

DOCKET NO. 173

NUMBER	TERM	YEAR
<u>446</u>	<u>February</u>	<u>1961</u>

Raymond B. Cover

VERSUS

Helen C. Watson

In the Court of Common Pleas of Clearfield, County, Pa.

Raymond B. Cover
vs
Helen C. Watson

No 446 Feb Term 1961

Complaint in Trespass

(Sheriffs Return)

Now, May 3, 1961 Deputized the Sheriff Of Indiana County to serve the within Complaint In Trespass on Helen C. Watson.

Now, June 17, 1961 served the within Complaint In Trespass on Helen C. Watson by deputizing the Sheriff of Indiana County., The return of service of Paul W. Jeffries, Sheriff Of Indiana County is hereto attached and made part of this return of service.

Costs Sheriff Ammerman \$6.00
Sheriff of Indiana County \$6.50
(Paid by Atty Lee)

So Answers,
Charles G. Ammerman
Charles G. Ammerman
Sheriff

Sworn to before me this 9th
day of August 1961 A.D.

Rev. J. Langston
Prothonotary.

And now June 17, 1961, at 10:40 A. M. (DST) served the within Complaint in Trespass on Helen C. Watson by personally handing to her a true and correct copy of the within Complaint and making known to her the contents thereof at her residence 400 North 9th Street, Indiana, Indiana County, Pennsylvania.

Sworn and subscribed to before
me this 12 day of June 1961.

So answers:

Paul H. O'Brien
Sheriff of Indiana County, Pa.

Costs \$6.50

My Commission Expires
First Monday in January, 1964

Know all men by these presents, That I, Charles F. Amerman,
High Sheriff of Clearfield County, State of Pennsylvania, do hereby depuitize Sheriff of Indiana,
County, Paul W. Jeffries to execute this writ; this deputation being made at the
request and risk of the Plaintiff.

Given under my hand and seal this 31st day of May

A. D. 1961.

Charles F. Amerman
Sheriff.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

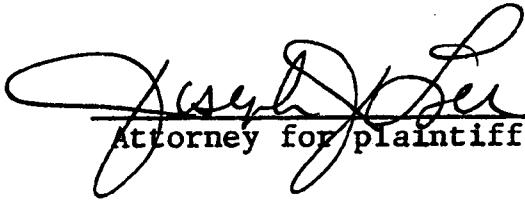
RAYMOND B. COVER :
VS : No. 446 February Term, 1961
HELEN C. WATSON : Trespass

P R A E C I P E

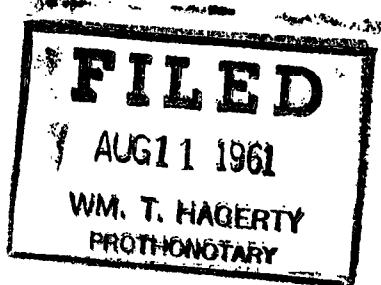
TO WILLIAM T. HAGERTY, PROTHONOTARY

SIR: DATED: C. M. 2020
RE: C. M. 2020

Please mark the above case discontinued.


Attorney for plaintiff

Dated: August 10, 1961



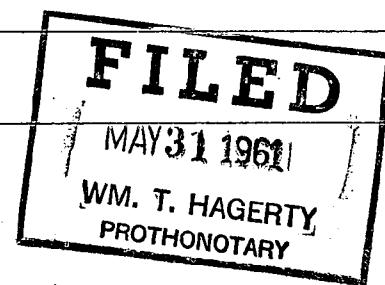
RECEIVED
IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

No. _____ Term _____ 19 _____

vs.

APPEARANCE

For _____



Raymond B. Cover | IN THE COURT OF COMMON PLEAS OF
VERSUS | CLEARFIELD COUNTY, PA.
Helen C. Watson |

No. 446 Term Feb. 1961

To: John T. Stoyert Prothonotary.

Sir: Enter appearance for Plaintiff the complainant in the
above matter

in above case.


Joseph J. Deinoff

Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

RAYMOND B. COVER : :

VS : No. 446 February Term, 1961

HELEN C. WATSON : Trespass

C O M P L A I N T

COMES NOW, the plaintiff, and by his attorney, Joseph J. Lee, brings this action in trespass against the defendant upon a cause whereof the following is a statement:

(1). The plaintiff, Raymond B. Cover, is an individual residing at 428 S. Eighth Street, Vincennes, Indiana.

(2). The defendant, Helen C. Watson, is an individual and resides at 400 N. Ninth Street, Borough of Indiana, Indiana County, Pennsylvania.

(3). On or about October 14, 1959 at approximately 6:10 P.M., the plaintiff was the owner of a 1957 Ford Fairlane automobile, and was operating the same on Pennsylvania Route 219 in a westerly direction in Clearfield County at a point approximately six miles southeast of the City of DuBois in the Village of Luthersburg, Brady Township, Clearfield County, Pennsylvania.

(4). The defendant was the operator of a 1959 Buick Sedan automobile, travelling in a southeasterly direction at the time and place aforesaid. As the two vehicles approached the intersection of Route 219 with Legislative Route 410, the defendant turned her vehicle from her own right lane of traffic directly into the left lane of traffic being then and there occupied by the plaintiff, causing the damages hereinafter complained of.

(5). The defendant was negligent as follows:

(a). In failing to observe the plaintiff's vehicle which was lawfully travelling in its own lane of traffic.

(b). In failing to yield the right-of-way to the plaintiff's vehicle in such case made and provided by the Vehicle Code.

(c). In turning directly into the path of the plaintiff's oncoming vehicle.

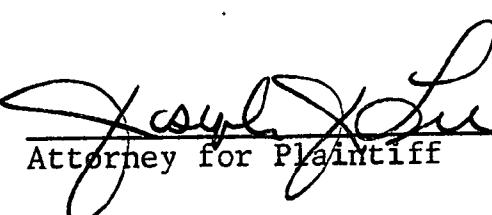
(d). In failing to maintain a proper lookout for other users of the highway, and more particularly the plaintiff herein.

(e). In failing to yield one-half of the highway to the oncoming car of the plaintiff.

(5). As the result of the defendant's negligence aforesaid, the plaintiff's vehicle collided with that of the defendant damaging extensively the left front thereof, the grille hood, headlights, radiator, and otherwise doing extensive damage thereto to an amount of \$481.56.

(6). The liability insurance carrier for the defendant's vehicle has paid the plaintiff \$40.00 for and toward the account of the damage to the plaintiff's vehicle - there thus remaining a total claim for Damages amounting to \$441.56.

WHEREFORE, plaintiff claims there is due and owing him the sum of \$441.56, together with interest thereon from October 15, 1959.



Attorney for Plaintiff

STATE OF *North Carolina* :SS
COUNTY OF *Wake* :

RAYMOND B. COVER, being duly sworn according to law, deposes and says that the facts set forth in the within Complaint are true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to before
me this *18* day of *March*, 1961.

MY COMMISSION EXPIRES MAY 18, 1962


(Raymond B. Cover)

APR 3 - 1961

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. ~~446~~, Feb. Term, 1961
Trespass

RAYMOND B. COVER

VS

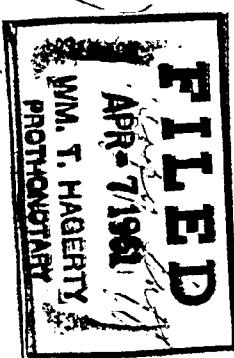
HELEN C. WATSON

C O M P L A I N T

TO THE WITHIN NAMED DEFENDANT:

You are hereby notified to
answer to the within Complaint
within twenty days from service
hereof.

Joseph J. Lee
Attorney for Plaintiff



JOSEPH J. LEE
ATTORNEY-AT-LAW
CLEARFIELD, PA.

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