIVISION
*
* vs. *
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CHRISTOPHER STOTT, individually, *
and **HRI, INC.**, and **DIANA RICE**, *
individually and as an agent or employee *
of **HRI, INC.** *
Defendants. * Number _____

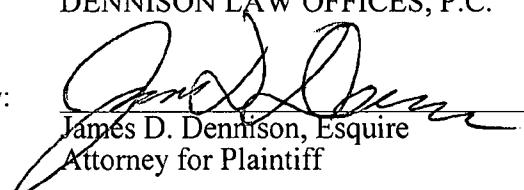
PRAECLPICE FOR SUMMONS IN CIVIL ACTION

TO WILLIAM A. SHAW, PROTHONOTARY:

Issue a Summons in Civil Action in which **CHRISTOPHER STOTT**, individually, and **HRI, INC.** and **DIANA RICE**, individually and as an agent or employee of **HRI, Inc.**, are the Defendants in the above captioned matter.

DENNISON LAW OFFICES, P.C.

By:


James D. Dennison, Esquire
Attorney for Plaintiff

Dated: August 25, 2008

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and **HRI, INC.**, and **DIANA RICE**,
individually and as an agent or employee
of **HRI, INC.**

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* CIVIL DIVISION

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Prothonotary/Clerk of Courts
William A. Shaw

AUG 25 2008

FILED

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

SUMMONS

Robert J. Kline Jr.

Vs.

NO.: 2008-01586-CD

**Christopher Stott, individually and
HRI, Inc., and Diana Rice, individually
and as a agent or employee of HRI, INC.**

**TO: CHRISTOPHER STOTT
HRI, INC.
DIANA RICE**

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: 8/25/2008

William A. Shaw
Prothonotary

Issuing Attorney:

James D. Dennison
316 Main Street
Brookville, PA 15825

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1586-CD

ROBERT J. KLINE JR.

vs

SERVICE # 2 OF 3

CHRISTOPHER STOTT, ind & HRI, Inc., and Diana Rice, individually and as a agent
or employee of HRI, INC.

SUMMONS

SERVE BY: 09/24/2008 HEARING: PAGE: 104573

DEFENDANT: HRI, INC.
ADDRESS: PO BOX 402, 88 BARRETT ROAD
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/PIC

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

SHERIFF'S RETURN

NOW, 9/4/08 AT 226 AM/PM SERVED THE WITHIN

SUMMONS ON HRI, INC., DEFENDANT

BY HANDING TO Kevin Etters Supervisor

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

ADDRESS SERVED 88 Barrett rd Clearfield Pa

NOW _____ AT _____ AM / PM POSTED THE WITHIN

SUMMONS FOR HRI, INC.

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO HRI, INC.

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy [Signature]
Deputy Signature

S. Hunter
Print Deputy Name

FILED

03:18 PM
SEP 04 2008

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD
COUNTY, PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 1586 of 2008, C. D.

vs.

CHRISTOPHER STOTT,
individually; and HRI, INC.; and
DIANA RICE, individually and as an
agent or employee of HRI, INC.,
Defendants.

Type of Case: Civil Division

Type of Pleading: Appearance

Filed on Behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

3
FILED No. CL.
mild:01cm
OCT 20 2008
William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually;
and HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

* Civil Action - Law

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* Number 1586 - 2008 C. D.

APPEARANCE

TO THE PROTHONOTARY:

Enter our Appearance on behalf of Christopher Stott, one of the Defendants in the
above captioned matter.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

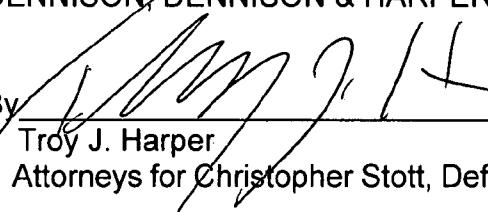
Attorneys for Christopher Stott, Defendant

I certify that a true and correct copy of the foregoing Appearance was served on the Plaintiff on the 17th day of October, 2008, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices
395 Main Street, Suite A
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Christopher Stott, Defendant

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 1586 of 2008, C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,
Defendants

Type of Pleading: Praeclipe for Rule to
File Complaint

Filed on Behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

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01/15/09
NOV 26 2008
LM
William A. Shaw
Prothonotary/Clerk of Courts
ICCA Rule
to Atty Harper

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,

Defendants.

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

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* Number 1586 - 2008 C. D.

PRAECIPE FOR RULE TO FILE COMPLAINT

TO THE 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

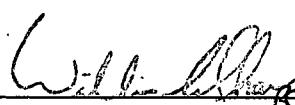
By

Troy J. Harper
Attorneys for Christopher Stott,
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

11/26/08

Dated:

I certify that a true and correct copy of the foregoing Praeclipe for Rule to File
Complaint was served on the 25th day of November, 2008, by United States Mail, First
Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
316 Main Street
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By



Troy J. Harper
Attorneys for Christopher Stott,
Defendant

FILED

NOV 26 2008

William A. Shaw
Prothonotary/Clerk of Courts

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11/18/08 30
William A. Shaw
Prothonotary/Clerk of Courts
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N. C/C

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 1586 of 2008, C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,
Defendants

Type of Pleading: Certificate of Service

Filed on Behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,

Defendants.

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

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* Number 1586 - 2008 C. D.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Rule to File Complaint was served on the Plaintiff, Robert J. Kline, Jr., on the 11th day of December, 2008, by United States Mail, First Class, postage prepaid, addressed to his attorney, James D. Dennison, Esq., 316 Main Street, Brookville, PA 15825.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Christopher Stott,
Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104573
NO: 08-1586-CD
SERVICE # 3 OF 3
SUMMONS

PLAINTIFF: ROBERT J. KLINE JR.

vs.

DEFENDANT: CHRISTOPHER STOTT, ind & HRI, Inc., and Diana Rice, individually and as a agent or employee of HRI, INC.

SHERIFF RETURN

NOW, September 02, 2008, SHERIFF OF CENTRE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN SUMMONS ON DIANA RICE, ind. & as an agent or employee of HRI, INC..

NOW, September 11, 2008 AT 8:11 AM SERVED THE WITHIN SUMMONS ON DIANA RICE, ind. & as an agent or employee of HRI, INC., DEFENDANT. THE RETURN OF CENTRE COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

S
FILED
03:25 LM
JAN 08 2009
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104573
NO: 08-1586-CD
SERVICES 3
SUMMONS

PLAINTIFF: ROBERT J. KLINE JR.

vs.

DEFENDANT: CHRISTOPHER STOTT, ind & HRI, Inc., and Diana Rice, individually and as a agent or employee of HRI, INC.

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	DENNISON	12707	30.00
SHERIFF HAWKINS	DENNISON	12707	38.84
CENTRE CO.	DENNISON	12708	45.50

Sworn to Before Me This

So Answers,

____ Day of _____ 2009

*Chester A. Hawkins
by Marilyn*

SHERIFF'S OFFICE
CENTRE COUNTY

Rm 101 Court House, Bellefonte, Pennsylvania, 16823 (814) 355-6803

SHERIFF SERVICE PROCESS RECEIPT, AND AFFIDAVIT OF RETURN		INSTRUCTIONS FOR SERVICE OF PROCESS: You must file one instruction sheet for each defendant, please type or print legibly. Do Not detach any copies.
---	--	--

1. Plaintiff(s) Robert J Kline Jr.	2. Case Number 08-1586-CD
3. Defendant(s) Christopher Stott et al	4. Type of Writ or Complaint: Summons 502272

SERVE → AT	5. Name of Individual, Company, Corporation, Etc., to Serve or Description of Property to be Levied, Attached or Sold. Diana Rice
	6. Address (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code) 1111Cherry St., Philipsburg, PA 16866

7. Indicate unusual service: <input type="checkbox"/> Reg Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Deputize <input type="checkbox"/> Post <input type="checkbox"/> Other

Now, _____ 20_____. I, SHERIFF OF CENTRE COUNTY, PA., do hereby depose the Sheriff of _____ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff. _____
Sheriff of Centre County

8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE

NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. Print/Type Name and Address of Attorney/Originator DENNISON & DENNISON 316MAIN ST.	10. Telephone Number 849-8316	11. Date
	12. Signature	

BROOKVILLE, PA

SPACE BELOW FOR USE OF SHERIFF ONLY - DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above. <input type="checkbox"/>	SIGNATURE of Authorized CCSD Deputy of Clerk and Title	14. Date Filed	15. Expiration/Hearing Date
---	--	----------------	-----------------------------

TO BE COMPLETED BY SHERIFF

16. Served and made known to Diana Rice	on the 11 day of September	
20 2008, at 8:11 AM	o'clock, m., at 1111Cherry St., Philipsburg, PA 16866	County of Centre
Commonwealth of Pennsylvania, in the manner described below:		
<input type="checkbox"/> Defendant(s) personally served. <input type="checkbox"/> Adult family member with whom said Defendant(s) resides(s). Relationship is defendant <input type="checkbox"/> Adult in charge of Defendant's residence. <input type="checkbox"/> Manager/Clerk of place of lodging in which Defendant(s) resides(s). <input type="checkbox"/> Agent or person in charge of Defendant's office or usual place of business. and officer of said Defendant company. Other		

On the _____ day of _____, 20_____, at _____ o'clock, _____ M.

Defendant not found because:

<input type="checkbox"/> Moved	<input type="checkbox"/> Unknown	<input type="checkbox"/> No Answer	<input type="checkbox"/> Vacant	<input type="checkbox"/> Other _____
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Remarks:

Advance Costs 75.00	Docket 9.00	Service 9.00	Sur Charge 0.00	Affidavit 2.50	Mileage 25.00	Postage	Misc.	Total Costs 45.50	Costs Due or Refund (29.50)
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17. AFFIRMED and subscribed to before me this 11	So Answer.	19. Date
--	------------	----------

20. day of Sept 20 08	Signature of Dep. Sheriff	19. Date 9/11/08
22. Signature of Sheriff	22. Date	

Notary Public Corinna H. Peters, Notary Public My Commission Expires Centre County	SHERIFF OF CENTRE COUNTY	
--	--------------------------	--

24. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OR AUTHORIZED AUTHORITY AND TITLE 38 Pennsylvania Asst. Dist. Atty. 38	25. Date Received
--	-------------------



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641
FAX. (814) 765-5915

ROBERT SNYDER
CHIEF DEPUTY
MARILYN HAMM
DEPT. CLERK

CYNTHIA AUGHENBAUGH
OFFICE MANAGER
KAREN BAUGHMAN
CLERK TYPIST

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 104573

TERM & NO. 08-1586-CD

ROBERT J. KLINE JR.

SUMMONS

vs.

CHRISTOPHER STOTT, ind & HRI, Inc., and Diana Rice, individually and as a agent
or employee of HRI, INC.

SERVE BY: 09/24/08
COURT DATE:

MAKE REFUND PAYABLE TO DENNISON LAW OFFICE, P.C.

SERVE: DIANA RICE, ind. & as an agent or employee of HRI, INC.

ADDRESS: 1111 CHERRY ST., PHILIPSBURG, PA 16866

Know all men by these presents; that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby depelize the SHERIFF OF CENTRE COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, September 02, 2008.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

FILED

JAN 08 2009

William A. Shaw
Prothonotary/Clerk of Courts

FILED

FEB 10 2009

10:30 AM

William A. Shaw
Prothonotary/Clerk of Courts

NO 4/2 610

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

CIVIL ACTION - LAW

Number 2008 - 01586 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

*

* Civil Division

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* Number 2008 - 01586 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff were served on the _____ day of February, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esquire
DENNISON LAW OFFICES, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

and one certified copy was served on the following, in the same manner:

HRI, Inc.
1750 West College Avenue
State College, PA 16823
(Defendant)

Diana Rice
1111 Cherry Street
Philipsburg, PA 16866
(Defendant)

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

FILED

FEB 10 2009

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
Plaintiff, : Docket No. 2008-01586 C.D.
vs. :
CHRISTOPHER STOTT, individually, : Type of Case:
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., : Civil Action
Defendants. : Type of Pleading:
: Praecept for Entry of
: Appearance
: Filed on Behalf of Defendant HRI
: and Diana Rice
: Counsel of Record for This Party
: David B. Consiglio, Esquire
: Campbell, Miller, Williams,
: Benson, Etter & Consiglio, Inc.
: 720 S. Atherton Street
: State College, PA 16801
: (814) 234-1500

FILED NO CC
M 10:48 AM
FEB 13 2009
S William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR.,

Plaintiff, : Docket No. 2008-01586 C.D.

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

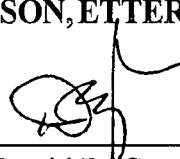
PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter the appearance of the undersigned counsel on behalf of Defendant, HRI,
Inc. and Defendant, Diana Rice.

Respectfully submitted,

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: February 12, 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
Plaintiff, : Docket No. 2008-01586 C.D.
vs. :
CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
Defendants. :
:

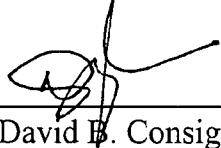
CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc., do hereby certify that on this 12th day of February, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER, & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR., :
Plaintiff, : Docket No. 2008-01586 C.D.
vs. :
CHRISTOPHER STOTT, individually, : Type of Case:
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
Defendants. :
Defendants HRI, Inc. and :
Diana Rice's Answer, New :
Matter, and Crossclaim :
Filed on Behalf of Defendants HRI :
and Diana Rice :
Counsel of Record for This Party :
David B. Consiglio, Esquire :
Campbell, Miller, Williams, :
Benson, Etter & Consiglio, Inc. :
720 S. Atherton Street :
State College, PA 16801 :
(814) 234-1500 :

FILED
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FEB 20 2009
cc
S

William A. Shaw
Prothonotary/Clerk of Courts

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR.,	:	
	:	
Plaintiff,	:	Docket No. 2008-01586 C.D.
	:	
vs.	:	
	:	
CHRISTOPHER STOTT, individually,	:	
and HRI, INC., and DIANA RICE,	:	
individually and as an agent or employee of	:	
HRI, INC.,	:	
	:	
Defendants.	:	

NOTICE TO PLEAD

TO: Robert J. Kline, Jr.
c/o James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Christopher Stott
c/o Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

You are hereby notified to file a written response to the enclosed New Matter and Crossclaim within twenty (20) days from service hereof or a default judgment may be entered against you.

CAMPBELL, MILLER, WILLIAMS, BENSON, ETTER & CONSIGLIO, INC.

By: David B. Consiglio
David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: February 19, 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
: Plaintiff, : Docket No. 2008-01586 C.D.
: :
vs. :
: :
CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
: Defendants. :
:

**DEFENDANTS HRI AND DIANA RICE'S ANSWER, NEW MATTER,
AND CROSSCLAIM**

ANSWER

AND NOW, come Defendants, HRI, Inc. and Diana Rice, by and through their undersigned counsel, and file this Answer with New Matter, and Crossclaim and state in support thereof as follows:

1. Admitted.
2. Admitted upon information and belief.
3. Admitted.
4. Admitted.
5. After reasonable investigation, Answering Defendants lack sufficient information to form a belief as to the truth or falsity of the matters set forth in Paragraph 5 of the Complaint and the allegations therein are therefore specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).

6. After reasonable investigation, Answering Defendants lack sufficient information to form a belief as to the truth or falsity of the matters set forth in Paragraph 6 of the Complaint and the allegations therein are therefore specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
7. Admitted.
8. Each and every allegation set forth in Paragraph 8 of the Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
9. After reasonable investigation, Answering Defendants lack sufficient information to form a belief as to the truth or falsity of the matters set forth in Paragraph 9 of the Complaint and the allegations therein are therefore specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
10. The allegations set forth in Paragraph 10 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability.
11. The allegations set forth in Paragraph 11, and its subparts, of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering

Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability.

12. The allegation set forth in Paragraph 12 of the Complaint is a conclusion of law to which no response is required. To the extent that a response is deemed required, said allegation is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).

COUNT I

13. Paragraphs 1 through 12 hereof are incorporated herein by reference as if set forth fully.
14. The allegations set forth in Paragraph 14 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability. By way of further response, Answering Defendants specifically deny and deny generally the injuries alleged by Plaintiff; strict proof is demanded.

15. The allegations set forth in Paragraph 15 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability. By way of further response, Answering Defendants specifically deny and deny generally the injuries alleged by Plaintiff; strict proof is demanded.
16. The allegations set forth in Paragraph 16 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability. By way of further response, Answering Defendants specifically deny and deny generally the injuries alleged by Plaintiff; strict proof is demanded.
17. The allegations set forth in Paragraph 17 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the

circumstances at all times and said Answering Defendants deny all liability.

By way of further response, Answering Defendants specifically deny and deny generally the injuries alleged by Plaintiff; strict proof is demanded.

18. The allegations set forth in Paragraph 18 of the Complaint are directed to parties other than Answering Defendants and therefore said allegations require no response from Answering Defendants. To the extent that a response is deemed required by Answering Defendants, Answering Defendants aver that Answering Defendants acted reasonably and prudently under the circumstances at all times and said Answering Defendants deny all liability.

By way of further response, Answering Defendants specifically deny and deny generally the injuries alleged by Plaintiff; strict proof is demanded.

WHEREFORE, Defendants HRI and Diana Rice demand judgment in their favor and against Plaintiff, for the costs of this action, and for such other and further relief as the Court deems just and proper.

COUNT II

19. Paragraphs 1 through 18 hereof are incorporated herein by reference as if set forth fully.
20. Each and every allegation set forth in Paragraph 20 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).

21. Each and every allegation set forth in Paragraph 21 of Plaintiff's Complaint and each of its subparts is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
22. Each and every allegation set forth in Paragraph 22 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
23. Each and every allegation set forth in Paragraph 23 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
24. Each and every allegation set forth in Paragraph 24 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
25. Each and every allegation set forth in Paragraph 25 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
26. Each and every allegation set forth in Paragraph 26 of Plaintiff's Complaint is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).

WHEREFORE, Defendants HRI and Diana Rice demand judgment in their favor and against Plaintiff, for the costs of this action, and for such other and further relief as the Court deems just and proper.

NEW MATTER

27. Paragraphs 1 through 26 hereof are incorporated herein by reference as if set forth fully.

28. The Complaint fails to state a claim upon which relief can be granted against Defendants HRI, Inc. and/or Diana Rice.
29. Plaintiff's claims against Defendants HRI, Inc. and Diana Rice are barred, in whole or in part, by the following:
 - A. Pennsylvania Comparative Negligence Act;
 - B. Plaintiff's comparative negligence;
 - C. Plaintiff's contributory negligence;
 - D. The doctrine of the assumption of risk; and/or
 - E. The applicable statute of limitations or repose.
30. In the event that it is determined that Plaintiff sustained any harm or injuries as alleged in his Complaint, which is denied, it is averred that said injuries and/or damages were directly and proximately caused by Plaintiff's own negligent conduct.
31. In the event that it is determined that Plaintiff sustained any harm or injuries as alleged in his Complaint, which is denied, it is averred that Plaintiff failed to proceed in a reasonable and prudent fashion and failed to maintain a proper lookout under the circumstances then and there existing.
32. Defendants HRI and Diana Rice aver that to the extent that Plaintiff sustained any injuries or harm as alleged in his Complaint, all of which is denied, then said injuries and/or harm was directly, proximately, and solely caused by the negligence of others over whom Defendants HRI and Diana Rice had neither the opportunity nor duty to control.

33. Defendants HRI and Diana Rice aver that Plaintiff's claims are subject to, limited by, and/or barred by insurance coverage elections, including, but not limited to, elections for applicable tort coverage arising out of the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.
34. Defendants HRI and Diana Rice aver that Plaintiff's claims are subject to, barred by, and/or limited by the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.
35. Defendants HRI and Diana Rice aver that Plaintiff has not sustained any serious injury as required by the Pennsylvania Motor Vehicle Financial Responsibility Law sufficient to give rise to the causes of action set forth in the Complaint.
36. The causal negligence of Plaintiff was greater than the negligence on the part of any of the named Defendants, all such alleged negligence against HRI and Rice being specifically denied.

WHEREFORE, Defendants HRI and Diana Rice demand judgment in their favor and against Plaintiff, for the costs of this action, and for such other and further relief as the Court deems just and proper.

CROSS CLAIM
Defendants HRI, Inc. and Diana v. Defendant Stott

37. Paragraphs 1 through 36 hereof are incorporated herein by reference as if set forth fully.

38. The allegations contained in Plaintiff's Complaint against Defendant Stott are incorporated herein by reference as if set forth fully without admitting or denying same.
39. The responses contained herein in the Answer and New Matter of Defendants HRI, Inc. and Rice to Plaintiff's Complaint are incorporated herein by reference as if set forth fully.
40. Liability on the part of Defendants HRI and Rice, and each of them, is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e).
41. If the allegations contained in Plaintiff's Complaint against Defendant Stott are determined to be true, then the injuries and damages complained of were caused in whole and solely by Defendant Stott, to the exclusion of Defendants HRI and Rice.
42. Defendant Stott is herein joined as a cross-Defendant to protect Defendants HRI and Rice's right of indemnity and contribution and Defendants HRI and Rice hereby aver that Defendant Stott is alone liable to Plaintiff or, in the alternative, is liable over to Defendants HRI and Rice, or, in the alternative, is jointly and severally liable to Defendants HRI and Rice, the existence of any liability on the part of Defendants HRI and Rice being expressly, specifically, and generally denied.

WHEREFORE, Defendants HRI and Rice deny that they, or either of them, is liable to Plaintiff and/or to any other party in any amount or in any manner whatsoever and requests that Plaintiff's Complaint be dismissed with prejudice and that judgment be entered in favor of Defendants HRI and Rice and against all other parties, together with costs and such further as the Court may deem just and proper.

Respectfully submitted,

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.**

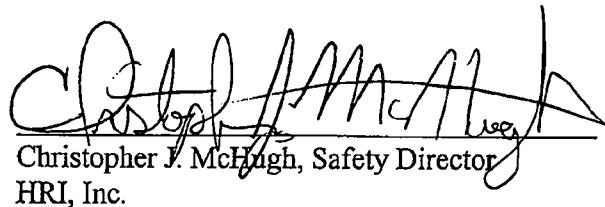
By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: February 19, 2009

VERIFICATION

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



Christopher J. McHugh, Safety Director
HRI, Inc.

Dated: 2-12-09

VERIFICATION

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



Diana Rice

Dated: 2-12-09

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
Plaintiff, : Docket No. 2008-01586 C.D.
vs. :
CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
Defendants. :

CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc., do hereby certify that on this 19th day of February, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER, & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and **HRI, INC.**, and **DIANA RICE**,
individually and as an agent or employee
of **HRI, INC.**

Defendants,

* CIVIL DIVISION

*

* Number 2008-01586 C.D.

*

* Type of Pleading: COMPLAINT

*

*

*

*

*

* Filed on behalf of:

* ROBERT J. KLINE, JR.
* Plaintiff

*

* Counsel of Record:

* JAMES D. DENNISON, ESQUIRE

*

* Supreme Court Number: 37589

*

* DENNISON LAW OFFICES, P.C.

* Landmark Square

* 395 Main Street, Suite A

* Brookville, PA 18525

* (814) 849-1237

* (814) 849-1242 FAX #

FILED 2cc
M 19 2009 Atty. Dennison
FEB 23 2009
S William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,	*	In the Court of Common Pleas of
	*	Clearfield County, Pennsylvania
Plaintiff,	*	CIVIL DIVISION
	*	
vs.	*	
	*	
CHRISTOPHER STOTT , individually,	*	
and HRI, INC. , and DIANA RICE ,	*	
individually and as an agent or employee	*	
of HRI, INC.	*	
Defendants.	*	Number 2008-01586 C.D.

NOTICE TO DEFEND

TO CHRISTOPHER STOTT, HRI, INC. and DIANA RICE:

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.

Laurel Legal Services, Inc.
18 Western Avenue, Suite I
Brookville, Pennsylvania 15825
(814) 849-3044

COMPLAINT AND DEMAND FOR TRIAL BY JURY

The Plaintiff, Robert A. Kline, Jr., by and through his attorney, James D. Dennison, Esquire, hereby files this Complaint against the Defendants upon the cause of action hereinafter set forth:

1. Plaintiff Robert A. Kline, Jr. Is and individual of full age and sui juris residing in Clearfield County, Pennsylvania and having a post office address of 1348 Greenville Pike, Grampian PA 16838.

2. Defendant Christopher L. Stott is an adult individual residing in Clearfield County and whose last known address was 611 Arnold Avenue, Clearfield, PA 16830.

3. Defendant Diana Rice is an adult individual Residing in Centre County, Pennsylvania, whose last known address was 1111 Cherry Street, Philipsburg, PA 16866.

4. Defendant HRI, Inc. is a Pennsylvania corporation with offices situate at 1750 West College Ave., State College, PA 16823

5. On or about August 25, 2006, at approximately 12:30 PM, Plaintiff Robert A. Kline, Jr. was operating his 1990 Oldsmobile Ciera in a southerly direction on South Second

Street near the intersection with Park Avenue in the Borough of Clearfield, Clearfield County, Pennsylvania.

6. At the same time and place, the Defendant Christopher L. Stott, was operating a vehicle southbound on South Second Street directly behind the vehicle operated by the Plaintiff.

7. At the same time and place, the Defendant Diana Rice, while working as an employee of the Defendant HRI, Inc., was directing traffic as a flag person at a construction site of her employer, HRI, Inc..

8. Suddenly, without adequate warning, the Defendant Diana Rice raised her flag signaling to the Plaintiff Robert A. Kline, Jr. that he needed to stop his vehicle.

9. After bringing his vehicle to a complete stop, the vehicle operated by the Plaintiff Robert A. Kline Jr. was struck in the rear by the vehicle operated by the Defendant Christopher L. Stott, causing damage to the vehicle owned and operated by the Plaintiff Robert A. Kline, Jr., and causing physical injury to the Plaintiff.

10. At such time and place as aforementioned, the Defendant Christopher L. Stott did so operate his vehicle in a negligent, careless, and reckless manner in that he caused the front of his vehicle to collide violently with the rear of the vehicle operated by Plaintiff Robert A. Kline, Jr., while Plaintiff Robert A. Kline, Jr. was operating his vehicle in a lawful manner in the southbound lane of South Second Street.

11. The negligence, carelessness, and recklessness of the Defendant Christopher L. Stott consisted of the following:

- (a) Failing to maintain his vehicle under proper and adequate control at the time;
- (b) Failing to keep a proper look out for the vehicle being operated by Plaintiff Robert A. Kline, Jr., which vehicle was traveling southbound on South Second Street;
- (c) Operating his vehicle in such a manner as to cause it to collide with the rear of the vehicle operated by Plaintiff Robert A. Kline, Jr., which had come to a complete stop on

South Second Street;

(d) Operating his vehicle without due regard for the rights, safety, well-being and position of the Plaintiff under the circumstances;

(e) Failing to keep a careful and diligent watch on the road;

(f) Operating his vehicle in a negligent, careless and reckless manner by failing to stop his vehicle before colliding with the rear of the vehicle operated by Plaintiff Robert A. Kline, Jr.;

(g) Traveling at an unsafe speed;

(h) Traveling at a speed that did not permit him to bring his vehicle to a stop within the assured clear distance ahead;

(i) Operating his vehicle at a high and excessive rate of speed under the circumstances;

12. At all times material thereto, Plaintiff Robert A. Kline, Jr. acted with due care and was not contributorily negligent.

COUNT I

PLAINTIFF ROBERT A. KLINE, JR.

vs.

DEFENDANT CHRISTOPHER L. STOTT

13. Plaintiff Robert A. Kline, Jr. incorporates by reference paragraphs 1 through 12 of this Complaint as if set forth at length herein.

14. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. sustained injuries including, but not limited to: injury to his neck and left shoulder and trapezius muscle, muscle spasms, subacromial

impingement and left shoulder slap lesion with fraying of anterior and inferior labrum; and general bruises and contusions.

15. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has suffered, and will suffer in the future, great bodily pain and suffering, as well as mental anxiety and nervousness to his great detriment, damage and loss.

16. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has been prevented from attending to his usual duties, to his great detriment, damage and loss.

17. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has been forced to incur expenses for medicine and medical treatment and may be forced to expend additional sums in the future, to his great detriment and financial loss.

18. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has suffered a loss of earnings and/or earning capacity, including future earnings.

WHEREFORE, Plaintiff Robert A. Kline, Jr. demands judgment against the Defendant Christopher L. Stott in an amount in excess of \$25,000.00, plus interest and costs, and for such other relief as the court may deem appropriate.

COUNT II
PLAINTIFF ROBERT A. KLINE, JR.
VS.
DEFENDANT DIANA RICE AND HRI, INC.

19. Plaintiff Robert A. Kline, Jr. incorporates by reference paragraphs 1 through 18 of this Complaint as if set forth at length herein.

20. At such time and place as aforementioned, the Defendant Diana Rice, individually and as an employee of the Defendant HRI, Inc., and on behalf of and at the direction of HRI, Inc., performed her duties as flag person in a negligent, careless, and reckless manner in that she failed to provide the Plaintiff with sufficient and adequate warning that would allow the Plaintiff to bring his vehicle to a stop in a reasonably safe manner which ultimately caused the vehicle operated by the Defendant Christopher L. Stott to collide violently with the rear of the vehicle operated by Plaintiff Robert A. Kline, Jr..

21. The negligence, carelessness, and recklessness of the Defendant Diana Rice, individually and as an employee of HRI, Inc., consisted of the following:

- (a) Failing to perform her duties as flag person in a reasonable and safe manner;
- (b) Failing to keep a proper look out for the vehicle being operated by Plaintiff Robert A. Kline, Jr., which vehicle was traveling in a lawful manner southbound on South Second Street;
- (c) Failing to keep a proper look out for the vehicle being operated by Plaintiff Robert A. Kline, Jr., which vehicle was traveling in a lawful manner southbound on South Second Street and the vehicle that was following him operated by the Defendant, Christopher L Stott;

(d) Performing her duties as flag person in such a manner as to cause the collision of the vehicle operated by the Defendant Christopher L. Stott with the rear of the vehicle operated by Plaintiff Robert A. Kline, Jr.;

(e) Performing her duties as flag person without due regard for the rights, safety, well-being, position and speed of the motor vehicle operated by the Plaintiff and the motor vehicle operated by the Defendant Christopher Stott;

(f) Failing to keep a careful and diligent watch of the flow of traffic on the road before signaling the traffic to stop;

22. As a direct and proximate result of the collision and the Defendant's negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. sustained injuries including, but not limited to: injury to his neck and left shoulder and trapezius muscle, muscle spasms, subacromial impingement and left shoulder slap lesion with fraying of anterior and inferior labrum; and general bruises and contusions.

23. As a direct and proximate result of the collision and the Defendants' negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has suffered, and will suffer in the future, great bodily pain and suffering, as well as mental anxiety and nervousness to his great detriment, damage and loss.

24. As a direct and proximate result of the collision and the Defendants' negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has been prevented from attending to his usual duties, to his great detriment, damage and loss.

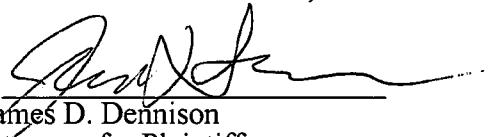
25. As a direct and proximate result of the collision and the Defendants' negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has been forced to incur expenses for medicine and medical treatment and may be forced to expend additional sums in the future, to his great detriment and financial loss.

26. As a direct and proximate result of the collision and the Defendants' negligent and reckless conduct, Plaintiff Robert A. Kline, Jr. has suffered a loss of earnings and/or earning capacity.

WHEREFORE, Plaintiff Robert A. Kline, Jr. demands judgment against the Defendant Diana Rice, individually and as an employee of HRI, Inc., and HRI, Inc., jointly and severally, in an amount in excess of \$25,000.00, plus interest and costs, and for such other relief as the court may deem appropriate.

DENNISON LAW OFFICES, P.C.

January 22, 2009

By: 
James D. Dennison
Attorney for Plaintiffs

VERIFICATION

Robert J. Kline, Jr., Plaintiff above named, hereby verifies that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Jan 22, 2008



Robert J. Kline, Jr.
Plaintiff

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and **HRI, INC.**, and **DIANA RICE**,
individually and as an agent or employee
of **HRI, INC.**.

Defendants.

* In the Court of Common Pleas of
Clearfield County, Pennsylvania
CIVIL DIVISION

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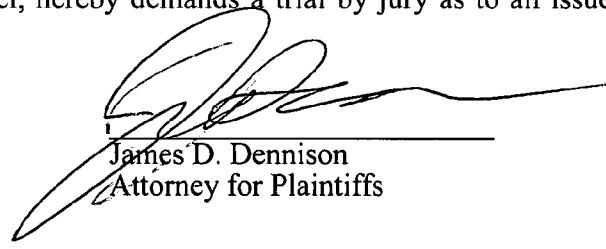
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* Number 2008-01586 C.D.

DEMAND FOR TRIAL BY JURY

Plaintiff, by his undersigned counsel, hereby demands a trial by jury as to all issues so triable.

January 22, 2009



James D. Dennison
Attorney for Plaintiffs

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Answer, New Matter
and Crossclaim Pursuant to
Pa.R.C.P. 1031.1

Filed on behalf of: Defendant, Christopher
Stott

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

FILED
M 10.02.01
FEB 25 2009
S
William A. Shaw
Prothonotary/Clerk of Courts
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ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division

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* Number 1586 - 2008 C.D.

NOTICE TO PLEAD

TO: ROBERT J. KLINE, JR., PLAINTIFF:

You are hereby notified to plead to the within New Matter within twenty (20) days from service hereof or a default judgment may be entered against you.

TO: DIANA RICE and HRI, INC., DEFENDANTS:

You are hereby notified to plead to the within Crossclaim pursuant to Pa.R.C.P. 1031.1 within twenty (20) days from service hereof or a default judgment may be entered against you.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for the Defendant,
Christopher Stott

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
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* Number 1586 - 2008 C.D.

ANSWER, NEW MATTER AND CROSSCLAIM PURSUANT TO PA.R.C.P. 1031.1

AND NOW, comes the Defendant, CHRISTOPHER STOTT, by and through his
attorneys, Dennison, Dennison & Harper, who file the following Answer, New Matter and
Crossclaim Pursuant to Pa.R.C.P. 1031.1 in response to the Plaintiff's Complaint:

1. After reasonable investigation, the Defendant, Christopher Stott, is without sufficient
knowledge and information to form a belief as to the truth of the averments of Paragraph 1 of the
Plaintiff's Complaint, and said averments are therefore denied.
2. Admitted.
3. After reasonable investigation, the Defendant, Christopher Stott, is without sufficient
knowledge and information to form a belief as to the truth of the averments of Paragraph 3 of the
Plaintiff's Complaint, and said averments are therefore denied.
4. After reasonable investigation, the Defendant, Christopher Stott, is without sufficient
knowledge and information to form a belief as to the truth of the averments of Paragraph 4 of the

Plaintiff's Complaint, and said averments are therefore denied.

5. The averments of Paragraph 5 of the Plaintiff's Complaint are admitted only insofar as the Plaintiff was operating a vehicle on August 25, 2006, on South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraph 5 of the Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

6. The averments of Paragraph 6 of the Plaintiff's Complaint are admitted only insofar as the Defendant, Christopher Stott, was operating a vehicle on August 25, 2006, on South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraph 6 of the Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

7. The averments of Paragraph 7 of the Plaintiff's Complaint are admitted only insofar as on August 25, 2006, a flag person was located at or near South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraph 7 of the Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

8. After reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments of Paragraph 8 of the Plaintiff's Complaint, and said averments are therefore denied.

9. The averments of Paragraph 9 of the Plaintiff's Complaint are admitted only insofar as the Plaintiff and the Defendant, Christopher Stott, were operating vehicles on August 25, 2006, on South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraph 9 of the Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

10. The averments of Paragraph 10 of the Plaintiff's Complaint are admitted only insofar as the Plaintiff and the Defendant, Christopher Stott, were operating vehicles on August 25, 2006, on South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraph 10 of the Plaintiff's Complaint are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

11. The averments of Paragraph 11 of the Plaintiff's Complaint and subparagraphs (a) through (i) thereof, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required.

12. The averments of Paragraph 12 of the Plaintiff's Complaint constitute conclusions of law to which no response is required and are otherwise denied pursuant to Pa.R.C.P. 1029(e).

COUNT I

PLAINTIFF, ROBERT A. KLINE, JR. vs. DEFENDANT, CHRISTOPHER STOTT

13. Paragraph 13 of the Plaintiff's Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 12

of this Answer are incorporated herein by reference thereto.

14. The averments of Paragraph 14 of the Plaintiff's Complaint alleging any negligent or reckless conduct by the Defendant, Christopher Stott, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 14 of the Plaintiff's Complaint, after reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

15. The averments of Paragraph 15 of the Plaintiff's Complaint alleging any negligent or reckless conduct by the Defendant, Christopher Stott, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 15 of the Plaintiff's Complaint, after reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

16. The averments of Paragraph 16 of the Plaintiff's Complaint alleging any negligent or reckless conduct by the Defendant, Christopher Stott, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 16 of the Plaintiff's Complaint, after reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

17. The averments of Paragraph 17 of the Plaintiff's Complaint alleging any negligent or reckless conduct by the Defendant, Christopher Stott, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 17 of the Plaintiff's Complaint, after reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

18. The averments of Paragraph 18 of the Plaintiff's Complaint alleging any negligent or reckless conduct by the Defendant, Christopher Stott, are denied pursuant to Pa.R.C.P. 1029(e), and no further response is required. With respect to the remaining averments of Paragraph 18 of the Plaintiff's Complaint, after reasonable investigation, the Defendant, Christopher Stott, is without sufficient knowledge and information to form a belief as to the truth of the averments, and said averments are therefore denied.

WHEREFORE, the Defendant, Christopher Stott, demands judgment in his favor and against the Plaintiff. **A JURY TRIAL OF TWELVE IS DEMANDED.**

COUNT II

PLAINTIFF, ROBERT A. KLINE, JR. vs. DEFENDANTS, DIANA RICE AND HRI, INC.

19. Paragraph 19 of the Plaintiff's Complaint fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of Paragraphs 1 through 18 of this Answer are incorporated herein by reference thereto.

20. The averments of Paragraph 20 of the Plaintiff's Complaint are admitted only insofar as the Defendant, Christopher Stott, was operating a vehicle on August 25, 2006, on South Second Street in the Borough of Clearfield, Clearfield County, Pennsylvania. All other averments of Paragraphs 20 of the Plaintiff's Complaint are directed to a party other than the answering Defendant, Christopher Stott, and as such, no response is required by this answering Defendant.

21. through 26. The averments of Paragraphs 21 through 26 of the Plaintiff's Complaint and all subparagraphs thereof, are directed to parties other than the answering Defendant, Christopher Stott, and as such, no response is required by this answering Defendant.

WHEREFORE, the Defendant, Christopher Stott, demands judgment in his favor and against the Plaintiff. **A JURY TRIAL OF TWELVE IS DEMANDED.**

NEW MATTER DIRECTED TO PLAINTIFF

27. The terms and conditions of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., are hereby incorporated herein by reference thereto as fully as the same bar and/or diminish any claim or cause of action of the Plaintiff.

28. At the time of the accident complained of in the Plaintiff's Complaint and at all times material hereto, the Plaintiff was subject to the limited tort option under the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq.

29. The Plaintiff did not sustain serious injuries, as defined by the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended, 75 Pa.C.S.A. §1701 et seq., as a result of the accident described in the Plaintiff's Complaint and, therefore, all claims for noneconomic damages are barred.

30. The injuries and/or damages allegedly sustained by the Plaintiff, without admission of the same, were caused or contributed to, in whole or in part, by persons or entities other than the Defendant, Christopher Stott, and over whom the Defendant, Christopher Stott, had no control, and for whose actions the Defendant, Christopher Stott, is not liable.

31. All of the Plaintiff's claims are or may be barred by the applicable statute of limitations.

32. All of the Plaintiff's claims are barred by the sudden emergency doctrine.

33. The Plaintiff has failed to state a cause of action against the Defendant, Christopher Stott, upon which relief can be granted.

WHEREFORE, the Defendant, Christopher Stott, demands judgment in his favor and against the Plaintiff. **A JURY TRIAL OF TWELVE IS DEMANDED.**

**CROSSCLAIM PURSUANT TO PA.R.C.P. 1031.1 DIRECTED TO
THE DEFENDANT, DIANA RICE**

34. The Defendant, Diana Rice, is solely liable to the Plaintiff for any alleged damages suffered by him, without admission of the same, and the averments of the Plaintiff's Complaint directed against the Defendant, Diana Rice, are incorporated herein by reference thereto without

admitting or adopting the truth of the same solely for the purpose of establishing a claim for sole liability.

35. If the Defendant, Christopher Stott, is held liable to the Plaintiff on any cause of action as set forth in the Plaintiff's Complaint, such liability being expressly denied, then the Defendant, Diana Rice, is liable over to the Defendant, Christopher Stott, for contribution and/or indemnity, and the averments of the Plaintiff's Complaint directed against the Defendant, Diana Rice, are incorporated herein by reference thereto without admitting or adopting the truth of the same solely for the purpose of establishing a claim against the Defendant, Diana Rice, for indemnity and contribution.

WHEREFORE, the Defendant, Christopher Stott, demands judgment against the Defendant, Diana Rice, as being solely liable for the damages claimed by the Plaintiff, or in the alternative, as being liable over to the Defendant, Christopher Stott, for indemnity and/or contribution. **JURY TRIAL OF TWELVE DEMANDED.**

**CROSSCLAIM PURSUANT TO PA.R.C.P. 1031.1 DIRECTED TO
THE DEFENDANT, HRI, INC.**

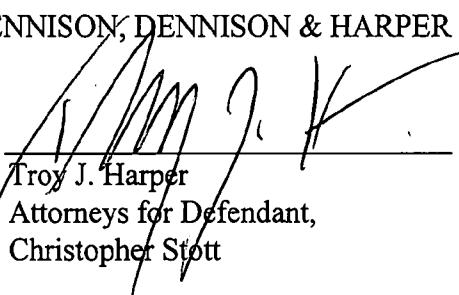
36. The Defendant, HRI, Inc., is solely liable to the Plaintiff for any alleged damages suffered by him, without admission of the same, and the averments of the Plaintiff's Complaint directed against the Defendant, HRI, Inc., are incorporated herein by reference thereto without admitting or adopting the truth of the same solely for the purpose of establishing a claim for sole liability.

37. If the Defendant, Christopher Stott, is held liable to the Plaintiff on any cause of action as set forth in the Plaintiff's Complaint, such liability being expressly denied, then the Defendant, HRI, Inc., is liable over to the Defendant, Christopher Stott, for contribution and/or indemnity, and the averments of the Plaintiff's Complaint directed against the Defendant, HRI, Inc., are incorporated herein by reference thereto without admitting or adopting the truth of the same solely for the purpose of establishing a claim against the Defendant, HRI, Inc., for indemnity and contribution.

WHEREFORE, the Defendant, Christopher Stott, demands judgment against the Defendant, HRI, Inc., as being solely liable for the damages claimed by the Plaintiff, or in the alternative, as being liable over to the Defendant, Christopher Stott, for indemnity and/or contribution. **JURY TRIAL OF TWELVE DEMANDED.**

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant,
Christopher Stott

VERIFICATION

I verify that the averments made in the foregoing Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 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.A. Section 4904, relating to unsworn falsification to authorities.



Christopher Stott

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 was served on the 24th day of February,
2009 by United States Mail, First Class, Postage Prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, Pennsylvania 15825
(Counsel for the Plaintiff)

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, Pennsylvania 16801
(Counsel for Defendants HRI, Inc. and Diana Rice)

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant,
Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Reply to Defendants,
HRI, Inc. and Diana Rice's, Crossclaim
Pursuant to Pa.R.C.P. 1031.1

Filed on behalf of: Defendant, Christopher
Stott

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

FILED NO CC
M 19 02 2009 MAR 02 2009 (610)
William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division

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* Number 1586 - 2008 C.D.

**REPLY TO DEFENDANTS, HRI, INC. AND DIANA RICE'S, CROSSCLAIM
PURSUANT TO PA.R.C.P. 1031.1**

AND NOW, comes the Defendant, CHRISTOPHER STOTT, by and through his
attorneys, Dennison, Dennison & Harper, who file the following Reply to Defendants, HRI, Inc.
and Diana Rice's, Crossclaim Pursuant to Pa.R.C.P. 1031.1:

37. Paragraph 37 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to
Pa.R.C.P. 1031.1 fails to contain any specific averments of fact and is merely an incorporation
clause to which no response is deemed required. To the extent any further response would be
deemed required, the averments of the Defendant, Christopher Stott's, Answer, New Matter and
Crossclaim Pursuant to Pa.R.C.P. 1031.1 filed in response to the Plaintiff's Complaint are
incorporated herein by reference thereto.

38. Paragraph 38 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to
Pa.R.C.P. 1031.1 fails to contain any specific averments of fact and is merely an incorporation

clause to which no response is deemed required. To the extent any further response would be deemed required, the averments of the Defendant, Christopher Stott's, Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 filed in response to the Plaintiff's Complaint are incorporated herein by reference thereto.

39. Paragraph 39 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to Pa.R.C.P. 1031.1 fails to contain any specific averments of fact and is merely an incorporation clause to which no response is deemed required. To the extent any further response would be deemed required, said averments constitute conclusions of law, and the averments of the Defendant, Christopher Stott's, Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 filed in response to the Plaintiff's Complaint are incorporated herein by reference thereto.

40. The averments of Paragraph 40 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to Pa.R.C.P. 1031.1 constitute conclusions of law and are otherwise denied pursuant to Pa.R.C.P. 1029(e).

41. The averments of Paragraph 41 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to Pa.R.C.P. 1031.1 constitute conclusions of law and are otherwise denied pursuant to Pa.R.C.P. 1029(e) and the averments of the Defendant, Christopher Stott's, Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 filed in response to the Plaintiff's Complaint are incorporated herein by reference thereto.

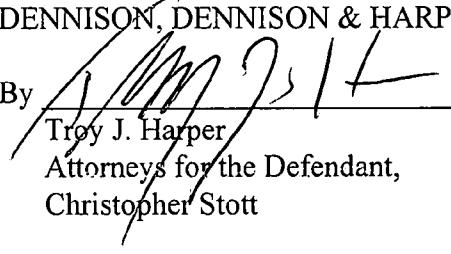
42. The averments of Paragraph 42 of the Defendants, HRI, Inc. and Diana Rice's, Crossclaim Pursuant to Pa.R.C.P. 1031.1 constitute conclusions of law and are otherwise denied

pursuant to Pa.R.C.P. 1029(e), and the averments of the Defendant, Christopher Stott's Answer, New Matter and Crossclaim Pursuant to Pa.R.C.P. 1031.1 filed in response to the Plaintiff's Complaint are incorporated herein by reference thereto.

WHEREFORE, the Defendant, Christopher Stott, demands judgment in his favor and against all other parties. **JURY TRIAL OF TWELVE DEMANDED.**

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

VERIFICATION

I verify that the averments made in the foregoing Reply to Crossclaim 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.A. Section 4904, relating to unsworn falsification to authorities.



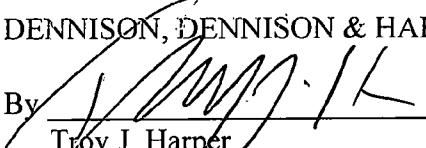
Christopher Stott

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Reply to Crossclaim was served on the 27th day of February, 2009, by United States Mail, First Class, Postage Prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, Pennsylvania 15825
(Counsel for the Plaintiff)

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, Pennsylvania 16801
(Counsel for Defendants HRI, Inc. and Diana Rice)

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR.,

Plaintiff, : Docket No. 2008-01586 C.D.

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

Type of Case:

Civil Action

Type of Pleading:

**Defendants HRI, Inc. and
Diana Rice's Reply to
Defendant Stott's Crossclaim**

Filed on Behalf of Defendants HRI
and Diana Rice

Counsel of Record for This Party

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 S. Atherton Street
State College, PA 16801
(814) 234-1500

FILED NO CC
M 1025 BDT
MAR 04 2009 (60)

William A. Shaw
Prothonotary/Clerk of Courts

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR.,	:	
	:	
Plaintiff,	:	Docket No. 2008-01586 C.D.
	:	
vs.	:	
	:	
CHRISTOPHER STOTT, individually, and HRI, INC., and DIANA RICE, individually and as an agent or employee of HRI, INC.,	:	
	:	
Defendants.	:	

**DEFENDANTS HRI AND DIANA RICE'S REPLY TO
DEFENDANT STOTT'S CROSSCLAIM**

AND NOW, come Defendants, HRI, Inc. and Diana Rice, by and through their undersigned counsel, and file this Reply to Defendant Stott's Crossclaim and state in support thereof as follows:

**CROSSCLAIM PURSUANT TO Pa.R.C.P. 1031.1
DIRECTED TO DEFENDANT RICE**

34. Each and every allegation set forth in Paragraph 34 of Defendant Stott's Crossclaim against Defendant Rice is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e). By way of further response, Defendant Rice bears no negligence, responsibility, or liability to any party.

35. Each and every allegation set forth in Paragraph 35 of Defendant Stott's Crossclaim against Defendant Rice is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e). By way of further response, Defendant Rice bears no negligence, responsibility, or liability to any party.

WHEREFORE, Defendant Rice demands judgment in her favor and against Plaintiff and Defendant Christopher Stott and for such other and further relief as the Court deems just and proper.

CROSSCLAIM PURSUANT TO Pa.R.C.P. 1031.1
DIRECTED TO DEFENDANT HRI, INC.

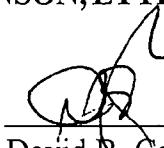
36. Each and every allegation set forth in Paragraph 36 of Defendant Stott's Crossclaim against Defendant HRI is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e). By way of further response, Defendant HRI bears no negligence, responsibility, or liability to any party.

37. Each and every allegation set forth in Paragraph 37 of Defendant Stott's Crossclaim against Defendant HRI is specifically denied and denied generally pursuant to Pa.R.C.P. 1029(e). By way of further response, Defendant HRI bears no negligence, responsibility, or liability to any party.

WHEREFORE, Defendant HRI demands judgment in its favor and against Plaintiff and Defendant Christopher Stott and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: March 3, 2009

VERIFICATION

Based on information provided to me by Defendants HRI, Inc. and Diana Rice, I verify that the statements contained in the foregoing document are true and correct to the best of my information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities.



David B. Consiglio, Esquire
Attorney for Defendants HRI, Inc. and Diana Rice

Dated: March 3, 2009

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR., :
: Plaintiff, : Docket No. 2008-01586 C.D.
: vs. :
: CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
: Defendants. :

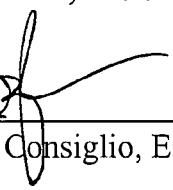
CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc., do hereby certify that on this 3rd day of March, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER, & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire

FILED

MAY 27 2009

5 11:55 AM
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

1 cent to

Attn:

ROBERT J. KLINE,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 2008 - 01586 C.D.

Type of Case: Civil Division

Type of Pleading: Motion to Compel

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

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

ROBERT J. KLINE,
Plaintiff,
vs.
CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,
Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
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* Civil Action - Law
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* Number 2008 - 01586 C.D.

MOTION TO COMPEL

AND NOW, comes the Defendant, CHRISTOPHER STOTT, by his attorneys, Dennison, Dennison & Harper, who file the following Motion to Compel pursuant to Pa.R.C.P. 4019:

1. The above-captioned action was instituted by Summons filed by the Plaintiff on or about August 25, 2008.
2. On November 26, 2008, the Defendant, Christopher Stott, filed a Praecept for Rule to File Complaint.
3. On November 26, 2008, the Clearfield County Prothonotary issued a Rule to File Complaint.
4. On or about January 22, 2009, the Plaintiff filed a Complaint alleging that on or about August 25, 2006, the Plaintiff was injured in a two-vehicle accident which occurred on South Second Street, in Clearfield, Pennsylvania.
5. On or about February 9, 2009, the Defendant, Christopher Stott, served a First Set of Interrogatories and a First Set of Request for Production of Documents Directed to the Plaintiff

upon counsel for the Plaintiff. A true and correct copy of the Interrogatories, Request for Production of Documents and the Certificate of Service are attached hereto as Exhibit "A" and made part hereof.

6. Pursuant to Pa.R.C.P. 4006 (a)(2) and 4009.12, the Plaintiff's Answers to the Interrogatories and Request for Production of Documents were due on or before March 9, 2009.

7. The Plaintiff failed to answer the Interrogatories and Request for Production of Documents by March 9, 2009.

8. By letter dated April 7, 2009, directed to counsel for the Plaintiff, counsel for the Defendant, Christopher Stott, requested that the Plaintiff respond to the Interrogatories and Request for Production of Documents within fifteen (15) days. A true and correct copy of Defendant Christopher Stott's counsel's file copy of the letter dated April 7, 2009, is attached hereto as Exhibit "B" and made part hereof.

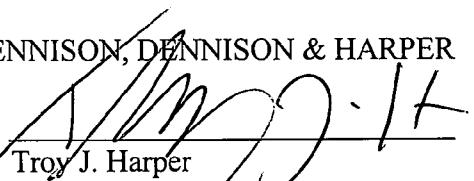
9. To date, the Plaintiff has failed to respond to the Interrogatories and Request for Production of Documents.

WHEREFORE, the Defendant, Christopher Stott, requests this Honorable Court to enter an Order directing the Plaintiff to file full and complete answers to the Interrogatories and responses to the Request for Production of Documents within twenty (20) days, and, if the

Plaintiff fails to file full and complete answers within the allotted time, to impose appropriate sanctions and such other relief the Court deems appropriate.

DENNISON, DENNISON & HARPER

By



Troy J. Harper

Attorneys for the Defendant,
Christopher Stott

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

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

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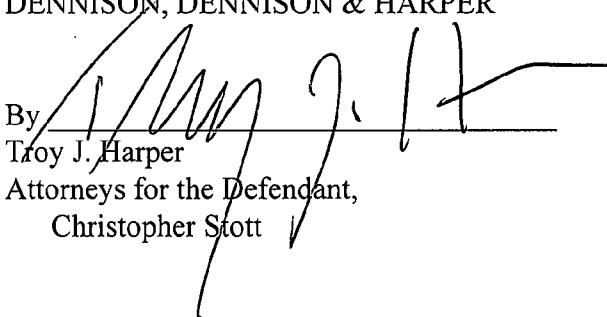
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* Number 2008 - 01586 C.D.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 208.2(e)

Troy J. Harper, as counsel for the Defendant, Christopher Stott, certifies that the movant has in good faith attempted to confer with counsel for the Plaintiff failing to make the discovery in an effort to secure the information or material without court action.

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 2008 - 01586 C.D.

Type of Case: Civil Division

Type of Pleading: First Set of Interrogatories
Directed to Plaintiff

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

Exhibit "A"

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania

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* Civil Division

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* Number 2008 - 01586 C.D.

FIRST SET OF INTERROGATORIES DIRECTED TO PLAINTIFF

TO : ROBERT J. KLINE, JR.

PURSUANT TO THE PROVISIONS of Pa.R.C.P. 4005 and 4006, as amended, you are required to serve on the undersigned your Answers and Objections, if any, in writing, to the following Interrogatories, within thirty (30) days after service of the Interrogatories.

The Answers shall be inserted in the spaces provided following each Interrogatory. If there is insufficient space to answer an Interrogatory, the remainder of the Answer shall follow on a supplemental sheet.

These Interrogatories shall be deemed to be continuing in nature, in accordance with provisions of Pa.R.C.P. 4007.4, as amended. If between the time of serving your original Answers to these Interrogatories, and the time of trial of this matter, you or anyone acting in your behalf learn the identity of persons expected to be called as an expert witness at trial not disclosed in your Answers, or if you or an expert witness obtain information upon the basis of

which you or he knows that an Answer was incorrect when made, or knows that an Answer though correct when made is no longer true, then you shall promptly supplement your original Answers under oath to include such information thereafter acquired, and promptly furnish such a Supplemental Answer to the undersigned.

DEFINITIONS AND INSTRUCTIONS

The term "you" and "your" when used in this set of discovery refers to you the Plaintiff, Robert J. Kline, Jr., and your agents, representatives, employees, or attorneys (if no privilege is applicable).

The term "person" means any individual, corporation, partnership, or association, or any other business or governmental entity.

The term "document" is used in its broadest sense and includes all originals or copies of any nature whatsoever (whether identical or non-identical) pertaining to any medium upon which intelligence or information is recorded, and includes written, printed, typed, recorded or graphic matter, however produced or reproduced, including (but not limited to) the following: correspondence; telegrams; reports; statements (whether verbatim or summary); books; magazines; notebooks; recordings (whether stenographic, mechanical, magnetic, electric, transcription, or in other format); tapes; contracts; agreements; notes; summaries; memoranda; telephone messages; analyses; projections or movie films; slides; x-rays; indices; studies; surveys; notebooks; diaries; calendars; appointment books; films; photographs; proof sheets; graphs; sketches; plans; drawings; maps; charts; tablets; papers; diagrams; minutes of meetings;

all computerized records, whether in the form of hard copy, disc, or other software, or memory storage; ledgers; worksheets; appraisals; estimates; bids; quotations; repair orders; invoices; manuals; weigh slips; logs; authorizations; brochures; circulars and also including, but not limited to, any type of document more particularly described in any Document Request or Interrogatory, (or including copies of any of the foregoing, regardless or whether or not Defendant is in possession, custody or control of the original).

The term "statement" means a written statement, signed or otherwise adopted or approved by the person making it, or a stenographic, mechanical, electrical, or other recording, or a transcription thereof, which is substantially a verbatim recital or an oral statement by the person mailing it and contemporaneously recorded.

The term "event", "collision", "incident" or "accident", unless the context clearly indicates otherwise, shall refer to the incident detailed in Plaintiff's Complaint giving rise to Plaintiff's claim(s).

The term "identity" or "identify", when used in this discovery, has the following meanings:

- A. When used in reference to an individual, it means to state the person's full name, present or last known business and home address, and the present or last known business or governmental affiliation and job title.
- B. When used in reference to any person other than an individual, it means to state the person's full name and any names by which it does business, and a current or last known address.

C. When used in reference to a corporation, it means to state the corporate name, the date and place of incorporation, and all of its present business addresses.

D. When used in reference to statements or communications, it means to describe the statements and communications by stating the date and place where they were made, by indicating whether they are oral, written, or reduced to writing, identifying each of the makers and recipients in addition to all persons present, and indicating the medium of communications. If only an approximate date is given, it will be presumed that you have no recall or specific knowledge as to the exact date.

E. When in reference to a document or documentary evidence, it means to state the type of document (letter, memorandum, telegram, etc.), its author and originator, its date or dates, all addresses and recipients, its present location or custodian, the topic it deals with, with such reasonable particularity as is sufficient for a specific demand for production, and any identifying marks, numerals, code words or letters distinguishing it from other like documents. Documents to be identified shall include all those documents in your possession, custody, or control, and all of the documents of which you have knowledge.

If you refuse to answer any interrogatory in whole or in part, or refuse to provide any of the documents requested, please describe the basis for your refusal to answer or provide the documents, including any claim of privilege, with sufficient detail so as to permit the court to adjudicate the validity of your refusal, and identify each document and oral communication for which privilege is claimed.

**YOU ARE HEREBY REQUESTED TO ANSWER EACH OF THE FOLLOWING
INTERROGATORIES WITH RESPECT TO THE PLAINTIFF, ROBERT J. KLINE, JR.,
UNLESS INDICATED OTHERWISE.**

1. Please provide the full name, current address, date of birth, social security number, and marital status including the date of any marriages and divorces for the Plaintiff.
2. Please provide a list of all alias names and/or identities ever used by the Plaintiff.
3. Please provide the address where the Plaintiff was residing at the time of the incident alleged in your Complaint and provide the names, ages and relationships to you of every other person residing at said address at that time.

4. Please list the names, addresses and telephone numbers of all physicians and medical care providers seen by you for the injuries which you allege to have sustained in the incident described in your Complaint and the dates on which you were treated by that person.

5. Please list the names and addresses of all hospitals, clinics and convalescent homes wherein you received medical attention for the injuries you allege were caused by the incident described in your Complaint and list the dates on which you were treated at each of the institutions listed.

6. Please set forth an itemized list of all charges made by all those medical care providers listed in the answers to Interrogatories 4 and 5 and attach copies of all bills presented to you by the same.

7. If you have ever in your lifetime suffered from any injuries, illnesses, diseases, sicknesses, or abnormalities which required any type of medical treatment involving those portions of your body which you allege were injured in the incident described in your Complaint, including but not limited to your neck, left shoulder and trapezius muscle, set forth the following:
- a. the names and addresses of all doctors or hospitals that rendered service in connection therewith and the nature of the service or treatment rendered;
 - b. the type and/or nature of the injuries, illnesses, diseases, sicknesses, or abnormalities;
 - c. whether the injuries, illnesses, diseases, sicknesses, or abnormalities were the result of any type of accident;

(1) If the answer to subparagraph c. is yes, please provide the following information:

(a) the date, time, location and nature of the accident; and

(b) whether any lawsuit was filed as the result of the accident, and if so, the name and docket number of the Court where the lawsuit was filed.

8. Please state whether you suffered from any emotional, mental, psychological and/or nervous condition prior to or subsequent to the date of the incident described in your Complaint. If yes, please provide the name, address and telephone number of any medical care provider including any doctor, therapist, psychologist or psychiatrist who provided any treatment for such condition.

9. Were you under any physical disability at the time of the incident described in the Complaint? If so, state:

(a) the nature of such disability;

(b) the length of time such disability had occurred prior to the date of the incident described in the Complaint; and,

(c) The names and addresses of physicians and other medical practitioners who treated you for such disability.

10. Please provide the names, addresses and telephone numbers of any and all physicians, doctors or medical care providers who have treated you:

- a. as your family physician in the last ten years; and
- b. for any injury, sickness or disease in the last ten years.

11. Please identify in detail to the following for each person whom you expect to call as an expert witness at trial:

- a. full name, home address, business address;
- b. the subject matter on which the expert is expected to testify;
- c. the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

12. For the ten (10) years immediately preceding the date of the incident described in your Complaint, state the following:

- a. the name and address of each of your employers or, if you were self-employed during that period, each of your business addresses and the name and nature of your business while self-employed;
- b. the dates of commencement and termination of each of your periods of employment or self-employment;
- c. a detailed description of the nature of your occupation in each employment or self-employment;
- d. the amount of income, wages or salary you earned from such employment or self-employment.

13. Are you making a claim for past, present or future lost wages or future earning capacity as a result of the incident described in the Complaint? If so, state the following:
- a. the following information as of the time of the incident described in your Complaint:
- (1) the name and address of your employer at the time of the incident;
 - (2) the date you started your employment with the employer;
 - (3) the date you last worked for your employer prior to the accident;
 - (4) the nature of your work;
 - (5) your hourly wage or salary;
 - (6) the number of hours you worked on average per week;
 - (7) the number of work days lost as a result of the accident and injuries described in the Complaint and the dates of those lost days; and
 - (8) the amount of any wages or income lost and describe in detail how the loss was calculated.

(9) whether you received any type of loss income benefits or disability benefits from any source for said lost wages and, if so, state the name and address of the entity providing said benefits and provide the policy number or claim number assigned to said benefits claim.

b. the following information at the present time;

(1) the name and address of your employer;

(2) the date you started your employment with your current employer;

(3) your hourly wage or salary; and

(4) the number of hours you work on average per week.

c. Please attach copies of your Federal Income Tax Returns for years 2004 through 2007.

14. At the time of the accident described in your Complaint, state whether nor not you were acting within the scope of your employment for any person or entity or otherwise performing acts or duties associated with any employment, including but not limited to errands, deliveries, drop-offs, pick-ups or travel between job sites or locations. If your answer is in the affirmative, state the following:

a. the name, address and telephone number of your employer or any person or entity for whom you were performing the act or duty; and

b. the precise act or duty you were performing at the time of the incident described in the Complaint.

15. As a result of the incident described in your Complaint, did you make a claim for Workman's Compensation Benefits or like benefits? If the answer is the affirmative, state the following:

- a. the name, address and telephone number of the entity and/or insurance carrier providing said benefits;
- b. the policy number under which said benefits were payable;
- c. the claim number assigned to said benefits claim;
- d. the name, address and telephone number of any claim representative or like person assigned to administer said claim; and
- e. whether or not you have been notified of any lien for said benefits and if so, provide the total amount of said lien being claimed.

16. Have you ever made application or claim for any other Workmen's Compensation Benefits in the last yen (10) years? If yes, please state the following for each application:

- a. the name and address of your employer at the time of the application or claim;

- b. the date on which you made any application or claim for such benefits;
- c. the nature and extent of the injury or condition which was the basis for any such application or claim; and
- d. the date on which the injury or condition began which was the basis for any such application or claim.

17. Are you now receiving or have you ever received any income or benefits under any disability, pension or income insurance policy or any Workmen's Compensation from any agency, company, person, corporation, state or governmental agency for any disability, condition, disease, ailment or injury?

If yes, please state the following:

- a. under what program or policy you received any payment;

- b. the dates you received such payments and the amounts of such payments;
- c. the injuries or disability for which you received any payment and when such injuries or disability arose;
- d. the name of the company, person, corporation or agency which made any payments;
- e. whether you now have any permanent disability as a result of such injuries or disability for which you received any payments, and if so, the nature and extent of the disability;
- f. whether you had a disability at the time of the incident referred to in your Complaint, and if so, the nature and extent of the disability.

18. Please provide the name, home address, business address (if any), and your relationship to any person known to you, your agents, representatives or attorney who witnessed the events: (1) for the five-minute period prior to the incident described in your Complaint; (2) at

the time of the incident described in your Complaint; and (3) the two-hour period after the incident described in your Complaint.

19. Please state the name, home address, business address (if any) and job classification of all persons whom you intend to call as nonexpert witnesses on your behalf at the trial of this case and the substance on which you expect them to testify.

20. In regard to the date of the incident described in the Complaint, please state in detail your activities and whereabouts for the 12-hour period preceding the incident including, but not limited to your place of origin, your destination, and the nature and length of any stops you made.

21. Please state the purpose of your trip on the day of the accident and your intended destination.

22. Please state whether or not you had taken any prescription or nonprescription medication within the 24-hour period preceding the incident. If yes, please provide the name of the medication and the time it was taken.

23. Please state the following in regard to any alcoholic beverages you consumed in the twelve-hour period prior to the incident described in Plaintiff's Complaint:

- a. the name or brand of each beverage;
- b. the total number of beverages by serving and weight; and
- c. the location by name of establishment and address of where the beverages were purchased and the name and address of the person who purchased such beverages.

24. Please state in detail without reference to your Complaint and in your own words how the incident described in your Complaint occurred.

25. Have you ever been involved in any other accident involving a motor vehicle including but not limited to as an operator, passenger or pedestrian?

If the answer to this Interrogatory is yes, please provide the following information for each accident:

- a. the date and location of the accident;

- b. the names and addresses of any other persons involved in the accident;

- c. a description in detail of the events of the accident;
- d. the nature of any injuries you received in the accident;
- e. the names and addresses of any medical care providers who treated you for any injuries;
- f. whether any lawsuit was filed as the result of the accident, and if so, the name and docket number of the Court where the lawsuit was filed and the name and address of the attorney or law firm which represented you; and
- g. Attach a copy of any police report issued as a result of the accident.

26. Identify each automobile policy by insurance company, named insured and policy number in existence within your residence on the date of the incident described in the Complaint and attach copies of the declaration page for each policy.

27. List the tort option(s) by or under which you were covered on any automobile policy(ies) on which you are a named insured or were insured on the date of the incident described in the Complaint.

28. Please state whether any claim for First Party Benefits or like benefits was opened by any insurance company identified in your answer to Interrogatory 26 or any other insurance company as a result of the incident described in your Complaint. If yes, please provide the following information:

- a. the address of the claims office handling the claim;

- b. the name of the adjuster assigned to handle the claim; and
- c. the claim number assigned to the claim.

29. Please state whether or not you owned a motor vehicle/automobile on the date of the accident. If so, please state the following for each motor vehicle/automobile:

- a. the make, model and vehicle identification number;

- b. whether the vehicle had a current registration as of the date of the accident described in the Complaint;

- c. whether or not the vehicle was insured under a policy of automobile insurance as of the date of the accident described in the Complaint, and, if so, the name of the insurance carrier and policy number.

30. Describe any traffic citations you received as a result of this collision by stating the name and location of the court involved, the violation of the law charged in that citation, and the date, place and manner (i.e. type of plea, bail, forfeit, trial, etc.) of disposition of the citation.

31. Have you ever been charged with or convicted of any crime other than a traffic citation with the last ten years; if yes, please provide the following information:

- a. the date, state and county where the criminal offense took place;
- b. the name and address of the issuing authority, i.e. police department; and
- c. the final disposition of the criminal charge.

32. Please provide a detailed list of any incidental or out-of-pocket expenses you allege you incurred as a result of the accident described in your Complaint, including the following information for each of the expenses:

- a. the amount of the expense;

- b. the date of the expense;
- c. a description of what the expense was for;
- d. the name of the person, agency or company to whom the expense was paid; and
- e. Attach copies of any records in your possession supporting the expenses.

33. Please state whether you were covered under any type of health insurance plan, HMO, or group health insurance plan for the period from two years prior to the accident until the present. If so, please provide the name and address of the plan provider, the group number, the identification number, the plan number and dates of coverage for each such plan.

34. With regard to any medical bills you have incurred as a result of the incident described in your Complaint, please state the following:

- a. the name of any insurance company, group program, HMO or other agency which has provided payment for said bills;

b. whether or not you have been notified of any lien and/or subrogation claim in regard to any payments made by any insurance company, group program, HMO, or other agency, and if so, the amount of any such lien and/or subrogation claim. Also, please provide copies of any documents identifying the notice and amount of the lien.

35. Please state whether or not you have been notified by any company, entity or agency of a lien and/or subrogation claim in regard to the payment of any costs or damages related to the accident and your injuries, and if so, please state the following:

- a. the name of any company, entity or agency which has provided payment for said bills;

- b. the amount of any such lien and/or subrogation claim. Also, please provide copies of any documents identifying the notice and amount of the lien.

36. Please state whether any representative, investigator, employee of yours or of your attorney has conducted any investigation on your behalf relating to your claims in this matter.

If yes, please provide the following information:

- a. the name, address, employer, job title, position or capacity of each such person; and
- b. whether any such person has prepared any notes, memoranda or summaries in connection with any such investigation, and if yes, provide copies of the same.

37. In regard to the vehicle in which you were present at the time of the incident described in your Complaint, please state your location within the vehicle, and the names, addresses, and locations within the vehicle of any other persons.

38. Please state whether or not you have entered into any settlement with any other person, entity, agency or insurance carrier for any claim arising from the accident described in your Complaint including, but not limited to, claims for first party benefits, under-insurance coverage, workman's compensation claims, medical expense claims and/or lost wage claims. If so, please provide the name of the person or entity with whom the settlement was made and attach a copy of all releases that were executed.

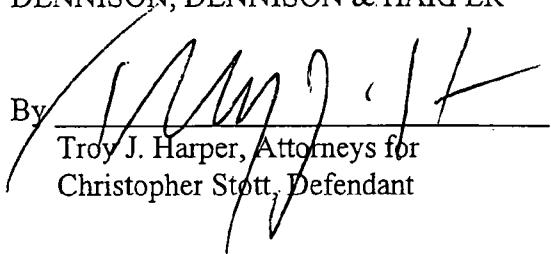
39. State whether, as a result of the accident described in your Complaint, you have been unable to perform or had to modify how you perform any of your customary occupational duties or social or other activities as compare to prior to the accident, stating with particularity:

- a. the duties and/or activities you have been unable to perform or have had to modify and state how you have had to modify the same;
- b. the periods of time you have been unable to perform any said activities;
- c. the names, addresses and telephone numbers of all persons having knowledge thereof.

40. If you have not fully recovered from the injuries alleged in your Complaint, said in detail in what respect you have not fully recovered.

DENNISON, DENNISON & HARPER

By


Troy J. Harper, Attorneys for
Christopher Stott, Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 01586 C.D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Type of Pleading: First Set of Request for
Production of Documents Directed to
Plaintiff

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
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*
*
* Number 2008 - 01586 C.D.

**FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFF**

TO: ROBERT J. KLINE, JR.

PLEASE TAKE NOTICE THAT PURSUANT TO Pa.R.C.P. 4009, you are required to furnish at our office, on or before thirty (30) days of service hereof, a photostatic copy of like reproduction of the materials concerning this action or its subject matter which are in your possession, custody or control and which are not protected by the attorney/client privilege; or, in the alternative, produce the said matter at said time to permit inspection and copying thereof:

A. GENERAL INSTRUCTIONS

1. This request is deemed to be continuing so as to require the production of additional documents in the event that Defendant, or his representatives learn of the existence of additional documents not originally produced. Such additional documents may be produced from time to time, but not later than fifteen (15) days after you or your representatives learn of their existence.

2. A request for production shall be deemed to request the production of all documents described in the request and in your possession or custody, or under your control, or in the possession or custody or under the control of any of your agents, servants, employees, representatives, adjustors, investigators, attorneys or accountants.

3. If you contend that any of the documents hereinafter requested is privileged, set forth, with regard to each such document, the following:

- (a) The nature of the privilege asserted;
- (b) The date(s) on which it was produced and, if different, the date(s) on which it was transmitted, distributed or otherwise provided to each person to whom it was transmitted, distributed or otherwise provided;
- (c) The full name(s), address(es) and title(s) of the document's author(s) and address(es);
- (d) The full names, addresses, and titles of all persons who received a copy of the document, including all persons who received blind copies of the document;
- (e) The nature of the document (i.e., whether it is a letter, memorandum, tape, disc, etc.);
- (f) The title of the document, if any; and,
- (g) The subject matter to which your claim of privilege relates.

4. If any document was but is no longer in your possession or subject to your control or in existence, state whether it (a) is missing or lost; (b) has been destroyed; (c) has been transferred, voluntarily or involuntarily, to others; and (d) has been otherwise disposed of. In each instance, explain the circumstances surrounding any authorization for such disposition,

including the date of such disposition; the person(s) responsible for such disposition; and the policy, rule, order or other authority by which such disposition was made.

If any document requested herein is subject to destruction under any document retention/destruction program, such documents should be exempted from any such scheduled destruction until conclusion of this lawsuit or unless otherwise permitted by the Court.

5. In these Requests, words used in the singular number shall include the plural number and words used in the plural number shall refer to the singular number as well. Gender is to be wholly disregarded, the neuter referring as well to the male and female and the male referring to the female and the neuter.

6. If, in responding to any of these Requests, you encounter any ambiguity in construing either the request for a definition or instruction relevant to the inquiry contained within the request, set forth the matter deemed ambiguous and set forth the construction chosen or used in responding to the request.

7. Whenever any objection is made to any request, documents shall be furnished in response to any portion of that request as to which there is no objection.

B. DEFINITIONS

1. As used herein, the term "document" is used in its broadest sense and includes all originals or copies of any nature whatsoever (whether identical or non-identical) pertaining to any medium upon which intelligence or information is recorded, and includes written, printed, typed, recorded or graphic matter, however produced or reproduced, including (but not limited

to) the following: correspondence; telegrams; reports; statements (whether verbatim or summary); books; magazines; notebooks; recordings (whether stenographic, mechanical, magnetic, electrical, transcription, or in other format); tapes; contracts; agreements; notes; summaries; memoranda; telephone messages; analyses; projections or movie films; slides; x-rays; indices; studies; surveys; notebooks; diaries; calendars; appointment books; films; photographs; proof sheets; graphs; sketches; plans; drawings; maps; charts; tablets; papers; diagrams; minutes of meetings; all computerized records, whether in the form of hard copy, disc, or other software, or memory storage; ledgers; worksheets; appraisals; estimates; bids; quotations; repair orders; invoices; manuals; weigh slips; logs; authorizations; brochures; circulars and also including, but not limited to, any type of document more particularly described in any Document Request or Interrogatory, (or including copies of any of the foregoing, regardless or whether or not Defendant is in possession, custody or control of the original).

2. As used herein, the term "Plaintiff" refers to Robert J. Kline, Jr.
3. The term "event", "collision", "incident" or "accident", unless the context clearly indicates otherwise, shall refer to the incident detailed in Plaintiff's Complaint giving rise to Plaintiff's claim(s).
4. The term "you" and "your" when used in this set of discovery refers to you the Plaintiff, Robert J. Kline, Jr., and your agents, representatives, employees, or attorneys (if no privilege is applicable).

C. DOCUMENTS REQUESTED

1. All medical and hospital records, reports, bills and invoices relating to any injuries or damages alleged to have been caused by the occurrence described in your Complaint.
2. All medical and hospital records, bills and invoices relating to prior or subsequent injuries to the same parts of the body claimed to have been injured as a result of the occurrence described in your Complaint.
3. All statements; whether written, recorded, signed and/or unsigned, by you or by the Defendant.
4. All statements; whether written, recorded, signed and/or unsigned, of all witnesses or potential witnesses.
5. All expert/nonexpert written reports.
6. All photographs, videotapes or other graphic representations relating to the place of the incident or the persons or other things involved.
7. Maps, drawings, charts and sketches relating to the place of the incident or the persons or things involved.
8. Any reports, notes, summaries or memoranda made by you or any person performing any investigation on your behalf or on behalf of your counsel.
9. Any appraisals, estimates, bills or orders for repair, towing or storage of any vehicle involved in the incident described in your Complaint.

10. A complete copy of the entire First Party Benefits File and/or Workman's Compensation Claim File for any claims you made to any insurance company as a result of the incident, including any and all Peer Review Reports.

11. All police reports.

12. Copies of any settlement releases you have entered into for any claim related to the accident described in your Complaint.

13. Copies of explanation of benefits forms, claim forms, invoices, notices or correspondences from any insurance company, HMO, group program, Department of Public Welfare, government agency or other provider relating to any medical expenses for treatment related to the injuries set forth in the Plaintiffs' Complaint.

14. Copies of all correspondences, notices, documents or agreements concerning any lien or subrogation claim being made by, assigned by or waived by any entity for the payment of any costs, damages, or bills related to the accident and injuries described in your Complaint.

15. All accident reports prepared by the Plaintiffs, including but not limited to accident reports submitted to the Plaintiff's employer, or on behalf of the same concerning the incident alleged in the Complaint.

16. All exhibits you intend to produce at the trial of this action.

17. A copy of the Plaintiff's driver's license.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Christopher Stott,
Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

CIVIL ACTION - LAW

Number 2008 - 01586 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

1586
ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Division

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* Number 2008 - 01586 C.D.

CERTIFICATE OF SERVICE

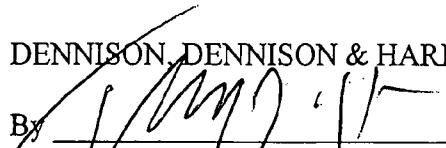
I certify that an original and one certified copy of the First Set of Interrogatories Directed to the Plaintiff and an original and one certified copy of the First Set of Request for Production of Documents Directed to the Plaintiff were served on the _____ day of February, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esquire
DENNISON LAW OFFICES, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

and one certified copy was served on the following, in the same manner:

HRI, Inc.
1750 West College Avenue
State College, PA 16823
(Defendant)

Diana Rice
1111 Cherry Street
Philipsburg, PA 16866
(Defendant)

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion to Compel was served on the 26th day of May, 2009, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esquire
DENNISON LAW OFFICES
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825
(Counsel for Plaintiff)

David B. Consiglio, Esquire
CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.
720 S. Atherton Street
State College, PA 16801
(Counsel for the Defendants, HRI, Inc. and
Diana Rice)

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR.,

Plaintiff,

Docket No. 2008-01586 C.D.

VS.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

Type of Case:

Civil Action

Type of Pleading:

**Defendants HRI, Inc. and
Diana Rice's Notice of
Service of Discovery**

Filed on Behalf of Defendants HRI
and Diana Rice

Counsel of Record for This Party

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 S. Atherton Street
State College, PA 16801
(814) 234-1500

FILED NO
M1100201
JUN 02 2009

William A. Shaw
Prothonotary/Clerk of Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
Plaintiff, : Docket No. 2008-01586 C.D.
vs. :
CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
Defendants. :

NOTICE OF SERVICE OF DISCOVERY

I hereby certify that I have served a copy of Defendant HRI, Inc. and Diana Rice's Interrogatories (Set I) and Request for Production of Documents (Set I) directed to Plaintiff and Defendant Stott upon the following persons by U. S. First Class Mail, postage prepaid on this 1st day of June, 2009.

James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: June 1, 2009

IN THE COURT OF COMMON PLEAS OF LYCOMING COUNTY, PA
CIVIL ACTION - LAW

ROBIN L. CUPP, :
Plaintiff, : Docket No. 2744 of 2007
vs. :
CEDAR SHOPPING CENTERS, INC. :
and HRI, INC., :
Defendants. :
:

CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Miller, Kistler, Campbell, Miller, Williams & Benson, Inc., do hereby certify that on this 1st day of June, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
316 Main Street
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER, & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire

FILED

JUN 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

APPEAL NUMBER 100-000000
COURT OF APPEAL FOR ONTARIO
LAW COURTS
123 College Street
Toronto, Ontario
M5C 1A1
Telephone: (416) 210-6300
Facsimile: (416) 210-6301

APPEAL NUMBER 100-000000
COURT OF APPEAL FOR ONTARIO
LAW COURTS
123 College Street
Toronto, Ontario
M5C 1A1
Telephone: (416) 210-6300
Facsimile: (416) 210-6301

ROBERT J. KLINE,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Action - Law

*

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* Number 2008 - 01586 C.D.

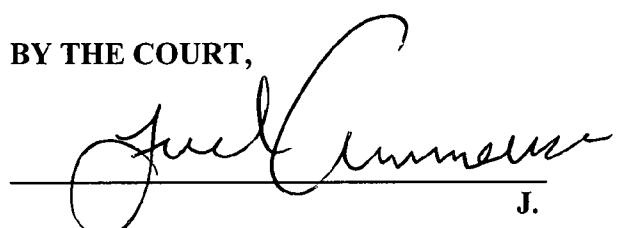
ORDER

AND NOW, June 3rd, 2009, the

Defendant, Christopher Stott, having filed a Motion to Compel;

IT IS HEREBY ORDERED that the Plaintiff is directed to file and serve full and complete answers to the Defendant, Christopher Stott's, First Set of Interrogatories and First Set of Request for Production of Documents within twenty (20) days. If full and complete answers to the Interrogatories and Request for Production of Documents are not filed and served within said time, the Court will impose appropriate sanctions upon Motion of the Defendant.

BY THE COURT,



J.

FILED
04/06/09 10C
JUN 03 2009 Atty Harper

William A. Shaw
Prothonotary/Clerk of Courts



FILED

JUN 03 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 6/3/09

- 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 _____ Other
 Special Instructions:

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 2008 - 01586 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant,
Christopher Stott

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

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

S
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JUN 09 2009
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2009

William A. Shaw
Prothonotary/Clerk of Courts
WAS

ROBERT J. KLINE,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

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

*

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* Number 2008 - 01586 C.D.

CERTIFICATE OF SERVICE

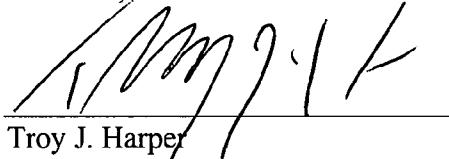
I certify that a certified copy of the Court Order dated June 3, 2009, granting the
Defendant, Christopher Stott's, Motion to Compel was served upon the following on the 8th
day of June, 2009, by mailing the same, by United States Mail, First Class, Postage Prepaid,
addressed to the following:

James D. Dennison, Esquire
DENNISON LAW OFFICES
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825
(Counsel for Plaintiff)

David B. Consiglio, Esquire
CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.
720 S. Atherton Street
State College, PA 16801
(Counsel for the Defendants, HRI, Inc. and
Diana Rice)

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR.,	:	
Plaintiff,	:	Docket No. 2008-01586 C.D.
vs.	:	Type of Case:
CHRISTOPHER STOTT, individually, and HRI, INC., and DIANA RICE, individually and as an agent or employee of HRI, INC.,	:	Civil Action
Defendants.	:	Type of Pleading:
	:	Defendants HRI, Inc. and Diana Rice's Certificate Prerequisite to Service of Subpoena
	:	Filed on Behalf of Defendants HRI and Diana Rice
	:	Counsel of Record for This Party
	:	David B. Consiglio, Esquire Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc. 720 S. Atherton Street State College, PA 16801 (814) 234-1500

FILED NOCC
AUG 19 2009
10:48 AM
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
: Plaintiff, : Docket No. 2008-01586 C.D.
: vs. :
: CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
: Defendants. :

CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS
PURSUANT TO RULE 4009.22

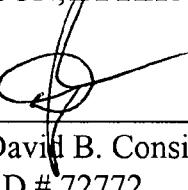
As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendant certifies that:

1. A notice of intent to serve subpoenas with a copy of the subpoenas attached thereto were mailed to each party at least twenty days prior to the date on which the subpoenas were sought to be served;
2. A copy of the notice of intent, including the proposed subpoenas, is attached to this certificate;
3. Plaintiff's counsel has consented to waive the twenty-day objection period; and

4. The subpoenas which are to be served are identical to the subpoenas which are attached to the notice of intent to serve subpoena.

Respectfully submitted,

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: August 18, 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR., :
: :
Plaintiff, : Docket No. 2008-01586 C.D.
: :
vs. : :
: :
CHRISTOPHER STOTT, individually, :
and HRI, INC., and DIANA RICE, :
individually and as an agent or employee of :
HRI, INC., :
: :
Defendants. : :

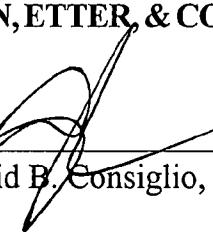
CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc., do hereby certify that on this 18th day of August, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
395 Main Street, Suite A
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER, & CONSIGLIO, INC.**

By: 

David B. Consiglio, Esquire

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW**

ROBERT J. KLINE, JR.,

Plaintiff, : Docket No. 2008-01586 C.D.

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants.

Type of Case:

Civil Action

Type of Pleading:

**Defendants HRI, Inc. and
Diana Rice's Notice of
Intent to Serve Subpoenas**

Filed on Behalf of Defendants HRI
and Diana Rice

Counsel of Record for This Party

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 S. Atherton Street
State College, PA 16801
(814) 234-1500

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR.,

Plaintiff, : Docket No. 2008-01586 C.D.

vs. :

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants. :

NOTICE OF INTENT TO SERVE SUBPOENAS
TO PRODUCE DOCUMENTS AND THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.21

Defendant intends to serve subpoenas identical to the ones that are attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoenas. If no objection is made the subpoenas may be served.

CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.

By: 

David B. Consiglio, Esquire
I.D.# 72772
720 South Atherton Street
State College, PA 16801
(814) 234-1500

Date: July 23, 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR.,

Plaintiff, : Docket No. 2008-01586 C.D.

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee of
HRI, INC.,

Defendants. :

CERTIFICATE OF SERVICE

I, David B. Consiglio, Esquire, of Campbell, Miller, Williams, Benson, Etter & Consiglio, Inc., do hereby certify that on this 23rd day of July, 2009, a true and correct copy of the foregoing document was served on the following person by depositing the same in the United States Mail, postage prepaid, addressed as follows:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
395 Main Street, Suite A
Brookville, PA 15825

Troy J. Harper, Esquire
Dennison, Dennison & Harper
293 Main Street
Brookville, PA 15825-1291

**MILLER, KISTLER, CAMPBELL,
MILLER, WILLIAMS & BENSON, INC.**

By: 

David B. Consiglio, Esquire

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Gordon P. Clark, M.D., P.O. Box 992, Clearfield, PA 16830
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street

State College, PA 16801

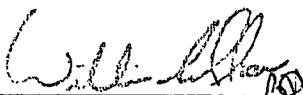
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 15, 2009

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

*

Vs.

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

*

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Phuong Wirths, D.O., 1541 Curwensville/Grampian Highway, Grampian, PA 16838
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertainning to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street
State College, PA 16801

TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, July 15, 2009

Seal of the Court

Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Keith L. Zeliger, D.O., 145 Hospital Avenue, DuBois, PA 15801
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street
State College, PA 16801

TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

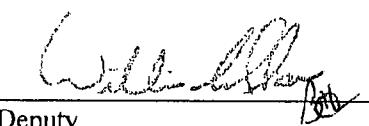
ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, July 15, 2009

Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Neeraj Dubey, M.D., 145 Hospital Avenue, DuBois, PA 15801

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street
State College, PA 16801

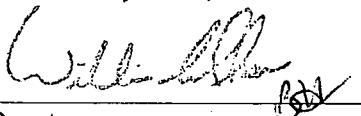
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: David Johne, M.D., 761 Johnsonburg Road, Suite 210, St. Marys, PA 15857
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street
State College, PA 16801

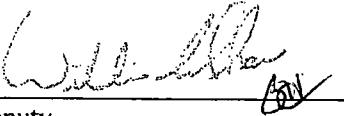
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield, PA

DATE: Wednesday, July 15, 2009
Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

*

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Jodi Grimminger Domico, P.O. Box 335, Curwensville, PA 16833
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire
ADDRESS: 720 South Atherton Street

State College, PA 16801
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

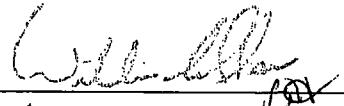
ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, July 15, 2009

Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

*

Vs.

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

*

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Holly Tkacik, PT, DPT, 465 State Street, Curwensville, PA 16833
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire
ADDRESS: 720 South Atherton Street

State College, PA 16801

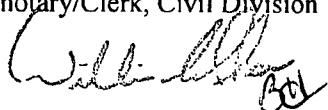
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

DATE: Wednesday, July 15, 2009
Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Thomas Sneeringer, D.O., 477 Rt. 28, Brookville, PA 15825
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc., pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire

ADDRESS: 720 South Atherton Street
State College, PA 16801

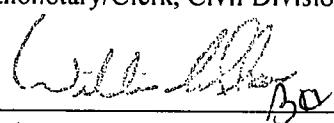
TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division



Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
Jan 2010
Clearfield, PA

DATE: Wednesday, July 15, 2009

Seal of the Court

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

*

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Mark W. Rodosky, M. D., 3200 South Water Street, Pittsburgh, PA 15203
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

Any and all medical records, films, studies, reports, etc.,
pertaining to Robert J. Kline, Jr.

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: David B. Consiglio, Esquire
ADDRESS: 720 South Atherton Street

State College, PA 16801

TELEPHONE: (814) 234-1500

SUPREME COURT ID # 72772

ATTORNEY FOR: Defendant HRI, Inc.

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Wednesday, July 15, 2009

Seal of the Court


Deputy

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

FILED

SEP 22 2009

mf q:30/w

William A. Shaw
Prothonotary/Clerk of Courts

No 4/C (GL)

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 1586 of 2008, C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,
Defendants

Type of Pleading: Certificate of Service

Filed on Behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually;
HRI, INC.; and DIANA RICE,
individually and as an agent or
employee of HRI, INC.,

Defendants.

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

*

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* Number 1586 - 2008 C. D.

CERTIFICATE OF SERVICE

I certify that I served Answers and Objections to Defendants HRI, Inc., and Diana Rice's Interrogatories (Set I) Directed to Defendant Stott, and Responses and Objections to Defendants HRI, Inc. and Diana Rice's Request for Production of Documents (Set I) Directed to Defendant Stott, on the 21st day of September, 2009, by United States Mail, First Class, postage prepaid, upon the Defendants, HRI, Inc. and Diana Rice, by sending an original and one copy of each document to their attorney, David B. Consiglio, Esq., 720 South Atherton Street, State College, PA 16801, and upon the Plaintiff, Robert J. Kline, Jr., by sending a copy of each document to his attorney, James D. Dennison, Esq., 395 Main Street, Suite A, Brookville, PA 15825.

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A. Shaw
Prothonotary/Clerk of Courts

SEP 22 2009

FILED

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Plaintiff

Filed on behalf of: Defendant,
Christopher Stott

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NO
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SEP 23 2009 GK

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of

* Clearfield County, Pennsylvania

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* Civil Action Law

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* Number 1586 - 2008 C.D.

NOTICE OF DEPOSITION

TO: ROBERT J. KLINE, JR.
c/o James D. Dennison, Esquire
DENNISON LAW OFFICES, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

Take notice that the deposition of **ROBERT J. KLINE, JR.** 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 Tuesday, October 27, 2009 at 9:00 a.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. 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:

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

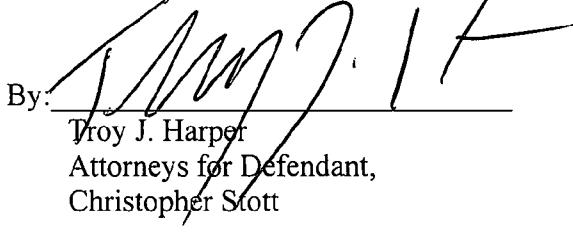
CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2009, a true and correct copy of the foregoing Notice of Deposition for Robert J. Kline, Jr. was mailed by United States mail, first class, postage prepaid, addressed to the following:

James D. Dennison, Esquire
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esquire
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

FILED

SEP 23 2009

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Certificate of Service

Filed on behalf of: Defendant, Christopher
Stott

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

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SEP 23 2009 CC
William A. Shaw
Prothonotary/Clerk of Courts
IS

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*
* Civil Division
*
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*
*
* Number 1586 - 2008 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one true and correct copy of the First Set of Interrogatories
Directed to Defendant, HRI, Inc., and the First Set of Request for Production of Documents
Directed to Defendant, HRI, Inc., were served on the 22nd day of
September, 2009, by United States Mail, First Class, Postage Prepaid,
addressed to the following:

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, Pennsylvania 16801
(Counsel for the Defendants, HRI, Inc. and Diana Rice)

and one certified copy to the following:

James D. Dennison, Esq.
Dennison Law offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, Pennsylvania 15825
(Counsel for the Plaintiff)

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

FILED

SEP 23 2009

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

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 1586 - 2008 C.D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Type of Pleading: Certificate of Service

Defendants.

Filed on behalf of: Defendant, Christopher
Stott

Counsel of Record for this Party:

Troy J. Harper
Supreme Court Number: 74753

John C. Dennison, II
Supreme Court Number: 29408

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

FILED NO
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SEP 23 2008
S

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of
HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Division

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* Number 1586 - 2008 C.D.

CERTIFICATE OF SERVICE

I certify that an original and one true and correct copy of the First Set of Interrogatories
Directed to Defendant, Diana Rice, and the First Set of Request for Production of Documents

Directed to Defendant, Diana Rice, were served on the 22nd day of

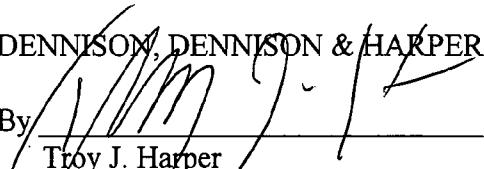
September, 2009, by United States Mail, First Class, Postage Prepaid,

addressed to the following:

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, Pennsylvania 16801
(Counsel for the Defendants, HRI, Inc. and Diana Rice)

and one certified copy to the following:

James D. Dennison, Esq.
Dennison Law offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, Pennsylvania 15825
(Counsel for the Plaintiff)

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for the Defendant,
Christopher Stott

FILED

SEP 23 2009

William A. Shaw
Prothonotary/Clerk of Courts

FILED

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William A. Shaw
Prothonotary/Clerk of Courts

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COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Imaging/Radiology Department,
100 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw LM
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Originals or copies of the following films and any and all associated records for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318:

- (1) 9/5/2006 x-rays of left shoulder;
- (2) 11/8/2006 x-ray orbits;
- (3) 11/8/2006 MRI of left shoulder;
- (4) 3/9/2007 MRI of head;
- (5) 2/12/2007 MRI of cervical spine.

CERTIFICATE OF SERVICE

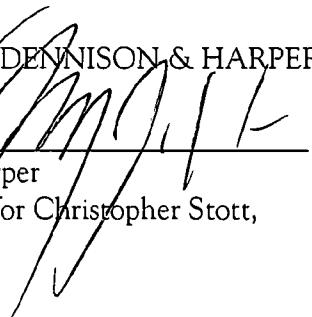
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Christopher Stott,
Defendant

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William A. Shaw

Prothonotary/Clerk of Courts

no C1

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

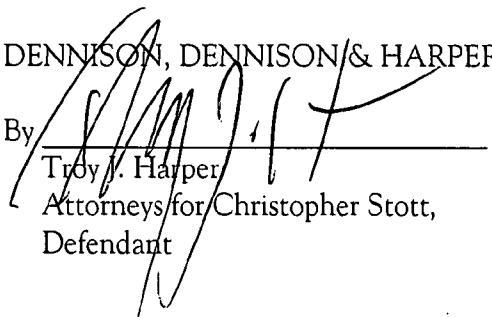
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC-Southside, Outpatient Center, 2000 Mary Street,
Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

CERTIFICATE OF SERVICE

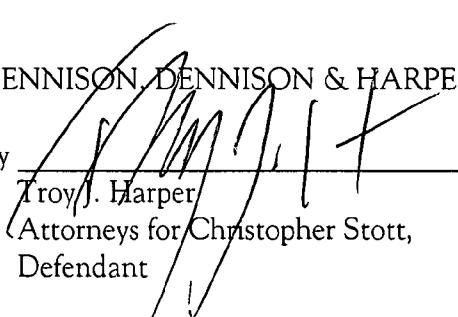
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A. Shaw
Prothonotary/Clerk of Courts

EB 02 2010

FILED

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5 FEB 02 2010

W/11:15/
William A. Shaw
Prothonotary/Clerk of Courts
no 46

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, The Village Chiropractors, 800 State Street, Curwensville,
PA 16833
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the [1st] day of [Feb. ,] 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A. Shaw
Prothonotary/Clerk of Courts

Feb 02 2010

FILED

FILED

FEB 02 2010

11:00 AM
William A. Shaw
Prothonotary/Clerk of Courts

No 4/1

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

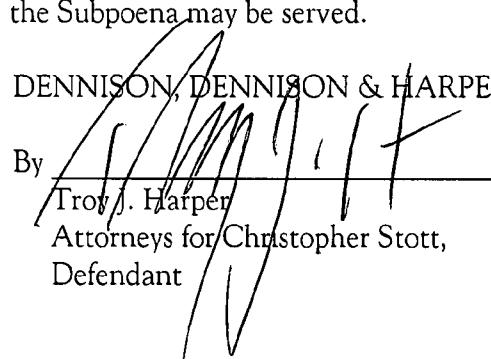
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Keith Zeliger, 145 Hospital Avenue, Medical Arts Building, Suite 311,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

CERTIFICATE OF SERVICE

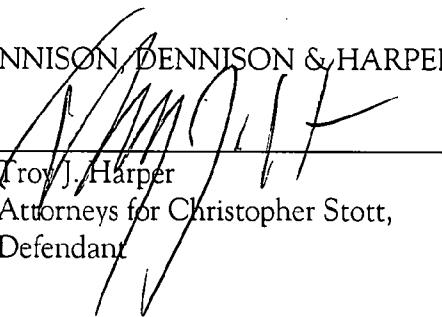
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of, Feb. , 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A. Shaw
Prothonotary/Clerk of Courts

FEB 02 2010

FILED

FILED

S FEB 02 2010

110:45(1)
William A. Shaw
Prothonotary/Clerk of Courts
No C1c

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, 145 Hospital Avenue, Suite 211, Medical Arts Building, DuBois, PA (Name of Person or Entity)
15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

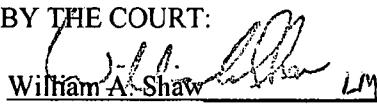
ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

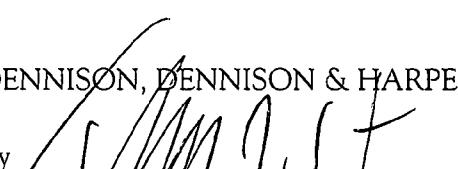
Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A Shaw
Prothonotary/Clerk of Courts

Feb 02 2010

FILED

FILED

FEB 02 2010

my 10-401c
William A. Shaw
Prothonotary/Clerk of Courts

no 4/c

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

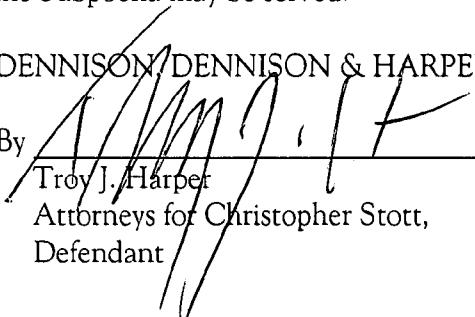
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.
Plaintiff(s)
Vs.
Christopher Stott
HRI, Inc.
Diana Rice
Defendant(s)

*

*

*

No. 2008-01586-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. David Johe, 761 Johnsonburg Road, Suite 210, St. Marys, PA 15857
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON DENNISON & HARPER
By Troy J. Harper
Attorneys for Christopher Stott,
Defendant

Prothonotary/Clerk of Courts
William A Shaw

Feb 02 2010

FILED

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

FILED
FEB 02 2010
m/10:40a
William A. Shaw
Prothonotary/Clerk of Courts
h.o. C/C

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

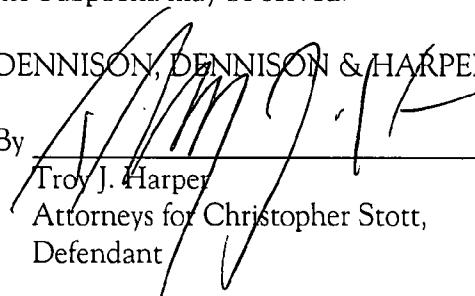
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
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* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.
Plaintiff(s)
Vs.
Christopher Stott
HRI, Inc.
Diana Rice
Defendant(s)

*

*

No. 2008-01586-CD

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Center for Sports Medicine, 3200 South Water Street,
Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street
Brookville, PA 15825
TELEPHONE: (814) 849-8316
SUPREME COURT ID # 74753
ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

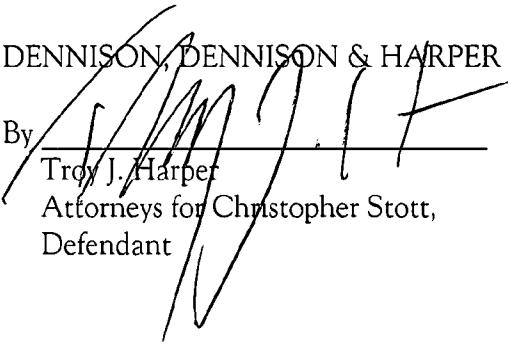
Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

William A. Shaw
Prothonotary/Clerk of Courts

Feb 02 2010

FILED

FILED

FEB 02 2010
m 10:30/
William A. Shaw
Prothonotary/Clerk of Courts
No C/C

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

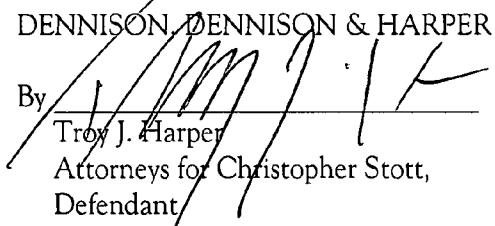
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

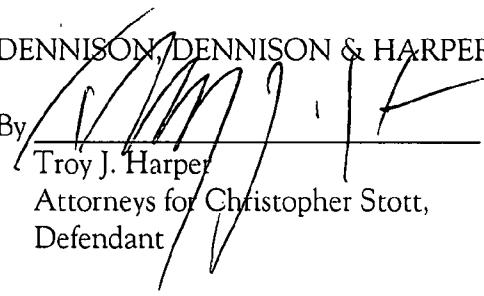
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb. 1, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

Prothonotary/Clerk of Courts
William A. Shaw

Feb 02 2010

FILED

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NOCC.

9:52AM
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
Penn Township Health Center
1541 Curwensville/Grampian Highway
Grampian, PA 16838

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of the Records Custodian for Penn Township Health Center, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

HRI, Inc.

Diana Rice

Defendant(s)

*

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Penn Township Health Center, 1541 Curwensville/Grampian Highway, Grampian, PA 16828
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

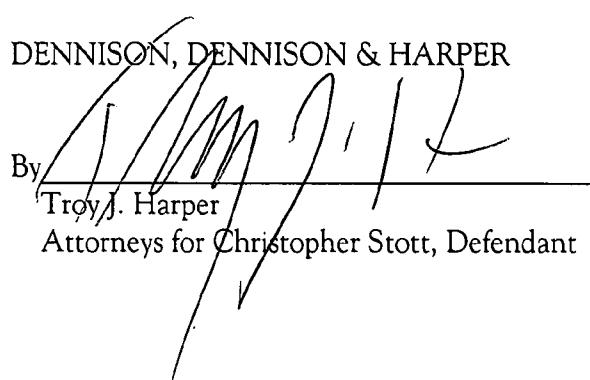
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 24th day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
Penn Township Health Center
1541 Curwensville/Grampian Highway
Grampian, PA 16838

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott, Defendant

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NOCC.
M 19.52cm
FEB 23 2010
S William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DuBois Regional Medical Center
Imaging/Radiology Department
100 Hospital Avenue
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of the Records Custodian for DuBois Regional Medical Center, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

HRI, Inc.

Diana Rice

Defendant(s)

*

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Imaging/Radiology Department,
100 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw LM
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Originals or copies of the following films and any and all associated records for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318:

- (1) 9/5/2006 x-rays of left shoulder;
- (2) 11/8/2006 x-ray orbits;
- (3) 11/8/2006 MRI of left shoulder;
- (4) 3/9/2007 MRI of head;
- (5) 2/12/2007 MRI of cervical spine.

CERTIFICATE OF SERVICE

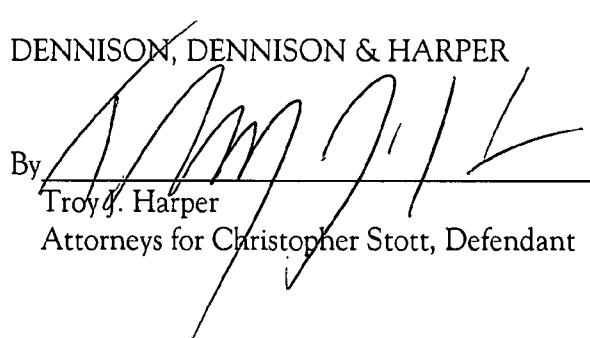
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DuBois Regional Medical Center
Imaging/Radiology Department
100 Hospital Avenue
DuBois, PA 15801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott, Defendant

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NOCC
m/9:52cm
FEB 23 2010
S
William A. Shaw
Prothonotary/Clerk of Courts
WAS

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

*

*

*

* Number 2008 - 1586 - C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
UPMC - Southside
Outpatient Center
2000 Mary Street
Pittsburgh, PA 15203

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of the Records Custodian for UPMC - Southside, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

HRI, Inc.

Diana Rice

Defendant(s)

*

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC-Southside, Outpatient Center, 2000 Mary Street,
Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to emergency room reports, patient charts, admission reports, discharge reports, physician's notes, nurse's notes, surgical reports, inpatient records, outpatient records, billing reports, lab reports, imaging reports, physical therapy records, correspondences, and originals or copies of all imaging studies.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

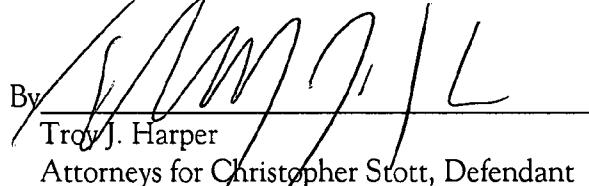
James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
UPMC - Southside
Outpatient Center
2000 Mary Street
Pittsburgh, PA 15203

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Christopher Stott, Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc

m19.52cm
FEB 23 2010

S
William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
The Village Chiropractors
800 State Street
Curwensville, PA 16833

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of the Records Custodian for The Village Chiropractors, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, The Village Chiropractors, 800 State Street, Curwensville,
PA 16833 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

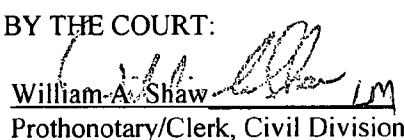
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw, L.M.
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318.

CERTIFICATE OF SERVICE

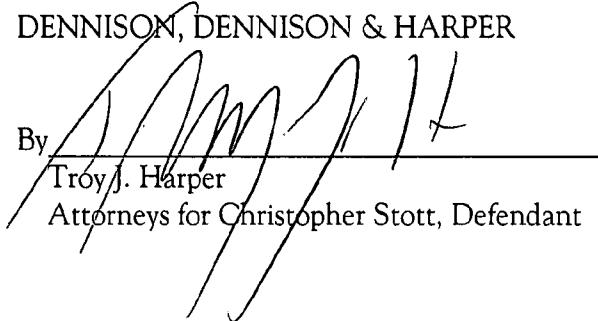
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 12 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
The Village Chiropractors
800 State Street
Curwensville, PA 16833

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott, Defendant

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No CC

3/9/2010
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
*
*
* Number 2008 - 1586 - C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Dr. Keith Zeliger
145 Hospital Avenue
Medical Arts Building
Suite 311
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of Dr. Keith Zeliger, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 82 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

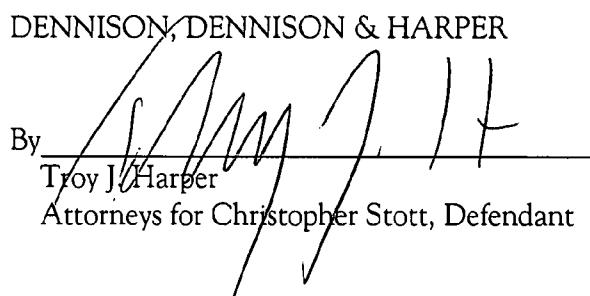
David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Dr. Keith Zeliger
145 Hospital Avenue
Medical Arts Building
Suite 311
DuBois, PA 15801

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Christopher Stott, Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No CC

1/9/2010
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

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* Number 2008 - 1586 - C. D.

NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY

TO: Records Custodian
DRMC Neurology
145 Avenue, Suite 211
Medical Arts Building
DuBois, PA 15801

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of Records Custodian for DRMC Neurology, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

HRI, Inc.

Diana Rice

Defendant(s)

*

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, 145 Hospital Avenue, Suite 211, Medical Arts Building, DuBois, PA (Name of Person or Entity)
15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

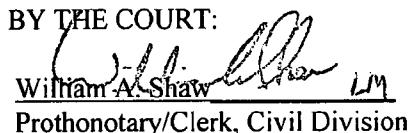
ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw LM
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
DRMC Neurology
145 Avenue, Suite 211
Medical Arts Building
DuBois, PA 15801

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Christopher Stott, Defendant

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,
Defendants.

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED ^{No cc}

m/9.52cm
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Dr. David Johe
761 Johnsonburg Road
Suite 210
St. Marys, PA 15857

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Christopher Stott, Defendant

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 C. D.

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.;
and DIANA RICE,

Type of Pleading: Notice of Deposition for
the Purpose of Copying Records Only

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No CC

m/9/53cm
FEB 23 2010

s
William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

*

*

*

*

* Number 2008 - 1586 - C. D.

**NOTICE OF DEPOSITION FOR THE PURPOSE
OF COPYING RECORDS ONLY**

TO: Records Custodian
UPMC Center for Sports Medicine
3200 South Water Street
Pittsburgh, PA 15203

PLEASE TAKE NOTE that the Defendant, Christopher Stott, will take the deposition of the Records Custodian for UPMC Center for Sports Medicine, twenty (20) days from the service of this Notice and attached Subpoena upon the same, at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825.

There will be no interrogation of the witness at this deposition since the deposition is for the purpose of copying records only. No attorneys are expected to be present. Deponent is directed to bring to this deposition copies of any and all documents as set forth on the attached Subpoena.

**DEPONENT IS ADVISED THAT IT IS SUFFICIENT TO PROVIDE THE
MATERIAL REQUESTED BY MAIL OR HAND DELIVERY IN LIEU OF APPEARING**

IN PERSON FOR THIS DEPOSITION, PROVIDED THAT THE DEPONENT
CERTIFIES THAT THE RECORDS WHICH HE SENDS ARE TRUE, ACCURATE
AND COMPLETE COPIES OF ALL OF THE RECORDS REQUESTED BY THE
ATTACHED SUBPOENA AND BY SIGNING THE CERTIFICATE OF COMPLIANCE
ATTACHED HERETO AND RETURNING THE SAME WITH THE RECORDS.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Center for Sports Medicine, 3200 South Water Street, Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

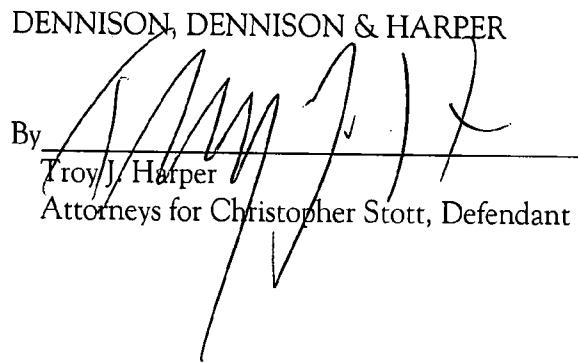
I certify that a true and correct copy of the foregoing Notice of Deposition was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

and by Certified Mail, Return Receipt Requested, on the following:

Records Custodian
UPMC Center for Sports Medicine
3200 South Water Street
Pittsburgh, PA 15203

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott, Defendant

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc
m/19/53 am
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

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*

* Number 2008 - 1586 - C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

CIVIL ACTION - LAW

Number 2008 - 1586 - CD

Type of Case: Civil Division

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, The Village Chiropractors, 800 State Street, Curwensville,
PA 16833
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

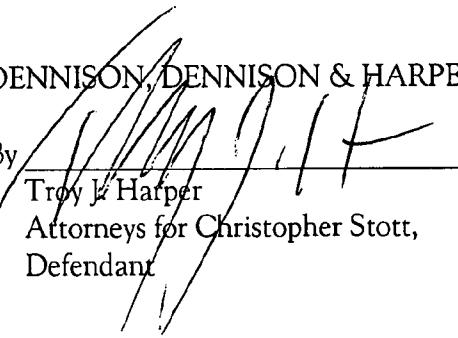
Any and all records in your possession for any chiropractic and/or therapy services, including but not limited to office notes, patient questionnaires, patient charts, reports, evaluations, consultations, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of **Feb.**, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

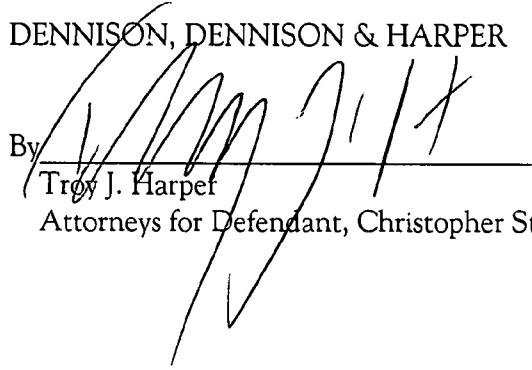
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 20 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc
m/9/53
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Court

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

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* Number 2008 - 1586 - C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

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* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
P.A.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott
HRI, Inc.
Diana Rice
Defendant(s)

*

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC-Southside, Outpatient Center, 2000 Mary Street, Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.
ADDRESS: 293 Main Street

Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

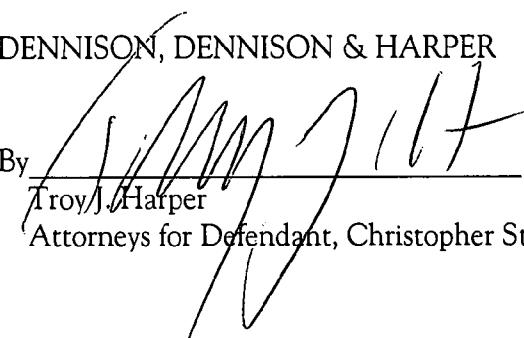
Deputy

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 21st day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc

1/19/53 am
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

*

*

*

* Number 2008 - 1586 - C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By _____
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DuBois Regional Medical Center, Imaging/Radiology Department,
100 Hospital Avenue, (Name of Person or Entity)
DuBois, PA 15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw LM
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Originals or copies of the following films and any and all associated records for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318:

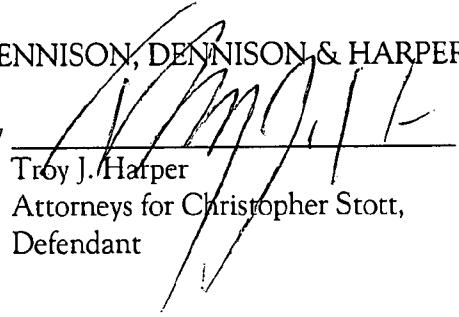
- (1) 9/5/2006 x-rays of left shoulder;
- (2) 11/8/2006 x-ray orbits;
- (3) 11/8/2006 MRI of left shoulder;
- (4) 3/9/2007 MRI of head;
- (5) 2/12/2007 MRI of cervical spine.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

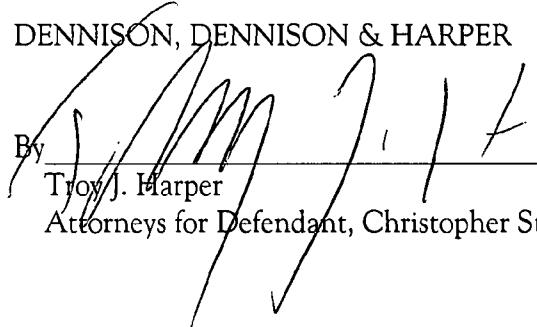
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc
1/19/53cm
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

*

*

*

* Number 2008 - 1586 - C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: February 22, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

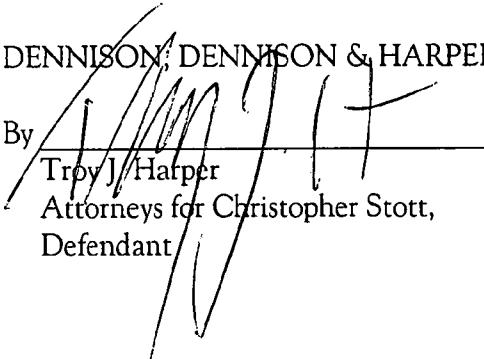
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, DRMC Neurology, 145 Hospital Avenue, Suite 211, Medical Arts Building, DuBois, PA (Name of Person or Entity)
15801

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

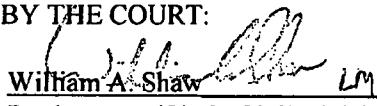
ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw LM
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

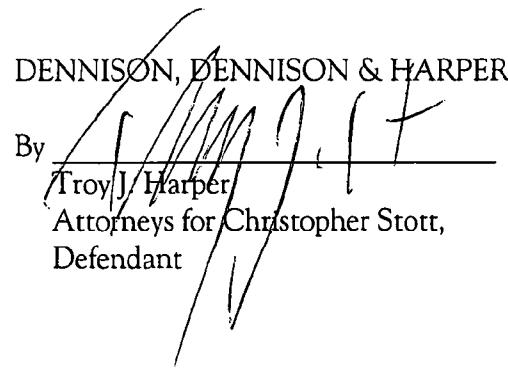
Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of **Feb.**, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

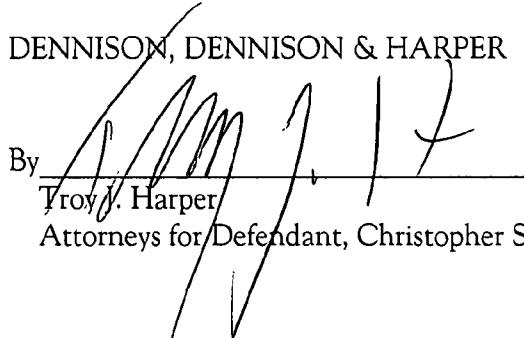
DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No CC

3/19/53 cm
FEB 23 2010

S
William A. Shaw
Prothonotary/Clerk of Courts


ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

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* Number 2008 - 1586 - C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

Dated: February 22, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

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* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. Keith Zeliger, 145 Hospital Avenue, Medical Arts Building, Suite 311,
DuBois, PA 15801 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to
produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by
this subpoena, together with the certificate of compliance, to the party making this request at the
address listed above. You have the right to seek in advance the reasonable cost of preparing the
copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty
(20) days after its service, the party serving this subpoena may seek a court order compelling you
to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

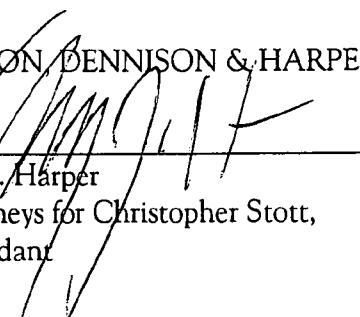
I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb. , 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By

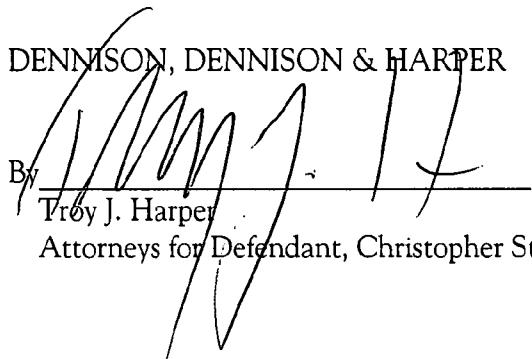

Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 20 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NOCC
m/9/63em

FEB 23 2010

S

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
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*
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*
* Number 2008 - 1586 - C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

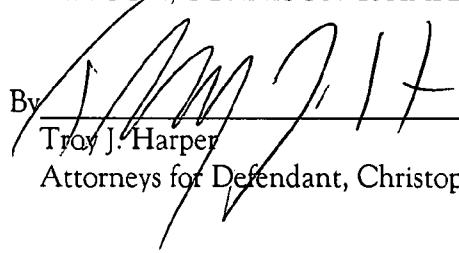
As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By


Troy J. Harper
Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

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*

* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, UPMC Center for Sports Medicine, 3200 South Water Street, Pittsburgh, PA 15203 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

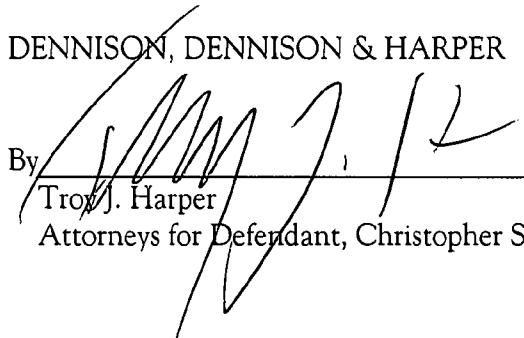
DENNISON, DENNISON & HARPER
By Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No CC.

19:53 am
FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

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*

*

* Number 2008 - 1586 - C. D.

CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

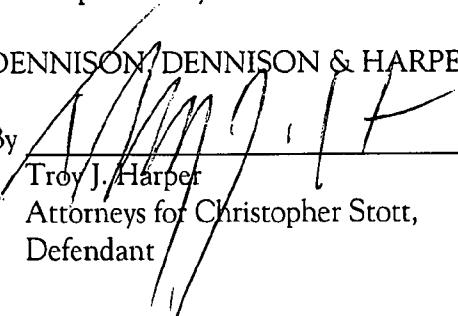
* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

*

Diana Rice

*

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Dr. David Jone, 761 Johnsonburg Road, Suite 210, St. Marys, PA 15857
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

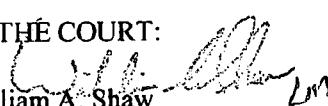
ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of Feb., 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

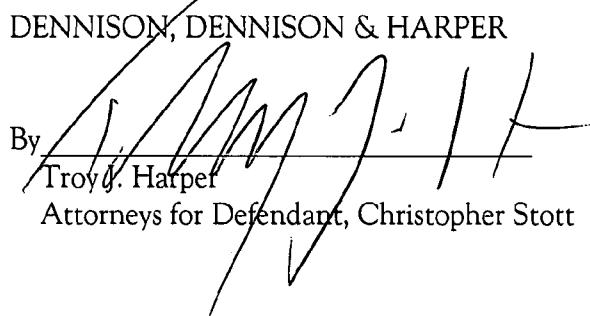
DENNISON, DENNISON & HARPER
By Troy J. Harper
Attorneys for Christopher Stott,
Defendant

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22nd day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,
Defendants.

Type of Pleading: Type of Pleading: Certificate
Prerequisite to Service of a Subpoena Pursuant to
Pa.R.C.P. 4009.22

Filed on behalf of: Christopher Stott
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED No cc

*m19:53cm
FEB 23 2010*

s William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

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

*

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*

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* Number 2008 - 1586 - C. D.

**CERTIFICATE PREREQUISITE TO SERVICE OF
A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22**

As a prerequisite to the Service of a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21, the Defendant, Christopher Stott, through his counsel, Dennison, Dennison & Harper, certifies the following pursuant to Pa.R.C.P. 4009.22:

1. A Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Pa.R.C.P. 4009.21 with a copy of the Subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the Subpoena is sought to be served;
2. A copy of the aforementioned Notice, including the proposed Subpoena, is attached to this Certificate;
3. No objection to the Subpoena has been received;

4. The Subpoena which will be served is identical to the Subpoena which is attached to the aforementioned Notice.

DENNISON, DENNISON & HARPER

By

Troy J. Harper

Attorneys for Defendant, Christopher Stott

Dated: February 22, 2010

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

CIVIL ACTION - LAW

Plaintiff,

Number 2008 - 1586 - CD

vs.

Type of Case: Civil Division

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Type of Pleading: Notice of Intent
to Serve Subpoena to Produce Documents
and Things for Discovery Pursuant to
Pa.R.C.P. 4009.21

Defendants.

Filed on behalf of: Christopher Stott,
Defendant

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT; HRI, INC.; and
DIANA RICE,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* Civil Action - Law
*
*
*
*
* Number 2008 - 1586 - C. D.

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
PA.R.C.P. 4009.21**

TO : ROBERT J. KLINE, JR., Plaintiff

Christopher Stott, by and through his attorneys, Dennison, Dennison & Harper, intends to serve a Subpoena identical to the one that is attached to this Notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the Subpoena. If no objection is made, the Subpoena may be served.

Dated: January 29, 2010

DENNISON, DENNISON & HARPER
By Troy J. Harper
Attorneys for Christopher Stott,
Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Robert J. Kline Jr.

*

Plaintiff(s)

Vs.

*

No. 2008-01586-CD

Christopher Stott

*

HRI, Inc.

Diana Rice

Defendant(s)

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.22

TO: Records Custodian, Penn Township Health Center, 1541 Curwensville/Grampian Highway, Grampian, PA 16828 (Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached

to Dennison, Dennison & Harper, 293 Main Street, Brookville, PA 15825
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Troy J. Harper, Esq.

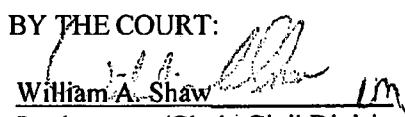
ADDRESS: 293 Main Street
Brookville, PA 15825

TELEPHONE: (814) 849-8316

SUPREME COURT ID # 74753

ATTORNEY FOR: Christopher Stott, Defendant

BY THE COURT:


William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Thursday, October 22, 2009

Seal of the Court

Deputy

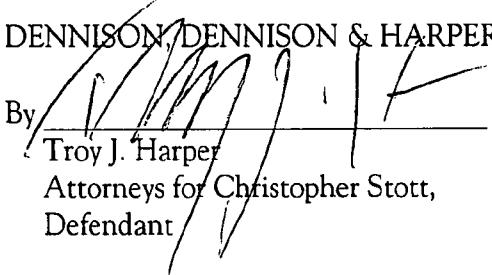
Any and all medical records in your possession for Robert J. Kline, Jr., DOB: 5/21/1967, SSN: 166-60-6318, including but not limited to physician's notes, nurse's notes, office notes, patient questionnaires, reports, evaluations, consultations, lab reports, patient charts, operative reports, therapy records, admission records, discharge records, correspondences, billing statements, and all imaging and x-ray reports and films for any care and/or treatment.

CERTIFICATE OF SERVICE

I certify that a certified copy of the foregoing Notice of Intent to Serve a Subpoena to Produce Documents and Things for Discovery Pursuant to Rule 4009.21 was served on the 1st day of **Feb.** , 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER
By 
Troy J. Harper
Attorneys for Christopher Stott,
Defendant

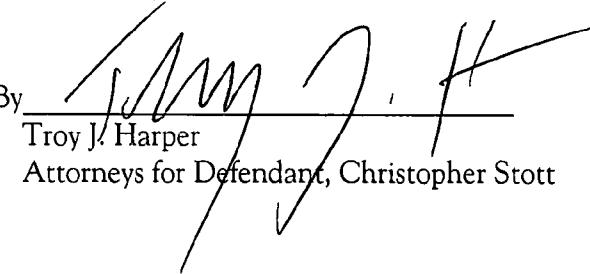
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Certificate Pursuant to Pa.R.C.P. 4009.22 was served on the 22 day of February, 2010, by United States Mail, First Class, postage prepaid, addressed to the following:

James D. Dennison, Esq.
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

David B. Consiglio, Esq.
Miller, Kistler & Campbell
720 South Atherton Street
State College, PA 16801

DENNISON, DENNISON & HARPER

By 
Troy J. Harper
Attorneys for Defendant, Christopher Stott

FILED

FEB 23 2010

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Defendant, Diana Rice

Filed on behalf of: Defendant,
Christopher Stott

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED

AUG 10 2010

William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Action Law

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* Number 1586 - 2008 C.D.

NOTICE OF DEPOSITION

TO: DIANA RICE

c/o David B. Consiglio, Esquire
CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.
720 South Atherton Street
State College, PA 16801-4669

Take notice that the deposition of **DIANA RICE** 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 Thursday, September 23, 2010, at 10:00 a.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. 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:

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of August, 2010, a true and correct copy of the foregoing Notice of Deposition for Diana Rice was mailed by United States mail, first class, postage prepaid, addressed to the following:

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 South Atherton Street
State College, PA 16801

James D. Dennison, Esquire
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By:

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

FILED

AUG 10 2010

William A. Straw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Kevin Etters

Filed on behalf of: Defendant,
Christopher Stott

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

FILED NO
S AUG 10 2010 CC
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William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

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

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* Number 1586 - 2008 C.D.

NOTICE OF DEPOSITION

TO: KEVIN ETTERS

c/o David B. Consiglio, Esquire
CAMPBELL, MILLER, WILLIAMS,
BENSON, ETTER & CONSIGLIO, INC.
720 South Atherton Street
State College, PA 16801-4669

Take notice that the deposition of **KEVIN ETTERS** 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 Thursday, September 23, 2010, at 11:30 a.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. 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:

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

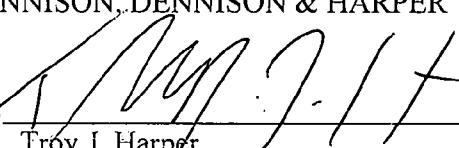
CERTIFICATE OF SERVICE

I hereby certify that on the 9/14 day of August, 2010, a true and correct copy of the foregoing Notice of Deposition for Kevin Etters was mailed by United States mail, first class, postage prepaid, addressed to the following:

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 South Atherton Street
State College, PA 16801

James D. Dennison, Esquire
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

FILED

AUG 10 2010

William A. Shaw
Prothonotary/Clerk of Courts

FILED

AUG 20 2010

W/10:10h
William A. Shaw
Prothonotary/Clerk of Courts

No C/C

(60)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

CIVIL ACTION - LAW

Number 1586 - 2008 C.D.

Type of Case: Civil Division

Type of Pleading: Notice of
Deposition of Chief Jeffrey Rhone

Filed on behalf of: Defendant,
Christopher Stott

Counsel of Record for this Party:
Troy J. Harper

Supreme Court Number: 74753

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

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually
and HRI, INC., and DIANA RICE,
individually and as an agent or employee
of HRI, INC.,

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
*

* Civil Action Law

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* Number 1586 - 2008 C.D.

NOTICE OF DEPOSITION

TO: Chief Jeffrey Rhone
Clearfield Borough Police Department
14 South Front Street
Clearfield, PA 16830

Take notice that the deposition of **CHIEF JEFFREY RHONE** 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 Thursday, September 23, 2010, at 1:30 p.m., at the law offices of Dennison, Dennison & Harper, 293 Main Street, Brookville, Pennsylvania 15825. 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:

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

CERTIFICATE OF SERVICE

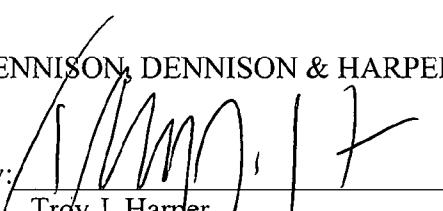
I hereby certify that on the 19th day of August, 2010, a true and correct copy of the foregoing Notice of Deposition for Chief Jeffrey Rhone was mailed by United States mail, first class, postage prepaid, addressed to the following:

Chief Jeffrey Rhone
Clearfield Borough Police
Department
14 South Front Street
Clearfield, PA 16830

David B. Consiglio, Esquire
Campbell, Miller, Williams,
Benson, Etter & Consiglio, Inc.
720 South Atherton Street
State College, PA 16801

James D. Dennison, Esquire
Dennison Law Offices, P.C.
Landmark Square
395 Main Street, Suite A
Brookville, PA 15825

DENNISON, DENNISON & HARPER

By: 

Troy J. Harper
Attorneys for Defendant,
Christopher Stott

William A. Shaw
Probationary Clerk of Courts

AUG 20 2010

FILED

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ROBERT J. KLINE, JR., * CIVIL DIVISION
*
* Plaintiff, * Number 2008-01586 C.D.
*
* vs. * Type of Pleading: **PRAECIPE FOR
WITHDRAWAL OF APPEARANCE
AND ENTRY OF APPEARANCE**
*
*
*
* Defendants, * Filed on behalf of:
* ROBERT J. KLINE, JR.
* Plaintiff
*
* Counsel of Record:
* JAMES D. DENNISON, ESQUIRE
*
* Supreme Court Number: 37589
*
* DENNISON LAW OFFICES, P.C.
* Landmark Square
* 395 Main Street, Suite A
* Brookville, PA 18525
* (814) 849-1237
* (814) 849-1242 FAX #
*
* Counsel for Defendants:
* DAVID B. CONSIGLIO, ESQUIRE
* TROY J. HARPER, ESQUIRE

5 FILED acc. AM
m/11/2010 SEP 07 2010
Dennison
BAC
William A. Shaw
Prothonotary/Clerk of Courts

ROBERT J. KLINE, JR.,

Plaintiff,

vs.

CHRISTOPHER STOTT, individually,
and **HRI, INC.**, and **DIANA RICE**,
individually and as an agent or employee
of **HRI, INC.**

Defendants.

* In the Court of Common Pleas of
* Clearfield County, Pennsylvania
* CIVIL DIVISION
*

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* Number 2008-01586 C.D.

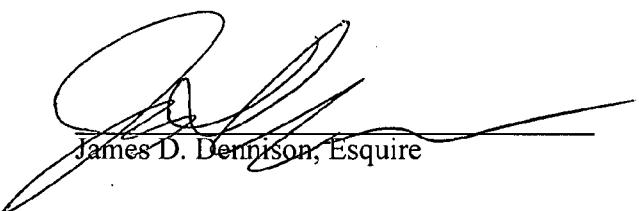
PRAECIPE

TO THE HON. JUDGE, PROTHONOTARY:

Please withdraw our appearance on behalf of Robert J. Kline, Jr., Plaintiff in the above-captioned action.

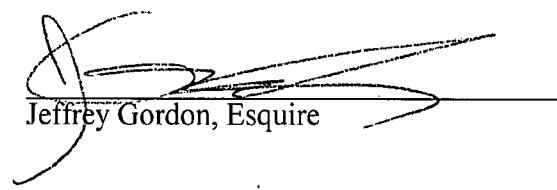
DENNISON LAW OFFICES, P.C.

Date:


James D. Dennison, Esquire

Please enter my appearance on behalf of Robert J. Kline, Jr., Plaintiff in the above-captioned action.

Date:


Jeffrey Gordon, Esquire

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ROBERT J. KLINE, JR.,

Plaintiff

v.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of HRI, INC.,

Defendants

CIVIL ACTION - LAW

2008
No. 1586 - 2018 C.D.

Type of Pleading:
**Praecipe to Settle and
Discontinue**

Filed on Behalf of:
Plaintiff

Counsel of Record for this Party:
Jeffrey M. Gordon, Esquire
Supreme Court No. 55835
152 Jefferson Street
Brookville, PA 15825
(814) 849-6800

5 **FILED** 2cc & 2
11/18/2012 *cut off disc*
FEB 22 2012 *issued to*
WAG *Jeffrey Gordon*
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL ACTION - LAW

ROBERT J. KLINE, JR.,

Plaintiff

v.

No. 1586 - 2008 C.D.

CHRISTOPHER STOTT, individually, and
HRI, INC., and DIANA RICE, individually
and as an agent or employee of HRI, INC.,

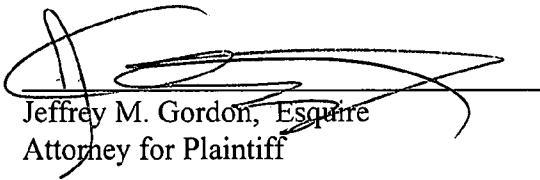
Defendants

PRAECIPE TO SETTLE AND DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above-entitled case settled and discontinued.

Respectfully submitted:


Jeffrey M. Gordon, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Robert J. Kline Jr.

vs.

No. 2008-01586-CD

**Christopher Stott
HRI, Inc.
Diana Rice**

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 February 22, 2012, marked:

Settled and discontinued

Record costs in the sum of \$95.00 have been paid in full by Robert J. Kline Jr.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 22nd day of February A.D. 2012.



lm

William A. Shaw, Prothonotary