

DOCKET NO. 174

NUMBER	TERM	YEAR
<u>594</u>	<u>May</u>	<u>1961</u>

William J. McKnight

VERSUS

Eugene Vallely

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

William J. McKnight  
vs  
Eugene Valley

No 594 May Term 1961

Complaint In Assumpsit

\*  
(Sheriffs Return)

Now, Sept 28, 1961 at 4:50 O'Clock P.M. served the within Complaint In Assumpsit on Eugene Valley at place of residence Hubert Street, Du Bois, Pa., by handing to Mrs Kathleen Valley an adult member of the family being the wife of Eugene Valley a true and attested copy of the original Complaint In Assumpsit and made known to her the contents thereof.

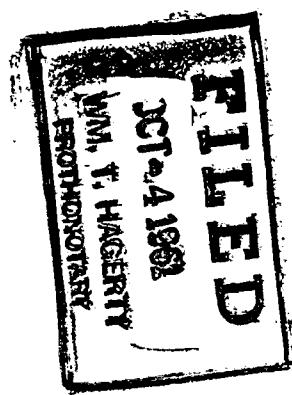
Costs Sheriff Ammerman \$13.10  
(Paid by Atty McKnight)

So Answers,

*Charles A. Ammerman*  
Charles G. Ammerman  
Sheriff

Sworn to before me this 29th  
day of Sept 1961 A.D.

*M. W. P. P. G.*  
M. W. P. P. G.  
Prothonotary.



IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

WILLIAM J. McKNIGHT

vs.

EUGENE VALLEY

:  
: NO. 5794 May Term, 1961  
:  
: In Assumpsit

COMPLAINT

1. Plaintiff is a member of the Bar of Jefferson County and of the Supreme Court of Pennsylvania.

2. On or about April 11, 1958, the defendant orally retained and employed the plaintiff to represent him in Jefferson County and his clients, heirs of the estate of Rose Wayne, in a suit then pending against Ralph McClure and Elmer McClure in the Court of Common Pleas of Jefferson County as of No. 13, August Term, 1958.

3. The plaintiff thereupon entered an appearance and undertook to prosecute the said cause of action in behalf of the defendant and his clients and represented them in the Courts of Jefferson County.

4. In that connection, plaintiff spent considerable time in conferences with attorneys for the defendants, prepared various Affidavits of Default, entered an Amicable Action of Ejectment, prepared various writs and a Praecept for Attachment Execution, incurred considerable expense in service of legal papers, and expended a large amount of time in legal research in pursuing the said claim.

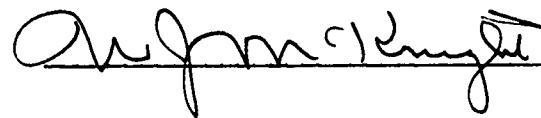
5. Plaintiff's services in the aforesaid matter terminated on or about February of 1960, whereupon he became entitled to a fee for his services and to reimbursement for the moneys expended by him.

6. The reasonable value of the services rendered by the plaintiff to the defendant, together with the amounts expended by plaintiff in aiding the defendant, is the sum of One Hundred Sixty-eight and 63/100ths Dollars (\$168.63), which is the customary charge of the plaintiff in like cases and is the fee the defendant agreed to pay.

7. An itemized schedule of the services performed and the expenses incurred is attached hereto, marked "Exhibit A" and made a part hereof.

8. Plaintiff has demanded of the defendant payment of the said sum of One Hundred Sixty-eight and 63/100ths Dollars (\$168.63), but defendant has consistently failed and declined to pay the same or any part thereof.

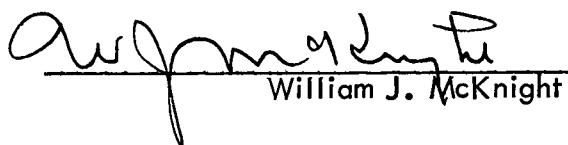
WHEREFORE, the plaintiff demands judgment against the defendant for One Hundred Sixty-eight and 63/100ths Dollars (\$168.63), with interest from the 15th day of February, 1960.



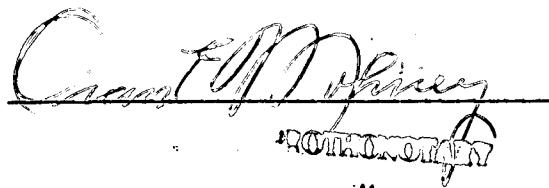
\_\_\_\_\_  
Attorneys for Plaintiff

STATE OF PENNSYLVANIA  
SS:  
COUNTY OF CLEARFIELD

William J. McKnight, being duly sworn according to law, deposes and says that he is the plaintiff in the within action and that the facts set forth in the foregoing complaint are true and correct.

  
\_\_\_\_\_  
William J. McKnight

Sworn to and subscribed before me  
this 2nd day of May, 1961.

  
\_\_\_\_\_  
ROTHMORIAN

My commission expires  
1st Monday of January 1962

EXHIBIT A

For Professional Services Rendered

4/11/58	Entering appearance in Rose Wayne et al. vs. McClure Coal Company	
9/22/58	Conference with Attorney Vallely, Attorney Aikman and Mr. Wayne	
9/24/58	Conference with Attorney Aikman	
9/25/58	Conference with Mr. Aikman and letter to Mr. Vallely	
8/6/59	Preparation of affidavit of default and entering amicable action of ejectment	
8/25/59	Consultation with Sheriff	
8/25/59	Telephone call to Attorney Simon	
8/26/59	Telephone call to Attorney Simon	
	Telephone call to Attorney Vallely	
	Conference with Sheriff and examination of records	
8/26/59	Consultation with Attorney Vallely	
8/26/59	Preparation of alias writ	
8/26/59	Letter to Sheriff	
9/14/59	Preparation of praecipe for attachment execution	
9/18/59	Conference with Sheriff	
9/18/59	Telephone to Mr. Vallely	
2/15/60	Satisfaction of judgments in settlement	
2/16/60	Telephone to Mr. Vallely and letter	\$108.73

Disbursements made on your behalf

	Thermo-fax copy of pleading	\$ .40
9/20/59	Sheriff's fees	32.50
9/20/59	Sheriff's fees	9.00
10/7/59	Sheriff's fees	34.00
2/15/60	Prothonotary's fees	1.00
		<u>\$185.63</u>
9/11/54	Refunded from Prothonotary	6.00
11/6/59	Refunded from Prothonotary	11.00
	GRANT TOTAL	<u>\$168.63</u>

No. 594, May Term, 1960  
In the Court of Common Pleas  
Of Clarion County, Pennsylvania

WILLIAM J. MCKNIGHT

vs.

EUGENE VALLEY

COMPLAINT

To the within defendant:

You are hereby notified to plead  
to the within Complaint within a  
period of twenty (20) days from the  
date of service hereof.

*William J. McKnight*  
Attnorneys for Plaintiff  
Sept. 25, 1960  
274  
WILLIAM J. MCKNIGHT  
ATTORNEY AT LAW  
BROOKVILLE, PENNSYLVANIA  
450  
Benn Knight

103

William J. McKnight, planter

## VERSUS

31 Eugene Valley, dept

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

No. 594 Term Ma. 1961

To Carl E. Walker

## Prothonotary.

Sir: Enter \_\_\_\_\_ appearance for \_\_\_\_\_

Enter judgment in favor of plaintiff for \$168.63 with interest  
from Feb 15, 1960 from failure of defendant to file an answer or  
pleading & judgment entered as aforesum within twenty (20) days  
in said action in Assumption.  
in above case.

je souhaite  
plutôt

Attorney for