

**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
CIVIL TRIAL DIVISION**

<b>SHAUNTAE GIDDINGS, PLAINTIFF</b>  <b>VS.</b>  <b>WILLIE SHU, DEFENDANT</b>	<b>JULY TERM, 2013</b>  <b>NO. 1307 01767</b>
<b>PLASARD ALVAREZ AND VLADIMIR DUBUC AND ADONIS ELLIOTT, PLAINTIFFS</b>  <b>VS.</b>  <b>WILLIE SHU AND SHENG SHU-WANG AND SHAUNTAE GIDDINGS, DEFENDANTS</b>	<b>JANUARY TERM, 2014</b>  <b>NO. 1401 00702</b>

**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2014, it is hereby  
ORDERED that the above-captioned matters be consolidated for purposes including discovery,  
arbitration, trial and appeal pursuant to Pa. R.C.P. 213(a). Further, these cases will be  
consolidated for purposes of arbitration under January Term, 2014, No. 1401 00702 with an  
arbitration date September 25, 2014 at 9:15 am.

BY THE COURT:

\_\_\_\_\_  
J.

**Ronald Marrero, Esquire**

<b>Identification Number 87362 Robert J. Casey, Jr. &amp; Associates Centre Square West 1500 Market Street, Suite 2500 Philadelphia, PA 19102 (215) 841-3000</b>	<b>ATTORNEY FOR DEFENDANT, WILLIE SHU AND SHENG SHU-WANG</b>
<b>SHAUNTAE GIDDINGS, PLAINTIFF</b>  <b>VS.</b>  <b>WILLIE SHU, DEFENDANT</b>	<b>JULY TERM, 2013</b>  <b>NO. 1307 01767</b>
<b>PLASARD ALVAREZ AND VLADIMIR DUBUC AND ADONIS ELLIOTT, PLAINTIFFS</b>  <b>VS.</b>  <b>WILLIE SHU AND SHENG SHU-WANG AND SHAUNTAE GIDDINGS, DEFENDANTS</b>	<b>JANUARY TERM, 2014</b>  <b>NO. 1401 00702</b>

**MOTION OF DEFENDANT, WILLY SHU FOR CONSOLIDATION OF ACTIONS**

Defendant, Willy Shu and Sheng Shu-Wang, by and through their attorney, Ronald Marrero, Esquire, hereby request this Honorable Court, pursuant to Rule 213(a) of the Pennsylvania Rules of Civil Procedure, for an Order joining the above-captioned actions for all purposes including, but not limited to, discovery, arbitration, trial and appeal as follows:

1. The actions brought by all Plaintiffs arise out of the same July 8, 2012 automobile accident.
2. The above-captioned cases are based on theories of negligence.
3. The above actions all involve common questions of law and fact.
4. The first lawsuit filed, Giddings v. Shu, et al., PCCP1307 01767, is a negligence action brought to recover damages for personal injuries allegedly sustained in the July 8, 2012 motor vehicle accident. This is an Arbitration matter which is scheduled to be heard on

March 28, 2014 at 9:15 a.m. See Exhibit "A".

5. The second lawsuit filed, Alvarez et al v Shu et al., PCCP 1401 00702, is a personal injury action brought by Plaintiffs Plasard Alvarez, Vladimir Dubuc and Adonis Elliott, arising out of the same July 8, 2012 motor vehicle accident. This is an Arbitration matter scheduled to be heard on September 25, 2014 at 9:15 a.m. See Exhibit "B".
6. Consolidation of the above actions will not prejudice any substantial rights of any party to the actions and will alleviate the danger of inconsistent verdicts, and will avoid the cost and inconvenience of separate discovery, arbitrations and trials.

**WHEREFORE**, Defendants, Willy Shu and Sheng Shu-Weng, respectfully request this Honorable Court to consolidate the above-captioned actions for purposes of discovery, arbitration, trial and appeal by entering the Order in the form attached hereto.

BY: /s/  
Ronald Marrero, Esquire  
Attorney for **DEFENDANTS, WILLIE SHU AND  
SHENG SHU-WANG**

**Ronald Marrero, Esquire**

<b>Identification Number 87362 Robert J. Casey, Jr. &amp; Associates Centre Square West 1500 Market Street, Suite 2500 Philadelphia, PA 19102 (215) 841-3000</b>	<b>ATTORNEY FOR DEFENDANTS, WILLIE SHU AND SHENG SHU-WANG</b>
<b>SHAUNTAE GIDDINGS, PLAINTIFF  VS.  WILLIE SHU, DEFENDANT</b>	<b>JULY TERM, 2013  NO. 1307 01767</b>
<b>PLASARD ALVAREZ AND VLADIMIR DUBUC AND ADONIS ELLIOTT, PLAINTIFFS  VS.  WILLIE SHU AND SHENG SHU-WANG AND SHAUNTAE GIDDINGS, DEFENDANTS</b>	<b>JANUARY TERM, 2014  NO. 1401 00702</b>

**MEMORANDUM OF LAW IN SUPPORT OF  
MOTION TO CONSOLIDATE ACTIONS**

**I. MATTER BEFORE THE COURT**

Motion to consolidate the above captioned cases.

**II. STATEMENT OF QUESTION INVOLVED:**

**Question:** Whether these captioned actions should be consolidated for purposes of discovery, arbitration, trial and appeal?

**Suggested Answer:** Yes, the actions should be consolidated.

**III. STATEMENT OF FACTS**

These actions arise from a motor vehicle accident which occurred on July 8, 2012.

On July 11, 2013, Plaintiff, Shauntae Giddings brought an action against Defendant, Willy Shu to recover damages for personal injuries resulting from the July 8, 2012 accident. See

Exhibit "A".

On January 9, 2014, Plaintiffs, Plasard Alvarez, Vladimir Dubuc and Adonis Elliott filed a lawsuit against Defendants, Willy Shu, Sheng Shu- Wang, and Shaunte Giddings to recover damages for personal injuries resulting from the same July 8, 2012 accident. See Exhibit "B".

#### IV. ARGUMENT

Rule 213(a) of the Pennsylvania Rules of Civil Procedure provides as follows:

In actions pending in a county which involve a common questions of law or fact or which arise from the same transaction or occurrence, the court on its own motion or on the motion of any party may order a joint hearing or trial of any matter in issue in the actions, may order the actions be consolidated, and may make orders that avoid unnecessary cost or delay.

The above-captioned actions involve common questions of law and fact. All of these cases arise out of the same motor vehicle accident. All of the actions are based on theories of negligence. No theories of strict liability or strict products liability are involved.

To permit the lawsuits to remain separate would be to require the parties to unnecessarily engage in repetitive discovery and for two proceedings to take place, where a single proceeding would suffice. The Arbitration of these matters, as well as any further proceedings or conference, would be best achieved through consolidation of these actions. This motion for consolidation is entirely consistent with all the decided case law on the subject and with the respected commentators on the rules. See Hare v. American General Life Insurance Co., 43 D & C 2d 126 (1967). Also, in Anchor Motor Freight, Inc. v. Koser, 10 D & C 3d 497 (1979), the court consolidated an action instituted by plaintiff for personal injuries suffered in a motor vehicle action for property damage in order to prevent inconsistent verdicts, save time and expense for the parties involved and to promote judicial efficiency. See also, Leftheris v. Robinson, 37 D & C 2d 43 (Mercer 1965), where a personal injury action, pending as a jury

matter, and a property damage claim, listed as an Arbitration matter, arose out of the same accident, consolidation was ordered. Inconsistency of verdicts could result in a new trial being granted. Kessler v. Matlack, 210 Pa. Super 450; 233 A.2d 592 (1967).

The essential factor in favor of consolidation here is that there is absolutely no question that by consolidating these actions, there would be convenience for all parties, all matters can be scheduled at the convenience of all parties, and a trial dealing with all the issues arising out of the single occurrence can be had with cost and time savings by all concerned, especially the Court. Finally, consolidation would avoid the specter of inconsistent verdicts. Thus, under the circumstances, consolidation is appropriate and necessary.

**V. CONCLUSION**

For all the foregoing reasons, it is respectfully requested that all actions be consolidated for purposes of discovery, arbitration, trial and appeal.

Respectfully submitted,

BY: /s/  
Ronald Marrero, Esquire  
Attorney for DEFENDANTS, WILLIE SHU AND  
SHENG SHU-WANG

VERIFICATION

Ronald Marrero, **Esquire** deposes and says that he/she is the attorney for Defendants, Willie Shu and Sheng Shu- Wang in the within matter, and that he/she is authorized to take this Verification on the Defendant's behalf, and that the facts set forth in the foregoing **Motion for Consolidation of Actions** are true and correct to the best of his/her knowledge, information and belief, and that he/she takes this Affidavit pursuant to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATED: March 3, 2014

/s/

\_\_\_\_\_  
Ronald Marrero, Esquire  
Attorney for **DEFENDANTS, WILLIE SHU AND  
SHENG SHU-WANG**

**NOTICE**

All attorneys and staff of the law firm of Robert J. Casey, Jr. & Associates are employees of the Corporate Law Department of State Farm Mutual Automobile Insurance Company.

Respectfully submitted,

**ROBERT J. CASEY, JR. & ASSOCIATES**

/s/  
\_\_\_\_\_  
Ronald Marrero, Esquire  
Attorney ID#: 873622500 Centre Square West  
1500 Market Street  
Philadelphia, PA 19102  
PHONE NO. (215) 841-3000  
FAX NO. (215) 561-0331



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
CIVIL TRIAL DIVISION**

<b>SHAUNTAE GIDDINGS, PLAINTIFF VS. WILLIE SHU, DEFENDANT</b>	<b>JULY TERM, 2013  NO. 1307 01767</b>
<b>PLASARD ALVAREZ AND VLADIMIR DUBUC AND ADONIS ELLIOTT, PLAINTIFFS  VS.  WILLIE SHU AND SHENG SHU-WANG AND SHAUNTAE GIDDINGS, DEFENDANTS</b>	<b>JANUARY TERM, 2014  NO. 1401 00702</b>

**CERTIFICATION OF SERVICE**

I, Ronald Marrero, Esquire, hereby certify that a true and correct copy of the within Motion will be served to all counsel and unrepresented parties electronically by the E-Filing system or by regular mail or facsimile if counsel or the unrepresented party does not participate in E-Filing, on the date of E-Filing acceptance of the document.

By: /s/\_\_\_\_\_

Ronald Marrero, Esquire  
Attorney ID#: 87362  
2500 Centre Square West  
1500 Market Street  
Philadelphia, PA 19102  
PHONE NO. (215) 841-3000  
FAX NO. (215) 561-0331

Date: 3/3/14\_\_\_\_\_

# **EXHIBIT A**

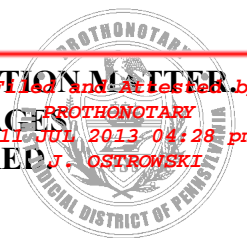
USTED ESTA ORDENADO COMPARECER EN Arbitration Hearing 1880 JFK Blvd. 5th fl. at 09:15 AM - 03/28/2014  
You must still comply with the notice below. USTED TODAVIA DEBE CUJPLIR CON EL AVISO PARA DEFENDERSE.  
This matter will be heard by a Board of Arbitrators at the time, date and place specified but, if one or more parties is not present at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties. There is no right to a trial de novo on appeal from a decision entered by a Judge.

**LAW OFFICES OF CRAIG A. ALTMAN, P.C.**

BY: DAVID F KWARTLER ESQUIRE

I.D. NO.: 205478  
19 South 21<sup>st</sup> Street  
Philadelphia, PA 19103  
(215) 569-4488

**THIS IS AN ARBITRATION MATTER**  
**AN ASSESSMENT OF DAMAGES**  
**HEARING IS REQUIRED**



Attorney for plaintiff

**SHAUNTAE GIDDINGS**  
5039 N. FRANKLIN STREET  
PHILADELPHIA, PA 19120

v.

**MING TSAI SHU**  
230 N. STAR ROAD  
NEWARK, DE 19711  
&  
**SHU-WANG SHENG**  
230 N. STAR ROAD  
NEWARK, DE 19711

COURT OF COMMON PLEAS  
COUNTY OF PHILADELPHIA  
CIVIL TRIAL DIVISION

**COMPLAINT IN PERSONAL INJURY**  
**2V MOTOR VEHICLE ACCIDENT**

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 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE

PHILADELPHIA BAR ASSOCIATION  
LAWYER REFERRAL and INFORMATION SERVICE  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY: (215) 451-6197

ADVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días, de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL:

ASOCIACION DE LICENCIADOS DE FILADELFIA  
SERVICIO DE REFENCIA E INFORMACION LEGAL  
One Reading Center  
Filadelfia, Pennsylvania 19107  
Teléfono: (215) 238-6333  
TTY: (215) 451-6197

**COMPLAINT IN PERSONAL INJURY**  
**2V MOTOR VEHICLE ACCIDENT**

1. Plaintiff, Shauntae Giddings, is a citizen and resident of the Commonwealth of Pennsylvania, residing at the address listed in the caption of this Complaint.

2. Defendant, Ming Tsai Shu, is a citizen and resident of the State of Delaware, with an address listed in the caption of this Complaint, who at all times material hereto was acting individually and/or as a lessee, agent, servant, workman, and/or employee of defendant, Shu-Wang Sheng, with defendant, Shu-Wang Sheng's, express, apparent and/or implied permission, authorization and/or consent.

3. Defendant, Shu-Wang Sheng, is a citizen and resident of the State of Delaware, with an address listed in the caption of this Complaint, who at all times material hereto was acting individually and/or by and through all lessees, agents, servants, workmen, and/or employees, including defendant, Ming Tsai Shu.

4. On or about July 8, 2012, plaintiff operated a motor vehicle at or near Front and South streets, in the city and county of Philadelphia, in the Commonwealth of Pennsylvania.

5. At the same date and time, defendant, Ming Tsai Shu or Shu-Wang Sheng, operated a motor vehicle owned by defendant, Shu-Wang Sheng and/or Ming Tsai Shu, at or near South and Front Streets, in the city and county of Philadelphia, in the Commonwealth of Pennsylvania.

6. Suddenly and without warning, defendant, Ming Tsai Shu or Shu-Wang Sheng, negligently, carelessly and/or recklessly operated defendants' motor vehicle in such a manner as to strike plaintiff's vehicle.

7. As a result of this accident, plaintiff suffered severe and permanent bodily injury as

more fully set forth below.

If Arbitration Hearing is appealed, plaintiff demands a jury trial in an amount in excess of fifty thousand dollars (\$50,000.00) dollars.

**COUNT I**  
**Shauntae Giddings v. Ming Tsai Shu**  
**Personal Injury**

8. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

9. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;

- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking plaintiff's vehicle;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the city and county of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

10. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions,

including, but not limited to: lumbar strain and sprain, cervical strain and sprain, disc bulges at L4-5 and L5-S1 and any other ills and injuries all to plaintiff's great loss and detriment.

11. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

12. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

13. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

14. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT II**  
**Shauntae Giddings v. Ming Tsai Shu**  
**Property Damage**

15. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

16. As a result of defendant's, negligence, carelessness and/or recklessness as aforesaid, plaintiff suffered property damage to plaintiff's vehicle and other related damages.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT III**  
**Shauntae Giddings v. Shu-Wang Sheng**  
**Personal Injury**

17. Plaintiff incorporates by reference all the allegations contained in the above paragraphs as if the same were set forth below at length.

18. The negligence, carelessness and/or recklessness of defendant, acting individually and/or by and through agents, servants, workmen and/or employees, consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;



- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking plaintiff's vehicle;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;

- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the city and county of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

19. The negligence, carelessness and/or recklessness of defendant further consisted of the following:

- a. Permitting an incompetent driver to operate the vehicle;
- b. Failing to determine whether defendant driver possessed the necessary skills and/or possessed the necessary mental or physical ability to exercise such driving skills;
- c. Failing to instruct defendant driver in the proper method of operating a motor vehicle;
- d. Failing to properly instruct the defendant driver on how to properly operate his vehicle and its warning apparatus in an emergency situation;
- e. Failing, as defendant driver's authority, to control defendant driver's conduct in regard to the manner in which defendant driver were operating the vehicle at the aforesaid time and place as herein before described; and,
- f. Allowing this dangerous, unsafe and defective motor vehicle to be operated on a public highway.

20. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body

function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: lumbar strain and sprain, cervical strain and sprain, disc bulges at L4-5 and L5, and other ills and injuries all to plaintiff's great loss and detriment.

21. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently, and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

22. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries along with the physical injuries suffered.

23. As a further result of the injuries sustained, the plaintiff has, is presently, and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

24. Furthermore, in addition to all the injuries and losses suffered, the plaintiff has incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits, pursuant to Act 57, for which plaintiff makes claim for in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT IV**  
**Shauntae Giddings v. Shu-Wang Sheng**  
**Property Damage**

25. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

26. As a result of defendant's, negligence, carelessness and/or recklessness as aforesaid, plaintiff suffered property damage to plaintiff's vehicle and other related damages.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**LAW OFFICES OF CRAIG A. ALTMAN P.C.**

/S/ David E. Kwartler  
**DAVID E. KWARTLER, ESQUIRE**

**VERIFICATION**

DAVID E. KWARTLER, ESQUIRE, being duly sworn according to law deposes and says that he is the attorney for the Plaintiff in this action and verifies that the facts contained in the foregoing pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to sworn falsification to authorities.

/S/ David E. Kwartler  
\_\_\_\_\_  
DAVID E. KWARTLER, ESQUIRE

**REVIEWED**

By Ronald Marrero at 12:21 pm, Oct 03, 2013

**RECEIVED**

By Charles Brew at 12:12 pm, Oct 03, 2013

LAW OFFICES OF CRAIG A. ALTMAN, P.C.  
BY: DAVID E. KWARTLER, ESQUIRE  
I.D. NO.: 205478  
19 SOUTH 21<sup>ST</sup> STREET  
PHILADELPHIA, PA 19103

---

SHAUNTAE GIDDINGS	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
	:	
V.	:	
	:	NO. 13-07-1767
MING TSAI SHU et al.	:	
	:	

---

STIPULATION

It is hereby agreed by and between counsel for the parties that Willie Shu shall be added as a defendant to this case and that the caption shall be amended to reflect that Willie Shu is a defendant in his case.

BY:   
\_\_\_\_\_  
DAVID E. KWARTLER, ESQUIRE  
Attorney for Plaintiff

BY: \_\_\_\_\_  
RONALD MARRERO, ESQUIRE  
Attorney for Defendants

# **EXHIBIT B**

**RECEIVED**

By Charles Brew at 12:00 pm, Feb 20, 2014

Court of Common Pleas of Philadelphia County  
Trial Division  
**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**JANUARY 2014****000702**

E-Filing Number: 1401013221

PLAINTIFF'S NAME PLASARD ALVAREZ		DEFENDANT'S NAME WILLIE SHU	
PLAINTIFF'S ADDRESS 5039 FRANKLIN STREET PHILADELPHIA PA 19120		DEFENDANT'S ADDRESS 230 NORTH STAR ROAD NEWARK DE 19711	
PLAINTIFF'S NAME VLADIMIR DUBUC		DEFENDANT'S NAME SHENG SHU-WANG	
PLAINTIFF'S ADDRESS 4945 NORTH HUTCHINSON STREET PHILADELPHIA PA 19141		DEFENDANT'S ADDRESS 230 NORTH STAR ROAD NEWARK DE 19711	
PLAINTIFF'S NAME ADONIS ELLIOTT		DEFENDANT'S NAME SHAUNTAE GIDDINGS	
PLAINTIFF'S ADDRESS 5200 NORTH MARSHALL STREET PHILADELPHIA PA 19120		DEFENDANT'S ADDRESS 5039 FRANKLIN STREET PHILADELPHIA PA 19120	
TOTAL NUMBER OF PLAINTIFFS 3	TOTAL NUMBER OF DEFENDANTS 3	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input checked="" type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input checked="" type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		<b>FILED PRO PROTHY JAN 09 2014 K. EDWARDS</b>	
		IS CASE SUBJECT TO COORDINATION ORDER? YES    NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>PLASARD ALVAREZ , VLADIMIR DUBUC , ADONIS ELLIOTT</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JASON I. MANUS		ADDRESS 1818 MARKET STREET SUITE 3620 PHILADELPHIA PA 19103	
PHONE NUMBER (215) 561-2800	FAX NUMBER (215) 561-0012		
SUPREME COURT IDENTIFICATION NO. 202263		E-MAIL ADDRESS jmanus@panjlawyers.com	
SIGNATURE OF FILING ATTORNEY OR PARTY JASON MANUS		DATE SUBMITTED Thursday, January 09, 2014, 02:34 pm	

Case ID: 140100702

Control No.: 14030737



USTED ESTA ORDENADO COMPARECER EN Arbitration Hearing 1880 JFK Blvd. 5th fl. at 09:15 AM - 09/25/2014  
 You must still comply with the notice below. USTED TODAVIA DEBE CUJPLIR CON EL AVISO PARA DEFENDERSE.  
 This matter will be heard by a Board of Arbitrators at the time, date and place specified but, if one or more parties is not present  
 at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties.  
 There is no right to a trial de novo on appeal from a decision entered by a Judge.

**MASTER WEINSTEIN SCHATZ MOYER, P.C.**  
 BY: JASON I. MANIUS, ESQUIRE

I.D. NO.: 202263  
 1818 Market Street, Suite 3620  
 Philadelphia, PA 19103  
 (215) 561-2800

**THIS IS AN ARBITRATION MATTER.  
 AN ASSESSMENT OF DAMAGES BY  
 HEARING IS REQUIRED.**



Attorney for plaintiffs

Plasard Alvarez  
 5039 Franklin Street  
 Philadelphia, PA 19120

COURT OF COMMON PLEAS

Vladimir Dubuc  
 4945 N. Hutchinson Street  
 Philadelphia, PA 19141

COUNTY OF PHILADELPHIA  
 CIVIL TRIAL DIVISION

Adonis Elliott  
 5200 N. Marshall Street  
 Philadelphia, PA 19120

*JANUARY TERM, 2014*  
*No. 0702*

v.

Willie Shu  
 230 N. Star Road  
 Newark, DE 19711

Sheng Shu-Wang  
 230 N. Star Road  
 Newark, DE 19711

Shauntae Giddings  
 5039 Franklin Street  
 Philadelphia, PA 19120

**COMPLAINT IN PERSONAL INJURY  
2V MOTOR VEHICLE ACCIDENT**

**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 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE**

**PHILADELPHIA BAR ASSOCIATION  
LAWYER REFERRAL and INFORMATION SERVICE  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY: (215) 451-6197**

**ADVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días, de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL:**

**ASOCIACION DE LICENCIADOS DE FILADELFA  
SERVICIO DE REFENCIA E INFORMACION LEGAL  
One Reading Center  
Filadelfia, Pennsylvania 19107  
Teléfono: (215) 238-6333  
TTY: (215) 451-6197**

**COMPLAINT IN PERSONAL INJURY**  
**2V MOTOR VEHICLE ACCIDENT**

1. Plaintiff, Plasard Alvarez, is a citizen and resident of the Commonwealth of Pennsylvania, residing at the address listed in the caption of this Complaint.

2. Plaintiff, Vladimir Dubuc, is a citizen and resident of the Commonwealth of Pennsylvania, residing at the address listed in the caption of this Complaint.

3. Plaintiff, Adonis Elliott, is a citizen and resident of the Commonwealth of Pennsylvania, residing at the address listed in the caption of this Complaint.

4. Defendant, Willie Shu, is a citizen and resident of the State of Delaware, with an address listed in the caption of this Complaint, who at all times material hereto was acting individually and/or as a lessee, agent, servant, workman, and/or employee of defendant, Sheng Shu-Wang, with defendant, Sheng Shu-Wang's, express, apparent and/or implied permission, authorization and/or consent.

5. Defendant, Sheng Shu-Wang is a citizen and resident of the State of Delaware, with an address listed in the caption of this Complaint, who at all times material hereto was acting individually and/or by and through all lessees, agents, servants, workmen, and/or employees, including defendant, Willie Shu.

6. Defendant, Shauntae Giddings, is a citizen and resident of the Commonwealth of Pennsylvania, with an address listed in the caption of this Complaint.

7. On or about July 8, 2012, plaintiff, Plasard Alvarez, was a passenger in a motor vehicle operated by defendant, Shauntae Giddings, at or near Front Street and South Street, in the City and County of Philadelphia, in the Commonwealth of Pennsylvania.

8. On or about July 8, 2012, plaintiff, Vladimir Dubuc, was a passenger in a motor vehicle operated by defendant, Shauntae Giddings, at or near Front Street and South Street, in the City and County of Philadelphia, in the Commonwealth of Pennsylvania.

9. On or about July 8, 2012, plaintiff, Adonis Elliott, was a passenger in a motor vehicle operated by defendant, Shauntae Giddings, at or near Front Street and South Street, in the City and County of Philadelphia, in the Commonwealth of Pennsylvania.

10. On or about July 8, 2012, defendant, Willie Shu, operated a motor vehicle owned by defendant, Sheng Shu-Wang, at or near Front Street and South Street, in the City and County of Philadelphia, in the Commonwealth of Pennsylvania.

11. Suddenly and without warning, defendants negligently, carelessly and/or recklessly operated their respective motor vehicles in such a manner as to collide with each other.

12. As a result of this accident, plaintiffs suffered severe and permanent bodily injury as more fully set forth below.

13. If Arbitration Hearing is appealed, plaintiff demands a jury trial in an amount in excess of fifty thousand dollars (\$50,000.00) dollars.

**COUNT I**  
Plasard Alvarez v. Willie Shu  
**Personal Injury**

14. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

15. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which Plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;

- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

16. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: cervical sprain/strain, thoracic sprain/strain, lumbar sprain/strain, headaches, post-concussion syndrome, and any other ills and injuries all to plaintiff's great loss and detriment.

17. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

18. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

19. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

20. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

## **COUNT II**

Plasard Alvarez v. Sheng Shu-Wang

### **Personal Injury**

21. Plaintiff incorporates by reference all the allegations contained in the above paragraphs as if the same were set forth below at length.

22. The negligence, carelessness and/or recklessness of defendant, acting individually and/or by and through agents, servants, workmen and/or employees, consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;

- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;



- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

23. The negligence, carelessness and/or recklessness of defendant further consisted of the following:

- a. Permitting an incompetent driver to operate the vehicle;
- b. Failing to determine whether defendant driver possessed the necessary skills and/or possessed the necessary mental or physical ability to exercise such driving skills;
- c. Failing to instruct defendant driver in the proper method of operating a motor vehicle;
- d. Failing to properly instruct the defendant driver on how to properly operate his vehicle and its warning apparatus in an emergency situation;
- e. Failing, as defendant driver's authority, to control defendant driver's conduct in regard to the manner in which defendant driver were operating the vehicle at the aforesaid time and place as herein before described; and,
- f. Allowing this dangerous, unsafe and defective motor vehicle to be operated on a public highway.

24. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions,

including, but not limited to: cervical sprain/strain, thoracic sprain/strain, lumbar sprain/strain, headaches, post-concussion syndrome, and other ills and injuries all to plaintiff's great loss and detriment.

25. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently, and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

26. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries along with the physical injuries suffered.

27. As a further result of the injuries sustained, the plaintiff has, is presently, and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

28. Furthermore, in addition to all the injuries and losses suffered, the plaintiff has incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits, pursuant to Act 57, for which plaintiff makes claim for in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT III**

Plasard Alvarez v. Shauntae Giddings

**Personal Injury**

29. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

30. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;

USTED ESTA ORDENADO COMPARECER EN Arbitration Hearing 1880 JFK Blvd. 5th fl. at 09:15 AM - 09/25/2014

You must still comply with the notice below. USTED TODAVIA DEBE CUJPLIR CON EL AVISO PARA DEFENDERSE.

This matter will be heard by a Board of Arbitrators at the time, date and place specified but, if one or more parties is not present at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties.

There is no right to a trial *denovo* on appeal from a decision entered by a Judge.

m. Striking the vehicle in which plaintiff was a passenger;

- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

31. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: cervical sprain/strain, thoracic sprain/strain, lumbar sprain/strain, headaches, post-concussion syndrome, and any other ills and injuries all to plaintiff's great loss and detriment.

32. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

33. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

34. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

35. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

#### **COUNT IV**

Vladimir Dubuc v. Willie Shu

#### **Personal Injury**

36. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

37. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;

- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which Plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;

- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

38. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: dorsal/thoracic sprain/strain, lumbar sprain/strain, and any other ills and injuries all to plaintiff's great loss and detriment.

39. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

40. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

41. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

42. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an

amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT V**

Vladimir Dubuc v. Sheng Shu-Wang

**Personal Injury**

43. Plaintiff incorporates by reference all the allegations contained in the above paragraphs as if the same were set forth below at length.

44. The negligence, carelessness and/or recklessness of defendant, acting individually and/or by and through agents, servants, workmen and/or employees, consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;



- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

45. The negligence, carelessness and/or recklessness of defendant further consisted of the following:

- a. Permitting an incompetent driver to operate the vehicle;
- b. Failing to determine whether defendant driver possessed the necessary skills and/or possessed the necessary mental or physical ability to exercise such driving skills;
- c. Failing to instruct defendant driver in the proper method of operating a motor vehicle;
- d. Failing to properly instruct the defendant driver on how to properly operate his vehicle and its warning apparatus in an emergency situation;
- e. Failing, as defendant driver's authority, to control defendant driver's conduct in regard to the manner in which defendant driver were operating the vehicle at the aforesaid time and place as herein before described; and,
- f. Allowing this dangerous, unsafe and defective motor vehicle to be operated on a public highway.

46. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: dorsal/thoracic sprain/strain, lumbar sprain/strain, and other ills and injuries all to plaintiff's great loss and detriment.

47. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently, and may

in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

48. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries along with the physical injuries suffered.

49. As a further result of the injuries sustained, the plaintiff has, is presently, and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

50. Furthermore, in addition to all the injuries and losses suffered, the plaintiff has incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits, pursuant to Act 57, for which plaintiff makes claim for in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

#### **COUNT VI**

Vladimir Dubuc v. Shauntae Giddings

#### **Personal Injury**

51. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

52. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;

- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

53. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: dorsal/thoracic sprain/strain, lumbar sprain/strain, and any other ills and injuries all to plaintiff's great loss and detriment.

54. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

55. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

56. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

USTED ESTA ORDENADO COMPARECER EN Arbitration Hearing 1880 JFK Blvd. 5th fl. at 09:15 AM - 09/25/2014  
You must still comply with the notice below. USTED TODAVIA DEBE CUJPLIR CON EL AVISO PARA DEFENDERSE.  
This matter will be heard by a Board of Arbitrators at the time, date and place specified but, if one or more parties is not present at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties.  
There is no right to a trial de novo or an appeal from a decision entered by a judge.

Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits provided by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT VI**  
Adonis Elliott v. Willie Shu  
**Personal Injury**

58. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

59. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;

- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which Plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of

the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,

r. In other respects that may be pointed out at time of trial.

60. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: cervical sprain/strain, dorsal/thoracic sprain/strain, lumbar sprain/strain, altered vertebral mechanic to the sacroiliac joint, left shoulder sprain/strain, and any other ills and injuries all to plaintiff's great loss and detriment.

61. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

62. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

63. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

64. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended,



and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**COUNT VIII**  
Adonis Elliott v. Sheng Shu-Wang  
**Personal Injury**

65. Plaintiff incorporates by reference all the allegations contained in the above paragraphs as if the same were set forth below at length.

66. The negligence, carelessness and/or recklessness of defendant, acting individually and/or by and through agents, servants, workmen and/or employees, consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;
- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;

- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;
- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

67. The negligence, carelessness and/or recklessness of defendant further consisted of the following:

- a. Permitting an incompetent driver to operate the vehicle;
- b. Failing to determine whether defendant driver possessed the necessary skills and/or possessed the necessary mental or physical ability to exercise such driving skills;
- c. Failing to instruct defendant driver in the proper method of operating a motor vehicle;
- d. Failing to properly instruct the defendant driver on how to properly operate his vehicle and its warning apparatus in an emergency situation;
- e. Failing, as defendant driver's authority, to control defendant driver's conduct in regard to the manner in which defendant driver were operating the vehicle at the aforesaid time and place as herein before described; and,
- f. Allowing this dangerous, unsafe and defective motor vehicle to be operated on a public highway.

68. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: cervical sprain/strain, dorsal/thoracic sprain/strain, lumbar sprain/strain, altered vertebral mechanic to the sacroiliac joint, left shoulder sprain/strain, and other ills and injuries all to plaintiff's great loss and detriment.

69. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently, and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

70. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries along with the physical injuries suffered.

71. As a further result of the injuries sustained, the plaintiff has, is presently, and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

72. Furthermore, in addition to all the injuries and losses suffered, the plaintiff has incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa. C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits, pursuant to Act 57, for which plaintiff makes claim for in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

### **COUNT IX**

Adonis Elliott v. Shauntae Giddings

#### **Personal Injury**

73. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.

74. The negligence, carelessness and/or recklessness of defendant consisted of the following:

- a. Operating a motor vehicle in a negligent, careless and/or reckless manner without regard for the rights or safety of plaintiff or others;
- b. Failing to have said vehicle under proper and adequate control;

- c. Failing to observe the position of plaintiff and to take such action as was necessary to prevent striking plaintiff;
- d. Failing to operate a motor vehicle at a speed which would allow defendant to stop within an assured clear distance;
- e. Operating said vehicle at a dangerous and excessive rate of speed under the circumstances;
- f. Being inattentive to defendant's duties as an operator of a motor vehicle;
- g. Disregarding traffic lanes, patterns and other devices;
- h. Failing to keep an adequate distance from vehicles in the vicinity of defendant's vehicle;
- i. Failing to perceive the highly apparent danger to others which the actions and/or inactions posed;
- j. Failing to give plaintiff meaningful warning signs concerning the impending incident;
- k. Failing to exercise ordinary care to avoid injuring plaintiff;
- l. Failing to be highly vigilant and maintain sufficient control of said vehicle;
- m. Striking the vehicle in which plaintiff was a passenger;
- n. Operating a motor vehicle with disregard for the rights, safety and proximity of plaintiff, even though defendant was aware, or should have been aware of plaintiff's presence and the threat of harm posed to plaintiff;
- o. Failing to inspect defendant's vehicle or to maintain defendant's vehicle in a safe and non-defective condition;

- p. Allowing a dangerous, unsafe and defective motor vehicle to be operated on a public highway;
- q. Failing to operate a motor vehicle in compliance with the applicable laws and ordinances of the City and County of Philadelphia and the Statutes of the Commonwealth of Pennsylvania pertaining to the operation and control of motor vehicles; and,
- r. In other respects that may be pointed out at time of trial.

75. As a direct result of the negligent, careless and/or reckless conduct of defendant, the plaintiff, suffered various serious and permanent personal injuries, serious impairment of body function and/or permanent serious disfigurement, and/or aggravation of pre-existing conditions, including, but not limited to: cervical sprain/strain, dorsal/thoracic sprain/strain, lumbar sprain/strain, altered vertebral mechanic to the sacroiliac joint, left shoulder sprain/strain, and any other ills and injuries all to plaintiff's great loss and detriment.

76. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great pain, anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

77. As an additional result of the carelessness, negligence and/or recklessness of defendant, plaintiff has suffered emotional injuries, along with the physical injuries suffered.

78. As a further result of the plaintiff's injuries, plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

79. Furthermore, in addition to all the injuries and losses suffered by the plaintiff, plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of the basic personal injury protection benefits required by the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §1701, et. seq., as amended, and/or Worker's Compensation Benefits pursuant to Act 57, for which plaintiff makes a claim for payment in the present action.

**WHEREFORE**, plaintiff demands judgment in plaintiff's favor and against defendant in an amount not in excess of Fifty Thousand (\$50,000.00) Dollars, plus all reasonable attorney's fees, costs and any other relief the court deems necessary.

**MASTER WEINSTEIN SCHATZ MOYER, P.C.**



**JASON I. MANUS, ESQUIRE**

**PLAINTIFF'S INTERROGATORIES and REQUESTS FOR PRODUCTION OF DOCUMENTS ARE ATTACHED TO AND SERVED WITH THIS COMPLAINT.**

**VERIFICATION**

I, Plasard Alvarez, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Complaint are that of counsel, verifier has relied on counsel in taking this Verification. The undersigned understands that this Verification is made subject to the penalties of 19 Pa. C.S. Section 4909 relating to unsworn falsifications to authorities.

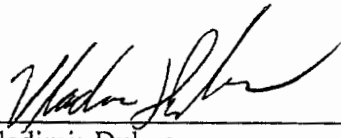
*Plasard Alvarez*

\_\_\_\_\_  
Plasard Alvarez




**VERIFICATION**

I, Vladimir Dubuc, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Complaint are that of counsel, verifier has relied on counsel in taking this Verification. The undersigned understands that this Verification is made subject to the penalties of 19 Pa. C.S. Section 4909 relating to unsworn falsifications to authorities.

  
\_\_\_\_\_  
Vladimir Dubuc

**VERIFICATION**

I, Adonis Elliott, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Complaint are that of counsel, verifier has relied on counsel in taking this Verification. The undersigned understands that this Verification is made subject to the penalties of 19 Pa. C.S. Section 4909 relating to unsworn falsifications to authorities.

  
Adonis Elliott