

DOCKET NO. 174

NUMBER	TERM	YEAR
<u>758</u>	<u>May</u>	<u>1961</u>

Laura Irwin

VERSUS

John Wagoner

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 758 May Term 1961

LAURA IRWIN
80 Seward Street
Detroit, Michigan

vs.

JOHN WAGONER
Clearfield, Pennsylvania

COMPLAINT

Notice to the within Defendant:

You are hereby required to file an answer to the within pleading within 20 days of the date of service hereof.

Conrad J. Haggerty
Attorney for Plaintiff

FILED

Conrad J. Haggerty

AUG 16 1961

WM. T. HAGERTY
PROTHONOTARY
EUGENE GASKITKO
ATTORNEY AT LAW
KERNAGHAN & HAGERTY
CLEARFIELD, PA.

4/52 Dwy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LAURA IRWIN)
80 Seward Street)
Detroit, Michigan)
vs.) No. 758 May Term 1961
JOHN WAGONER) In Assumpsit
Clearfield, Pennsylvania)

COMPLAINT

NOW comes the Plaintiff by her attorney Eugene G. Kitko, Esquire and files the following as her cause of action:

1. The Plaintiff is Laura Irwin an individual residing at 80 Seward Street, Detroit, Michigan.
2. The Defendant is John Wagoner an individual residing in Clearfield, Pennsylvania.
3. On the 14th day of July 1956 the Plaintiff loaned to the Defendant the amount of \$600.00 in cash. This was in the form of a personal loan.
4. In December of 1958 the Plaintiff loaned to the Defendant the sum of \$500.00 in cash. This was also in the form of a personal loan.
5. No part of either loan has ever been repaid by the Defendant.
6. On or about April 1959 and at repeated times thereafter the Plaintiff has made demand on the Defendant for repayment of said loans but the Defendant has failed and refused to repay the same.

WHEREFORE, the Plaintiff asks judgment against the Defendant in the amount of \$1100.00 together with the penalty for delay in payment from April of 1959.

Eugene G. Kitko
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:

LAURA IRWIN, being duly sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

Laura Irwin

Sworn to and subscribed before me
this 16th day of August, 1961.

Tom Haggerty

PROTHONOTARY
My Commission Expires
1st Monday Jan. 1962