

08-1932-CD
Cen-Clear Child Ser. Vs Brad Spencer al.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Cen-Clear Child Services, Inc.
(Plaintiff)

CIVIL ACTION

1633 Phillip - Big Hwy
(Street Address)

No. CV-08-1932-CJ
CV-0000238-08

Philipshurg PA 16866
(City, State ZIP)

Type of Case: Civil Action

Type of Pleading: Not Guilty

VS.

Allshouse, Malynda, ET AL.
(Defendant)

Filed on Behalf of:

(Plaintiff/Defendant)

112 N. Hill St. Apt/STE A1
(Street Address)

Coalport, PA 16227
(City, State ZIP)

Brad Spencer
(Filed by)

111 Moss Creek Dr. Portage PA 15946
(Address)

814-932-1117
(Phone)

Brad Spencer
(Signature)

FILED Def. pd. \$5.00

013143801
OCT 09 2008

Copies to: Piff

William A. Shaw
Prothonotary/Clerk of Courts

Def. Spencer
Mrs. Rudella

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____; SS

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the Magisterial District Judge designated therein on
(date of service) _____, 20_____, by personal service by (certified) (registered) mail,
sender's receipt attached hereto, and upon the appellee, (name) _____ on
_____, 20_____, by personal service by (certified) (registered) mail,
sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS _____ DAY OF _____, 20____

Signature of official before whom affidavit was made

Signature of affiant

Title of official

My commission expires on

44-63183

AOPC 312A-05

COMMONWEALTH OF PENNSYLVANIA

COURT OF COMMON PLEAS

Judicial District, County Of

46th

NOTICE OF APPEAL

FROM
MAGISTERIAL DISTRICT JUDGE JUDGMENTCOMMON PLEAS No. 08-1932-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the Magisterial District Judge on the date and in the case referenced below.

NAME OF APPELLANT <u>Bradford J Spencer</u>	MAG. DIST. NO. <u>46-3-03</u>	NAME OF MDJ <u>Michael A Bucklin</u>
ADDRESS OF APPELLANT <u>111 Moss Creek Dr.</u>	CITY <u>Portage</u>	STATE <u>PA</u>
DATE OF JUDGMENT <u>9/09/08</u>	IN THE CASE OF (Plaintiff) <u>Cen-Clear Child Services, Inc.</u>	(Defendant) <u>McLynda Allsionse, et al.</u>
DOCKET NO. <u>CV-0000238-08</u>	SIGNATURE OF APPELLANT OR ATTORNEY OR AGENT <u>Bradford J Spencer</u>	
<p>This block will be signed ONLY when this notation is required under Pa. R.C.P.D.J. No. 1008B.</p> <p>This Notice of Appeal, when received by the Magisterial District Judge, will operate as a SUPERSEDEAS to the judgment for possession in this case.</p> <p>If appellant was Claimant (see Pa. R.C.P.D.J. No. 1001(6) in action before a Magisterial District Judge, A COMPLAINT MUST BE FILED within twenty (20) days after filing the NOTICE of APPEAL.</p>		
Signature of Prothonotary or Deputy		

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.D.J. No. 1001(7) in action before Magisterial District Judge. IF NOT USED, detach from copy of notice of appeal to be served upon appellee.

PRAECIPE: To Prothonotary

Enter rule upon Bradford Spencer appellee(s), to file a complaint in this appeal

(Name of appellee(s))

(Common Pleas No. 08-1932-CD within twenty (20) days after service of rule or suffer entry of judgment of non pros.Bradford J Spencer Signature of appellant or attorney or agentRULE: To Cen-Clear Child Services Inc. appellee(s)

(Name of appellee(s))

OWNER

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time JUDGMENT OF NON PROS MAY BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of the mailing.

Date October 9, 2008Willie L. Brown Signature of Prothonotary or Deputy

(5)

YOU MUST INCLUDE A COPY OF THE NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH THIS NOTICE OF APPEAL.

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____; SS _____

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the Magisterial District Judge designated therein on
(date of service) _____, 20_____, by personal service by (certified) (registered) mail,
sender's receipt attached hereto, and upon the appellee, (name) _____ on
_____, 20_____, by personal service by (certified) (registered) mail,
sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS _____ DAY OF _____, 20_____

Signature of official before whom affidavit was made

Signature of affiant

Title of official

My commission expires on _____, 20_____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-03

MDJ Name: Hon.

MICHAEL A. RUDELLA

Address: **131 ROLLING STONE ROAD
PO BOX 210
KYLERTOWN, PA**

Telephone: **(814) 345-6789 16847-0444**

**BRADFORD SPENCER
111 MOSS CREEK DR.
PORTAGE, PA 15946**

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

**CEN-CLEAR CHILD SERVICE, INC.
1633 PHILIP.-BIG.HWY
PHILIPSBURG, PA 16866**

NAME and ADDRESS

DEFENDANT:

**ALLSHOUSE, MALYNDA, ET AL.
112 N. HILL ST. APT/STE A1
COALPORT, PA 16627**

NAME and ADDRESS

Docket No.: **CV-0000238-08**
Date Filed: **8/19/08**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **9/09/08**

<input checked="" type="checkbox"/> Judgment was entered for: (Name) CEN-CLEAR CHILD SERV, ICE, INC	<table border="1"><tr><td>Amount of Judgment</td><td>\$ 680.00</td></tr><tr><td>Judgment Costs</td><td>\$ 87.00</td></tr><tr><td>Interest on Judgment</td><td>\$.00</td></tr><tr><td>Attorney Fees</td><td>\$.00</td></tr><tr><td>Total</td><td>\$ 767.00</td></tr><tr><td>Post Judgment Credits</td><td>\$ _____</td></tr><tr><td>Post Judgment Costs</td><td>\$ _____</td></tr><tr><td colspan="2">Certified Judgment Total \$ _____</td></tr></table>	Amount of Judgment	\$ 680.00	Judgment Costs	\$ 87.00	Interest on Judgment	\$.00	Attorney Fees	\$.00	Total	\$ 767.00	Post Judgment Credits	\$ _____	Post Judgment Costs	\$ _____	Certified Judgment Total \$ _____	
Amount of Judgment		\$ 680.00															
Judgment Costs		\$ 87.00															
Interest on Judgment		\$.00															
Attorney Fees		\$.00															
Total		\$ 767.00															
Post Judgment Credits	\$ _____																
Post Judgment Costs	\$ _____																
Certified Judgment Total \$ _____																	
<input checked="" type="checkbox"/> Judgment was entered against: (Name) SPENCER, BRADFORD in the amount of \$ 767.00																	
<input type="checkbox"/> Defendants are jointly and severally liable.																	
<input type="checkbox"/> Damages will be assessed on Date & Time _____																	
<input type="checkbox"/> This case dismissed without prejudice.																	
<input type="checkbox"/> Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ _____																	
<input type="checkbox"/> Portion of Judgment for physical damages arising out of residential lease \$ _____																	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

9-9-08 Date M. A. Rudella, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date _____, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

DATE PRINTED: **9/10/08 10:05:00 AM**

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-03

MDJ Name: Hon.

MICHAEL A. RUDELLA

Address: **131 ROLLING STONE ROAD
PO BOX 210
KYLERTOWN, PA**

Telephone: **(814) 345-6789**

16847-0444

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

CEN-CLEAR CHILD SERVICE, INC.
1633 PHILIP.-BIG.HWY
PHILIPSBURG, PA 16866

NAME and ADDRESS

VS.

DEFENDANT:
ALLSHOUSE, MALYNDA, ET AL.
112 N. HILL ST. APT/STE A1
COALPORT, PA 16627

NAME and ADDRESS

FILED

MICHAEL A. RUDELLA
131 ROLLING STONE ROAD
PO BOX 210
KYLERTOWN, PA 16847-0444

OCT 15 2008

6/11/08 (a)
William A. Shaw
Prothonotary/Clerk of Courts

Docket No.: **CV-0000238-08**
Date Filed: **8/19/08**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF**

(Date of Judgment)

9/09/08

Judgment was entered for: (Name) **CEN-CLEAR CHILD SERV, ICE, INC**

Judgment was entered against: (Name) **SPENCER, BRADFORD**
in the amount of \$ **767.00**

Defendants are jointly and severally liable.

Damages will be assessed on Date & Time _____

This case dismissed without prejudice.

Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127
\$ _____

Portion of Judgment for physical damages arising out of
residential lease \$ _____

Amount of Judgment	\$ 680.00
Judgment Costs	\$ 87.00
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$ 767.00
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total \$ 767.00	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

9-9-08 Date

M A Rudella

, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

10/13/08 Date

M A Rudella

, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

DATE PRINTED: **9/10/08** 10:05:00 AM

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-03

MDJ Name: Hon.

MICHAEL A. RUDELLA
Address: **131 ROLLING STONE ROAD**
PO BOX 210
KYLERTOWN, PA

Telephone: **(814) 345-6789**

16847-0444

MICHAEL A. RUDELLA
131 ROLLING STONE ROAD
PO BOX 210
KYLERTOWN, PA 16847-0444

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

CEN-CLEAR CHILD SERVICE, INC.
1633 PHILIP. -BIG.HWY
PHILIPSBURG, PA 16866

NAME and ADDRESS

DEFENDANT:

ALLSHOUSE, MALYNDA, ET AL.
112 N. HILL ST. APT/STE A1
COALPORT, PA 16627

VS.

NAME and ADDRESS

Docket No.: **CV-0000238-08**
Date Filed: **8/19/08**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **9/09/08**

Judgment was entered for: (Name) **CEN-CLEAR CHILD SERV, ICE, INC**

Judgment was entered against: (Name) **ALLSHOUSE, JONATHAN**
in the amount of \$ **767.00**

Defendants are jointly and severally liable.

Damages will be assessed on Date & Time _____

This case dismissed without prejudice.

Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127
\$ _____

Portion of Judgment for physical damages arising out of
residential lease \$ _____

Amount of Judgment	\$ 680.00
Judgment Costs	\$ 87.00
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$ 767.00
Post Judgment Credits	\$ —
Post Judgment Costs	\$ —
Certified Judgment Total \$ 767.00	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

9-9-08

Date

M. A. Rudella

, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

10/13/08

Date

M. A. Rudella

, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-03

MDJ Name: Hon.

MICHAEL A. RUDELLA
Address: **131 ROLLING STONE ROAD**
PO BOX 210
KYLERTOWN, PA

Telephone: **(814) 345-6789**

16847-0444

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

CEN-CLEAR CHILD SERVICE, INC.
1633 PHILIP.-BIG.HWY
PHILIPSBURG, PA 16866

NAME and ADDRESS

DEFENDANT:

ALLSHOUSE, MALYNDA, ET AL.
112 N. HILL ST. APT/STE A1
COALPORT, PA 16627

VS.

NAME and ADDRESS

MICHAEL A. RUDELLA
131 ROLLING STONE ROAD
PO BOX 210
KYLERTOWN, PA 16847-0444

Docket No.: **CV-0000238-08**
Date Filed: **8/19/08**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF**

(Date of Judgment) **9/09/08**

Judgment was entered for: (Name) **CEN-CLEAR CHILD SERV, ICE, INC**

Judgment was entered against: (Name) **ALLSHOUSE, MALYNDA**
in the amount of \$ **767.00**

Defendants are jointly and severally liable.

Damages will be assessed on Date & Time _____

This case dismissed without prejudice.

Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127
\$ _____

Portion of Judgment for physical damages arising out of
residential lease \$ _____

Amount of Judgment	\$ 680.00
Judgment Costs	\$ 87.00
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$ 767.00
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total	\$ 767.00

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

9-9-08

Date

M. Rudella

, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

10/13/08

Date

M. Rudella

, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

DATE PRINTED: **9/10/08 10:04:00 AM**

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

CEN-CLEAR CHILD SERVICES, INC. * NO. 2008 - 1932
A Pennsylvania Corporation *
Plaintiff *

vs. *

BRADFORD J. SPENCER,
an individual *

Defendant *

* TYPE OF PLEADING: COMPLAINT

* FILED ON BEHALF OF:
Plaintiff *

* COUNSEL OF RECORD FOR
THIS PARTY:

* David C. Mason, Esquire
MASON LAW OFFICE
409 North Front Street
P.O. Box 28
Philipsburg, PA 16866
814-342-2240
I.D. No. 39180

FILED
09:35a.m. GK
OCT 29 2008

3cc Atty

S William A. Shaw
Prothonotary/Clerk of Courts

(60)

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

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed 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 AN LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

David C. Mason, Esquire

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

CEN-CLEAR CHILD SERVICES, INC. * NO. 2008 - 1932
A Pennsylvania Corporation *
Plaintiff *

vs. *

BRADFORD J. SPENCER,
an individual *

Defendant *

COMPLAINT

AND NOW, comes the Plaintiff, **CEN-CLEAR CHILD SERVICES, INC.**, a Pennsylvania business corporation, by and through its attorney, **DAVID C. MASON, ESQUIRE** and makes the following Complaint against the Defendant, and in support thereof avers as follows:

1. Plaintiff **CEN-CLEAR CHILD SERVICES, INC.**, is a Pennsylvania business corporation with its principal office or place of business at 1633 Philipsburg-Bigler Highway, Philipsburg, Clearfield County, Pennsylvania, 16866.
2. Defendant **BRADFORD J. SPENCER** is an individual with a mailing address of 111 Moss Creek Dr., Portage, Pennsylvania, 15946.
3. At all times material and relevant hereto, Plaintiff was a provider of mental health and social services to the public, and involved in the business of performing counseling,

therapy and other services to individuals with demonstrated needs.

4. Along with another individual named Malynda Allshouse, Defendant is the parent of a minor child, aged 7, who shall hereafter be referred to as "the minor".

5. On or about January 28, 2008, Plaintiff began treating "the minor".

6. The minor was designated as being in need of the services provided and performed by Plaintiff, **CEN-CLEAR CHILD SERVICES, INC.**

7. Malynda Allshouse arranged for this treatment and contracted with Plaintiff for the provision of services to "the minor", and represented to Plaintiff that Defendant would arrange for payment to Plaintiff through the insurance coverage available to "the minor".

8. The insurance coverage available for the treatment of "the minor" through Defendant's insurance carrier was denied due to the lack of a referral from "the minor's" primary care physician.

9. Despite repeated requests, Defendant neglected, failed and refused to obtain the said referral from the primary care physician, despite opportunities for doing so being open and available to him.

10. Defendant's failure to obtain the referral of "the minor" from the primary care physician was the direct and proximate cause of the loss of insurance reimbursement for the treatment Plaintiff rendered unto "the minor".

11. Defendant is the natural parent of "the minor" and, along with the mother of "the minor", responsible for payment of the ordinary and reasonable costs of care of said minor child.

12. Defendant is responsible for the mental health treatment received by "the

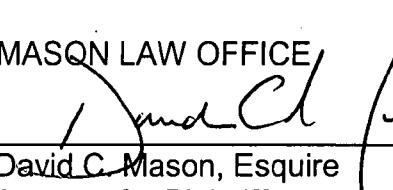
minor" under the doctrine of necessities.

13. Plaintiff's charges for the said care were ordinary and reasonable, and were the standard charges of Plaintiff for the type(s) of services provided.

14. Despite Plaintiff's repeated requests for payment, Defendant has failed and refused and continues to fail and refuse to make any payment whatsoever on the above referenced account.

WHEREFORE, Plaintiff demands that judgment be entered in its favor and against the Defendant in the amount of \$680.00, plus interest at the legal rate, plus costs of suit.

MASQN LAW OFFICE



David C. Mason, Esquire
Attorney for Plaintiff

VERIFICATION

I hereby verify that the answers set forth in the foregoing COMPLAINT are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

CEN-CLEAR CHILD SERVICES, INC

By: Janny Sipes

DATED: 10/28/8

VERIFICATION

I hereby verify that the answers set forth in this foregoing COMPLAINT are true and correct to the best of my knowledge, information and belief. This verification is made pursuant to the provisions of § 89-b, C.G. §4504, relating to numerous provisions

of authority of

GEN-CIBER CHILD SERVICES, INC

BY

FILED

OCT 29 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.

CIVIL ACTION - LAW

CEN-CLEAR CHILD SERVICES, INC. *
A Pennsylvania Corporation,

Plaintiff

VS.

BRADFORD J. SPENCER

Defendant

* No. 2008 - 1932

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.

CIVIL ACTION - LAW

CERTIFICATE OF SERVICE

I, DAVID C. MASON, Esquire, do hereby certify that I served a true and correct copy of COMPLAINT filed to the above captioned action, by placing the same in the United States mail, postage prepaid and addressed as follows:

Bradford J. Spencer
111 Moss Creek Dr.
Portage, PA 15946

MASON LAW OFFICE

DATED: Oct 30, 2008

By: David C. Mason, Esquire
Attorney for Plaintiff

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

CEN-CLEAR CHILD SERVICES, INC.*
A Pennsylvania Corporation, *
Plaintiff *
*
-vs- * No. 2008-1932-CD
*
*
BRADFORD J. SPENCER, *
an individual, *
Defendant *

FILED

DEC 19 2008

U/16:40/1
William A. Shaw
Prothonotary/Clerk of Courts

5 CENTS TO

AM

Type of Pleading:
Answer to Complaint

Filed on Behalf of:
Defendant

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

CEN-CLEAR CHILD SERVICES, INC.*
A Pennsylvania Corporation, *
Plaintiff *
*
-vs- * No. 2008-1932-CD
*
BRADFORD J. SPENCER, *
an individual, *
Defendant *

ANSWER TO COMPLAINT

AND NOW, comes the Defendant, Bradford J. Spencer, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Answer to Complaint and in support thereof, avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The minor child's birth date is November 24, 1995 and therefore the child is not age 7.
5. Denied. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averment and strict proof of said averment is demanded at the time of trial.
6. Denied. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

as to the truth of the averment and strict proof of said averment is demanded at the time of trial.

7. Denied. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averment and strict proof of said averment is demanded at the time of trial.

8. Denied. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averment and strict proof of said averment is demanded at the time of trial.

9. Denied. At no time did Defendant receive any request to obtain a referral from the primary care physician and in fact was completely unaware that the minor was receiving treatment, that money was owed and that suit was filed until after the hearing before the District Judge was held and default notice received.

10. Denied. At no time was the Defendant requested to obtain a referral for the minor and it was the minor's mother, Malynda Allshouse, who, pursuant to a Court Order, has primary physical custody of the minor child, who failed to contact the Defendant and request an appropriate referral.

11. Denied. Malynda Allshouse, the minor child's mother, has primary physical custody of the minor child and was the individual who took the child to Cen-Clear Child Services and

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

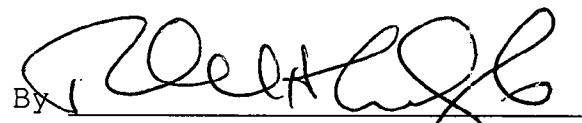
who was responsible for securing the proper documentation so that payment would be made. The Defendant was completely unaware that the minor was even going to Cen-Clear Child Services until judgment from the District Court was entered.

12. A conclusion of law to which no response is necessary.

13. Denied. After reasonable investigation, Defendant is without knowledge or information sufficient to form a belief as to the truth of the averment and strict proof of said averment is demanded at the time of trial.

14. Denied. As stated previously, at no time was any request made from Plaintiff until judgment from the District Court was entered.

WHEREFORE, the Defendant respectfully requests that the Plaintiff's Complaint be dismissed.

By 
Richard H. Milgrub, Esquire
Attorney for Defendant

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

VERIFICATION

I, Richard H. Milgrub, have read the foregoing

Answer to Complaint

The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

I am authorized to make this verification on behalf of

Defendant

because of my position as counsel of record.



Richard H. Milgrub

Dated: 12/18/08

ICHARD H. MILGRUB
TTONEY & COUNSELOR
AT LAW
1 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
1 NORTH BRADY STREET
DUBOIS, PA 15801

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

CEN-CLEAR CHILD SERVICES, INC.*
A Pennsylvania Corporation, *
Plaintiff *
*
-vs- * No. 2008-1932-CD
*
BRADFORD J. SPENCER, *
an individual, *
Defendant *

Type of Pleading:
Certificate of Service

Filed on Behalf of:
Defendant

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED NOV 01 2008
DEC 29 2008 (60)

William A. Shaw
Prothonotary/Clerk of Courts

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

CEN-CLEAR CHILD SERVICES, INC.*
A Pennsylvania Corporation, *
Plaintiff *
*
-vs- * No. 2008-1932-CD
*
BRADFORD J. SPENCER, *
an individual, *
Defendant *

CERTIFICATE OF SERVICE

I, Richard H. Milgrub, Esquire, do hereby certify that a certified copy of the Defendant's Answer to Complaint in the above-entitled matter was served upon the Plaintiff's attorney of record, David C. Mason, Esquire, PO Box 28, Philipsburg, Pennsylvania 16866 this 19th day of December, 2008, by depositing the same in the United States Postal Service, regular first-class postage prepaid mail.

By 
Richard H. Milgrub, Esquire
Attorney for Defendant

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801