

Neil L. Albert, Esquire
Attorney I.D. No. 23368
Zimmerman, Pfannebecker, Nuffort & Albert, LLP
22 South Duke Street
Lancaster, PA 17602
(717) 299-0711

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA
CIVIL ACTION—LAW

HAZMAT 2,
Plaintiff,

vs.

No.

A. DUIE PYLE,
Defendant.

NOTICE TO DEFEND AND CLAIM RIGHTS

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.

Lancaster Bar Association
Lawyer Referral Service
28 East Orange Street
Lancaster, PA 17602
717-393-0737

10-25-2019
173, 25 PMD
ACH 693 481 40
Receipt
114 004

Neil L. Albert, Esquire
Attorney I.D. No. 23368
Zimmerman, Pfannebecker, Nuffort & Albert, LLP
22 South Duke Street
Lancaster, PA 17602
(717) 299-0711

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA **CI-19-10293**
CIVIL ACTION—LAW

HAZMAT 2,	:	
Plaintiff,	:	
	:	
vs.	:	No.
	:	
A. DUIE PYLE,	:	
Defendant.	:	

COMPLAINT PURSUANT TO 35 P.S. §6022.210

I. PARTIES

1. Plaintiff is HazMat 2, P.O. Box 263, Landisville, Lancaster County, Pennsylvania 17538. Plaintiff is a certified hazardous material response team under the Hazardous Material Emergency Planning and Response Act, 35 P.S. §6022.101 *et seq.* and was duly certified as of the date of the spill involved in this case.

2. Defendant is A. Duie Pyle, a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with offices at 650 Westtown Road, West Chester, Chester County, Pennsylvania 19382.

II. THE INCIDENT

3. On June 14, 2019, a tractor-trailer owned by Defendant and operated by Anthony Martin, Defendant's employee, acting within the scope of his employment, drove into a duly marked PennDOT work zone marked with flashing warning signals as well as other warnings and rear ended a parked vehicle on Route 222 South in Brecknock Township, Lancaster County, Pennsylvania.

CI-19-10293

4. The vehicle was hauling hazardous materials, as indicated on the State Police Report attached as Exhibit "A."

5. As a result of the accident, hazardous materials spilled upon the roadway and surrounding areas.

6. Plaintiff was requested by the Pennsylvania State Police and the Reamstown Fire Company and then dispatched by Lancaster County-Wide Communications to respond to the spill and performed services related to the containment and management of the hazardous materials released by the spill.

III. RESPONSE

7. Following the receipt of a call from the Pennsylvania State Police, Plaintiff as well as other responders responded and provided services at the site, as indicated on the Incident Report attached as Exhibit "B."

8. All the responders were supporting, paid, or volunteer emergency service organizations and were properly trained in accordance with the standards developed by the Hazardous Material and Response Act and were requested and dispatched by a legally constituted authority to deal with the emergency created by the spill.

9. The materials spilled were hazardous chemicals as defined by the Act, 35 P.S. §6022.103.

IV. COSTS

10. HazMat and other responding agencies incurred response costs, as that term is defined in 35 P.S. §6022.202(c), including operational administrative costs in the amount of \$47,826.78. Attached hereto and incorporated herein as Exhibit "C" is a true and correct copy of the costs incurred, including the administrative fees, in the total amount of \$47,826.78.

11. Defendant originally tendered a check to Plaintiff in the amount of \$41,588.50, but when informed that their check did not include the \$6,238.28 in administrative fees, it threatened to stop payment on the check after it had been deposited.

12. Plaintiff's counsel sent Defendant an email pleading with Defendant not to stop payment on the check because of the dislocation this would cause for innocent third parties if HazMat checks already written could not be honored. A true and correct copy of that letter is attached hereto as Exhibit "D."

13. Defendant refused to make the check good and the original check was dishonored by Defendant's bank, causing inconvenience to Plaintiff's vendors and extra administration work for Plaintiff.

14. Plaintiff has been required to retain the services of Zimmerman, Pfannebecker, Nuffort & Albert, LLP on an hourly rate basis to collect this amount. The Act provides for a position of court costs and attorney's fees as part of the costs of collection.

WHEREFORE, Plaintiff demands judgment against Defendant in the amount of
\$47,826.78, together with reasonable attorney's fees, together with court costs plus
interest from July 2, 2019, plus such other relief as the court may deem appropriate.

ZIMMERMAN, PFANNEBECKER,
NUFFORT & ALBERT, LLP

Dated: 10/23/19

By: 

CI-19-10293

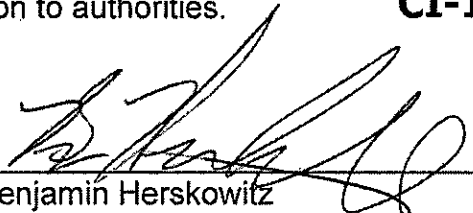
Neil L. Albert, Esquire
Attorney for Plaintiff
Attorney I.D. No. 23368
22 South Duke Street
Lancaster, PA 17602
(717) 299-0711

VERIFICATION

I, Benjamin Herskowitz, Chief of Lancaster County's HazMat 2 Environmental Fire Rescue, verify that the statements made in the foregoing Complaint Pursuant to 35 P.S. §6022.210 are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

CI-19-10293

DATED: 26 OCT 2019


Benjamin Herskowitz

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA
Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

CI-19-10293

EXHIBIT "A"

Commonwealth of Pennsylvania
Police Crash Report

ENTERED AND FILED
PROTHONOTARY'S OFFICE

Crash Involves:

☐ DUI ☐ Fatality ☐ Hit and Run ☒ Commercial Vehicle
☐ N/A ☐ Work Zone ☐ ATV ☐ Snowmobile

REPORTABLE

☐ State Police Vehicle ☒ Local Police Vehicle ☐ Local Gov Vehicle
☐ Commonwealth Vehicle

Electronically Filed
 Oct 24 2019 11:39AM
 Ricci Dehl

Police Agency Data	Agency Name PA STATE POLICE - LANCASTER				Case Closed YES		Patrol Zone J0139		Investigation Date 06/14/2019				
	Dispatch Time 03:54 hrs.		Arrival Time 04:13 hrs.		Investigator FLEMING, HAROLD				Badge Number 12193				
	Approval Date 08/03/2019				Reviewer ATKINSON, BRIAN D				Reviewer Badge Number 10110				
Crash Data	Date of Crash 06/14/2019		Time of Crash 03:53 hrs.		Day of the Week FRIDAY		Crash Description REAR END						
	County LANCASTER				Municipality BRECKNOCK TWP								
	Weather Conditions NO ADVERSE CONDITIONS				Relation to Roadway ON TRAVEL LANES								
	Illumination DARK -STREET LIGHTS				Road Surface Conditions DRY								
	# of Units 002	# of People 002	# of Injured 001	# Killed 000	School Bus Related NO		School Zone Related YES		Property Damaged NO				
	Type of Intersection MIDBLOCK				Special Location NOT APPLICABLE								
Work Zone	Work Zone YES		Work Zone Type MAINTENANCE (SHORT TERM)				Where in Work Zone ACTIVITY AREA						
	Speed Limit 65 MPH	Workers Present YES	Officer Present No	Work Zone Characteristics <input type="checkbox"/> Lane Closure <input type="checkbox"/> Road Closed with Detour <input type="checkbox"/> Work on Shoulder or Median <input checked="" type="checkbox"/> Intermittent or Moving Work <input type="checkbox"/> Flagger Control <input type="checkbox"/> Other									
Principal Road	Route Signing STATE HIGHWAY				Route Number 0222		Segment Number 02		Travel Lanes 65 MPH		Orientation SOUTH		
	House Number C				Street Name LANCASTER PIKE				St. Ending HIGHWAY				
Intersecting Rd.	Used in Intersection Crashes		Route Signing				Route Number		Segment Number		Travel Lanes		
			Street Name								Speed Limit		
Distance From Landmark Used for Mid-Block Crashes	Landmark 1	Route Number		Or Mile Post		Tenths		Delimiting Road Type		Ramp Use Only		Feet 02720	
		Street Name BOWMANVILLE				Street Ending ROAD				Or Miles		Tenths	
	Landmark 2	Route Number		Or Mile Post		Tenths		Delimiting Road Type		Ramp Use Only		The above entry is the distance from the Crash Scene to Landmark 1	
		Street Name				Street Ending							
GPS	Latitude:		Degrees 40	Minutes 14	Seconds 06	Decimal 280	Longitude:		Degrees 76	Minutes 02	Seconds 48	Decimal 520	
TCD	Traffic Control Device FLASHING TRAFFIC SIGNAL				Traffic Control Functioning DEVICE FUNCTIONING PROPERLY								
	Lane Closed FULLY		Lane Closure Direction SOUTH				Traffic Detoured YES		Estimated Time Closed 1-3 HRS				
Event Information	Environmental / Roadway Potential Factors (E/R)												
	Factor 1 NONE				Factor 2				Factor 3				
	First Harmful Event in the Crash						Most Harmful Event in the Crash						
	Unit Number 001		Harmful Event HIT UNIT 2				Unit Number 001		Harmful Event HIT UNIT 2				
	Indicated Prime Factor DRIVER ACTION				Unit Number 001		Prime Factor Driver Action DRIVING TOO FAST FOR CONDITIONS						
	Prime Factor Environmental/Roadway				Prime Factor Vehicle Failure				Prime Factor Pedestrian Action				
Road Surface Type						Special Jurisdiction							

Commonwealth of Pennsylvania

Police Crash Report

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Crash Involves:

☐ DUI ☐ Fatality ☐ Hit and Run ☒ Commercial Vehicle
☐ N/A ☐ Work Zone ☐ ATV ☐ Snowmobile

REPORTABLE

☐ State Police Vehicle ☒ Local Police Vehicle ☐ Local Gov Vehicle
☐ Commonwealth Vehicle

Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

Driver/Pedestrian Information	Unit Number 1	Type Unit Motor Vehicle in Transport	Commercial Vehicle Yes	Primary Violation			Charged
	First Name ANTHONY		MI O	Last Name MARTIN		Suffix	DOB 12/23/1985
	Street Address 2111 N SPRUCE ST		City WILMINGTON		State DE	Zip Code 19802-5017	
	Gender MALE	License Number 1389668	License State DE	Class CA	Expiration Date 12/23/2021	Owner/Driver PRIVATE VEHICLE OWNED/LEASED BY DRIVER	
	Driver Presence DRIVER OPERATED VEHICLE		Physical Condition APPARENTLY NORMAL		Alcohol/Drugs Suspected NO	Alcohol Test Type TEST NOT GIVEN	Alcohol Test Results
	Violation 1 3714A CARELESS DRIVING		Charged Y	Violation 2 3361 DRIVING VEHICLE AT SAFE SPEED		Charged Y	
	Violation 3		Charged	Violation 4		Charged	
	Drug Test Type NONE		Drug Test Results 1		Drug Test Results 2 CI-19-10293		
	Drug Test Results 3		Drug Test Results 4				
	Driver Action DRIVING TOO FAST FOR CONDITIONS						
Vehicle Information	Pedestrian Action		Pedestrian Signals		Pedestrian Clothing	Pedestrian Location	
	1st Harmful Event HIT UNIT 2		Left or Right Side		Most Harmful YES	Utility Pole Number	
	2nd Harmful Event		Left or Right Side		Most Harmful	Utility Pole Number	
	3rd Harmful Event		Left or Right Side		Most Harmful	Utility Pole Number	
	4th Harmful Event		Left or Right Side		Most Harmful	Utility Pole Number	
	Owner First Name MARTIN		Owner MI	Owner Last Name or Business Name A DUIE PYLE INC			Suffix
	Street Address 650 WESTTOWN RD		City WEST CHESTER		State PA	Zip Code 19381	
	Vehicle Type LARGE TRUCK		Vehicle Automation NOT APPLICABLE		Special Usage TRACTOR TRAILER	Government Equipment Number	
	Model Year 2016	Vehicle Make FREIGHTLINER	Vehicle Model TRUCK		Vehicle Color ORANGE	VIN 1FUJGEDV7GLHA5297	
	License Plate AG42344	Reg. State PA	Est. Speed 055	Vehicle Towed YES	Towed By BRESSLERS		
Insurance YES	Insurance Company NATIONAL UNION FIRE INS. CO.		Policy Number CA3584735		Expiration Date 10/01/2019		
Direction of Travel SOUTH	Vehicle Position RIGHT LANE "CURB"		Vehicle Movement GOING STRAIGHT		Initial Impact Point 1 O'CLOCK		
Damage Indicator DISABLING	Gradient LEVEL	Road Alignment STRAIGHT		Possible Vehicle Failures NONE			
Trailing Units	# of Units 1	Type Unit 1 SEMI-TRAILER	Tag Number 232739C		Tag Year 2019	Tag State ME	
	Unit Make WABASH NATIONAL		Unit Owner A DUIE PYLE INC				
	Type Unit 2		Tag Number		Tag Year	Tag State	
	Unit Make		Unit Owner				
	Engine Size cc	Passenger?	Saddle Bag/Trunk?		Trailer?	Driver Education?	
	Driver Helmet Type	Helmet Stayed On?	DOT/Snell Designation?		Eye Protection?	Long Sleeves?	Long Pants?
	Passenger Helmet Type	Helmet Stayed On?	DOT/Snell Designation?		Eye Protection?	Long Sleeves?	Long Pants?
	Passenger?		Helmet?				
	Head Lights?		Rear Reflectors?				

CAD/CASE Number: PA 2019-787120

Commonwealth of Pennsylvania
Police Crash ReportENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Crash Involves:

☐ DUI ☐ Fatality ☐ Hit and Run ☒ Commercial Vehicle
☐ N/A ☐ Work Zone ☐ ATV ☐ Snowmobile

REPORTABLE

☐ State Police Vehicle ☐ Local Police Vehicle ☐ Local Gov Vehicle
☒ Commonwealth Vehicle

Electronically Filed

Oct 24 2019 11:39AM

Ricci Dehl

Driver/Pedestrian Information	Unit Number	Type Unit		Commercial Vehicle	Primary Violation		Charged	
	2	Motor Vehicle in Transport		No				
	First Name		MI	Last Name		Suffix	DOB	
	DAVID		E	SHOVER		III	11/30/1972	
	Telephone Number							
	(614) 557-8064							
	Street Address		City		State		Zip Code	
	230 HOMESTEAD RD		JACKSON		OH		45640	
	Gender	License Number	License State	Class	Expiration Date	Owner/Driver		
	MALE	RK079840	OH	C	06/15/2020	OTHER		
Vehicle Information	Driver Presence		Physical Condition		Alcohol/Drugs Suspected		Alcohol Test Type	
	DRIVER OPERATED VEHICLE		APPARENTLY NORMAL		NO		TEST NOT GIVEN	
	Alcohol Test Results							
	Violation 1		Charged	Violation 2		Charged		
	Violation 3		Charged	Violation 4		Charged		
	Drug Test Type		Drug Test Results 1		Drug Test Results 2		CI-19-10293	
	NONE							
	Drug Test Results 3		Drug Test Results 4					
	Driver Action NO CONTRIBUTING ACTION							
	Pedestrian Action		Pedestrian Signals		Pedestrian Clothing		Pedestrian Location	
1st Harmful Event		Left or Right Side		Most Harmful		Utility Pole Number		
STRUCK BY UNIT 1				YES				
2nd Harmful Event		Left or Right Side		Most Harmful		Utility Pole Number		
3rd Harmful Event		Left or Right Side		Most Harmful		Utility Pole Number		
4th Harmful Event		Left or Right Side		Most Harmful		Utility Pole Number		
Vehicle Information	Owner First Name		Owner MI	Owner Last Name or Business Name		Suffix		
	W		L	INC				
	Street Address		City		State		Zip Code	
	2834 FISHER RD		COLUMBUS		OH		43204	
	Vehicle Type		Vehicle Automation		Special Usage		Government Equipment Number	
	SMALL TRUCK		NOT APPLICABLE		NOT APPLICABLE			
	Model Year	Vehicle Make	Vehicle Model		Vehicle Color		VIN	
	2007	GENERAL MTRS CORP	T7200		WHITE		1GDK7F1367F400552	
	License Plate	Reg. State	Est. Speed	Vehicle Towed	Towed By			
	PGT1783	OH	003	YES	BRESSLERS			
Insurance		Insurance Company		Policy Number		Expiration Date		
YES		NATIONWIDE P&C INSURANCE CO.		ACP BAK 57-6-6095399		05/13/2020		
Direction of Travel		Vehicle Position		Vehicle Movement		Initial Impact Point		
SOUTH		RIGHT LANE "CURB"		GOING STRAIGHT		6 O'CLOCK		
Damage Indicator		Gradient		Road Alignment		Possible Vehicle Failures		
DISABLING		LEVEL		STRAIGHT		NONE		
Trailing Units	# of Units	Type Unit 1	Tag Number		Tag Year	Tag State		
	0							
	Unit Make		Unit Owner					
	Type Unit 2	Tag Number		Tag Year	Tag State			
	Unit Make		Unit Owner					
	Motorcycle	Engine Size	Passenger?		Saddle Bag/Trunk?		Trailer?	
		cc						
Driver Helmet Type		Helmet Stayed On?	DOT/Snell Designation?		Eye Protection?	Long Sleeves?	Long Pants?	
							Over Ankle Boots?	
Passenger Helmet Type		Helmet Stayed On?	DOT/Snell Designation?		Eye Protection?	Long Sleeves?	Long Pants?	
							Over Ankle Boots?	
Pedalcycle	Passenger?			Helmet?				
	Head Lights?			Rear Reflectors?				

CAD/CASE Number: PA 2019-787120

Commonwealth of Pennsylvania
Police Crash Report

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Crash Involves:

☐ DUI ☐ Fatality ☐ Hit and Run ☒ Commercial Vehicle
☐ N/A ☐ Work Zone ☐ ATV ☐ Snowmobile

REPORTABLE

☐ State Police Vehicle ☐ Local Police Vehicle ☐ Local Gov Vehicle
☐ Commonwealth Vehicle

Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

Commercial Vehicle	Unit Number	Number of Axles	Carrier Name	Phone Number
	1	03	A DUJE PYLE INC	6106965800
	Street Address		City	State Zip Code
	P.O. BOX 564		WEST CHESTER	PA 19381
	Cargo Body Type	Vehicle Configuration	GVWR	
	VAN / ENCLOSED BOX	TRACTOR / SEMI-TRAILER(S)	080000	
	Oversize Load	USDOT Number	PUC Number	Hazardous Materials
	NO	00113594		
HazMat Class 1	Release Indicator 1			
HazMat Class 2	Release Indicator 2			
HazMat Class 3	Release Indicator 3			
HazMat Class 4	Release Indicator 4			

CI-19-10293

People Information	Unit #	Person No.	First Name	MI	Last Name	Suffix	DOB
	001	001	ANTHONY	O	MARTIN		12/23/1985
	Street Address			City		State	Zip Code
	2111 N SPRUCE ST			WILMINGTON		DE	19802-5017
	Phone Number	EMS Transport	Person Type	Gender	Injury Severity		
	(302) 765-8345	REFUSED TRANSPORT	DRIVER	MALE	NOT INJURED		
	EMS Agency	Medical Facility					
	LANCASTER EMS ASSOC	NONE					
Seat Position	Safety Equipment 1						
DRIVER - ALL VEHICLES	LAP AND SHOULDER BELT USED						
Safety Equipment 2	Extrication						
AIR BAG NOT DEPLOYED - UNK SWITCH SETTING	NOT EXTRICATED						
Ejection	Ejection Path						
NOT EJECTED	NOT EJECTED/NOT APPLICABLE						

People Information	Unit #	Person No.	First Name	MI	Last Name	Suffix	DOB
	002	002	DAVID	E	SHOVER	III	11/30/1972
	Street Address			City		State	Zip Code
	230 HOMESTEAD RD			JACKSON		OH	45640
	Phone Number	EMS Transport	Person Type	Gender	Injury Severity		
	(614) 557-8064	TRANSPORTED	DRIVER	MALE	INJURY, UNKNOWN SEVERITY		
	EMS Agency	Medical Facility					
	REAMSTOWN FIRE CO. #1	NONE					
Seat Position	Safety Equipment 1						
DRIVER - ALL VEHICLES	LAP AND SHOULDER BELT USED						
Safety Equipment 2	Extrication						
AIR BAG NOT DEPLOYED - UNK SWITCH SETTING	NOT EXTRICATED						
Ejection	Ejection Path						
NOT EJECTED	NOT EJECTED/NOT APPLICABLE						

Commonwealth of Pennsylvania
Police Crash ReportENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Crash Involves:

☐ DUI☐ Fatality☐ Hit and Run☒ Commercial Vehicle

REPORTABLE

☐ State Police Vehicle☐ Local Police Vehicle☐ N/A☐ Work Zone☐ ATV☐ Snowmobile☐ Commonwealth Vehicle☐ Local Gov Vehicle

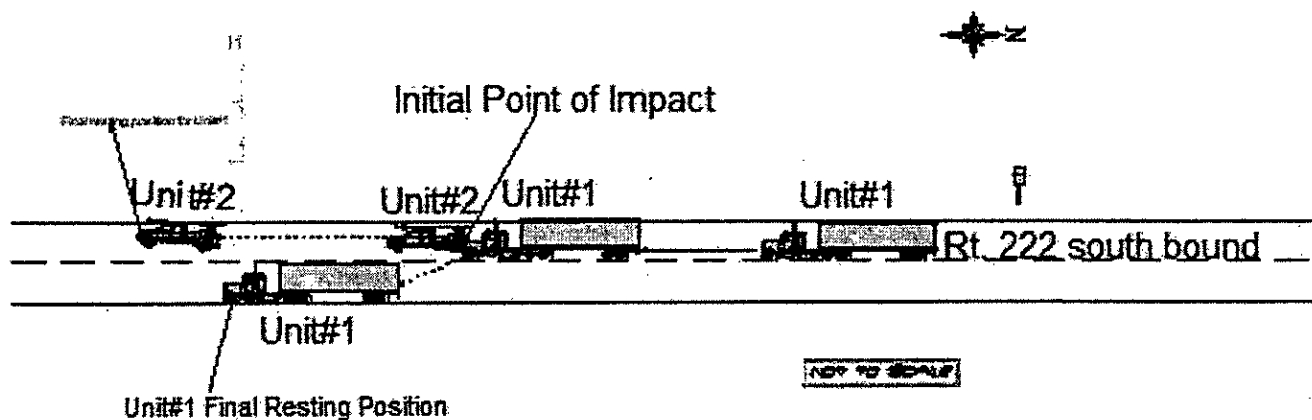
Electronically Filed

Oct 24 2019 11:39AM

Rice Dehl

CI-19-10293

Diagram



Bowmansville Borough 3 Miles

**Commonwealth of Pennsylvania
Police Crash Report**

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Crash Involves:

☐ DUI☐ Fatality☐ Hit and Run☒ Commercial Vehicle

REPORTABLE

☐ State Police Vehicle☐ Local Police Vehicle☐ Commonwealth Vehicle☐ Local Gov Vehicle

NARRATIVE

☐ N/A☐ Work Zone☐ ATV☐ Snowmobile

Electronically Filed

Oct 24 2019 11:39AM

Ricci Dehl

Crash Synopsis

This two vehicle reportable crash with injuries occurred as Unit#1 was traveling south bound Rt. 222 and struck the rear of Unit#2. Operator#2 was injured and transport to Ephrata Hospital for his injuries. Operator#1 was not injured.

Crash Details

SYNOPSIS:

This two vehicle reportable crash with injuries occurred as Unit#1 was traveling south bound Rt. 222 and struck the rear of Unit#2. Operator#2 was injured and transport to Ephrata Hospital for his injuries. Operator#1 was not injured.

PHYSICAL EVIDENCE:

Upon arriving on scene I observed Unit#1 and Unit#2 at its final resting position. Unit#1 was south bound on Rt. 222 facing south in the left lane. Unit#2 was south bound on Rt. 222 facing south in the right lane. I observed Unit#1 to sustain disabling damage to its 2 O'Clock position. I observed Operator#1 not to be injured and standing on the side of the road. I observed Unit#2 to sustain disabling damage to its 6 O'clock position. I observed Operator#2 in the back of an ambulance with no visible injuries.

INTERVIEWS:

On 06/14/19, at approximately 0416 HRS I interviewed Operator#2 at the crash scene Operator#2 related the following: He was sitting in the vehicle traveling south bound Rt. 222 in the right lane at 10 Mph and for unknown reasons Unit#1 struck his vehicle from behind. Operator#2 related he had some pain to his ankle and wanted medical treatment.

On 06/14/19, at approximately 0425 HRS I interviewed Operator#1 at the crash scene Operator#1 related the following: He was traveling south bound on Rt. 222 at 55 Mph in the right lane and did not see the message board to Unit#2 which is a construction zone crash truck and struck the rear of Unit#2. Operator#1 related he was not injured and refused medical attention.

CONCLUSION:

Unit#1 was hauling some type of hazard substance and Lancaster County Hazmat team did respond.

Operator#1 was cited for this crash

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA
Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

CI-19-10293

EXHIBIT "B"

Incident Details

Incident #: 1906015977

Type: VEHICLE ACCIDENT-
TRACTOR TRAILER
Time Received: 06/14/2019 03:50:25
Status: COMPLETE
Service: FIRE
Box Alias: BOX 11-6 (25) ROUTE
222
Originated By: ANI/ALI (911)
Primary Agency: ADAMSTOWN FD
Responsible Unit: ENGINE 11-1

Incident Location

Location: 485 ROUTE 222 S
Municipality: BRECKNOCK TOWNSHIP
Phone: Unlisted
Additional Info:
Common Place:
Cross Streets: ORCHARD
RD/BOWMANSVILLE RD
Latitude: 40.2352435664335
Longitude: -76.0466292641492

CI-19-10293

Comments

Date/Time	Comment
06/14/2019 03:49:40	TT CRASHED INTO A WORK TRUCK - TT IS HAULING CHEMICALS - UNKN WHAT - CALLER IS UNABLE TO SEE ANY PLACARDS
06/14/2019 03:50:49	PSP ADV
06/14/2019 03:51:04	BLOCKING ROADWAY - CALLER IS NOT INVOLVED - IS A WORKER IN THE CONSTRUCTION AREA
06/14/2019 03:58:28	E11-1 W/5 E17-1 W/4
06/14/2019 03:59:53	DC17-1 OS
06/14/2019 04:00:07	CHIEF 17-1 OS
06/14/2019 04:00:54	BERKS 85 TRAFFIC / BERKS 72 - FP32 FP33 SHUTTING DOWN 222 AND 568
06/14/2019 04:03:10	REQ HAZMAT DUTY OFFICER
06/14/2019 04:04:48	DC11
06/14/2019 04:14:33	8TAC91 FOR FIREPOLICE
06/14/2019 05:06:24	AIR 18 TO THE SCENE - 222 AND 568
06/14/2019 05:10:00	TRAFFIC 16 272/COLONIAL GEORGE - 272/897 - 17-1/2/3
06/14/2019 05:52:07	FP29
06/14/2019 06:41:27	FIRE POLICE 15 AND 39 TO COLONIAL GEORGE//ROUTE 272
06/14/2019 13:55:33	ROADWAY RE-OPENED -- COMMAND TERMINATED

Currently In Command Units

Unit Name	Status	Incident Number
No data to display		

Currently Assigned Units

Unit Name	Status	Status Date/Time	Elapsed Time (DD:HH:MM:SS)	Unit Functions	Personnel
No data to display					

Unit Assignment History

Unit Name	Status	Date/Time	***Electronically Filed*** Personnel
AIR 18	Dispatched as AIR	06/14/2019 05:06:35	Oct 24 2019 11:39AM Ricci Dehl
AIR 18	Responding	06/14/2019 05:12:58	
AIR 18	On Scene	06/14/2019 05:24:47	
AIR 18	Available	06/14/2019 08:40:39	
BRUSH 11	Dispatched as BRUSH	06/14/2019 08:59:36	
BRUSH 11	Responding	06/14/2019 08:59:38	
BRUSH 11	On Scene	06/14/2019 09:04:04	
BRUSH 11	Available	06/14/2019 13:55:43	
DUTY OFFICER 02	Dispatched as CHIEF OFFICER	06/14/2019 04:05:55	CHRIS HALDEMAN-902060
DUTY OFFICER 02	Responding	06/14/2019 04:11:56	CHRIS HALDEMAN-902060
DUTY OFFICER 02	On Scene	06/14/2019 04:17:21	CHRIS HALDEMAN-902060
DUTY OFFICER 02	Available	06/14/2019 10:24:27	CHRIS HALDEMAN-902060
DUTY OFFICER 87	Dispatched as DUTY OFFICER	06/14/2019 04:02:32	DANIEL SCULLY-987004
DUTY OFFICER 87	Available	06/14/2019 13:55:43	DANIEL SCULLY-987004
ENGINE 11-1	Dispatched as GENERAL FIRE UNIT	06/14/2019 03:51:24	
ENGINE 11-1	Redispatched	06/14/2019 03:57:19	
ENGINE 11-1	Responding	06/14/2019 03:58:22	
ENGINE 11-1	On Scene	06/14/2019 04:04:22	
ENGINE 11-1	Available	06/14/2019 10:01:24	
ENGINE 17-1	Dispatched as ENGINE	06/14/2019 03:51:24	
ENGINE 17-1	Redispatched	06/14/2019 03:57:20	
ENGINE 17-1	Responding	06/14/2019 03:59:26	
ENGINE 17-1	On Scene	06/14/2019 04:07:07	
ENGINE 17-1	Available	06/14/2019 09:10:13	
FIRE POLICE 15	Dispatched as FIRE POLICE	06/14/2019 06:42:23	
FIRE POLICE 15	Available	06/14/2019 13:55:43	
FIRE POLICE 16	Dispatched as FIRE POLICE	06/14/2019 05:10:24	
FIRE POLICE 16	Available	06/14/2019 10:03:33	
FIRE POLICE 17-1	Dispatched as FIRE POLICE	06/14/2019 05:10:29	
FIRE POLICE 17-1	Available	06/14/2019 13:55:43	
FIRE POLICE 17-2	Dispatched as FIRE POLICE	06/14/2019 05:10:34	
FIRE POLICE 17-2	Available	06/14/2019 10:01:33	
FIRE POLICE 17-3	Dispatched as FIRE POLICE	06/14/2019 05:10:39	
FIRE POLICE 17-3	Available	06/14/2019 13:55:43	
FIRE POLICE 29	Dispatched as FIRE POLICE	06/14/2019 05:51:50	FP29 FIRE POLICE 29-929042
FIRE POLICE 29	Available	06/14/2019 06:16:11	FP29 FIRE POLICE 29-929042
FIRE POLICE 32	Dispatched as FIRE POLICE	06/14/2019 04:01:34	
FIRE POLICE 32	Available	06/14/2019 13:55:43	
FIRE POLICE 33	Dispatched as FIRE POLICE	06/14/2019 04:01:39	
FIRE POLICE 33	Available	06/14/2019 13:55:43	

CI-19-10293

Electronically Filed
JAN 14 2019 11:39AM
Ricci Dehl

FIRE POLICE 39	Dispatched as FIRE POLICE	06/14/2019 06:42:10	FP39 FIRE POLICE 39-939137
FIRE POLICE 39	Responding	06/14/2019 06:55:03	FP39 FIRE POLICE 39-939137
FIRE POLICE 39	On Scene	06/14/2019 07:13:14	FP39 FIRE POLICE 39-939137
FIRE POLICE 39	Available	06/14/2019 13:55:43	FP39 FIRE POLICE 39-939137
FIREPOLICE 72 BER	Dispatched as FIRE POLICE	06/14/2019 04:01:56	
FIREPOLICE 72 BER	Available	06/14/2019 13:55:43	
FIREPOLICE 85 BER	Dispatched as FIRE POLICE	06/14/2019 04:01:50	
FIREPOLICE 85 BER	Available	06/14/2019 13:55:43	
HAZMAT 02-1	Dispatched as HAZMAT	06/14/2019 04:31:14	HM021 HAZMAT 02-1-902012
HAZMAT 02-1	Redispached	06/14/2019 04:54:25	HM021 HAZMAT 02-1-902012
HAZMAT 02-1	Responding	06/14/2019 05:32:56	HM021 HAZMAT 02-1-902012
HAZMAT 02-1	On Scene	06/14/2019 06:01:45	HM021 HAZMAT 02-1-902012
HAZMAT 02-1	Available	06/14/2019 09:11:15	HM021 HAZMAT 02-1-902012
HAZMAT 02-2	Dispatched as HAZMAT	06/14/2019 05:52:04	HM022 HAZMAT 02-2-902013
HAZMAT 02-2	Responding	06/14/2019 05:52:07	HM022 HAZMAT 02-2-902013
HAZMAT 02-2	On Scene	06/14/2019 06:19:27	HM022 HAZMAT 02-2-902013
HAZMAT 02-2	Available	06/14/2019 09:11:14	HM022 HAZMAT 02-2-902013
SQUAD 17-3	Dispatched as SQUAD	06/14/2019 05:19:07	
SQUAD 17-3	Responding	06/14/2019 05:19:10	
SQUAD 17-3	On Scene	06/14/2019 05:38:54	
SQUAD 17-3	Available	06/14/2019 08:34:18	
SQUAD 17-3	Dispatched as SQUAD	06/14/2019 08:49:27	
SQUAD 17-3	Responding	06/14/2019 08:49:32	
SQUAD 17-3	On Scene	06/14/2019 08:53:09	
SQUAD 17-3	Available	06/14/2019 13:55:43	
SQUAD 32-1	Dispatched as SQUAD	06/14/2019 04:11:08	
SQUAD 32-1	Responding	06/14/2019 04:11:11	
SQUAD 32-1	On Scene	06/14/2019 04:16:49	
SQUAD 32-1	Available	06/14/2019 13:55:43	
TRAFFIC 15	Dispatched as FIRE POLICE	06/14/2019 06:42:26	
TRAFFIC 15	Responding	06/14/2019 06:50:39	
TRAFFIC 15	On Scene	06/14/2019 07:00:01	
TRAFFIC 15	Available	06/14/2019 11:16:54	
TRAFFIC 16	Dispatched as FIRE POLICE	06/14/2019 05:10:23	
TRAFFIC 16	Available	06/14/2019 10:03:39	
TRAFFIC 29	Dispatched as FIRE POLICE	06/14/2019 05:51:53	TRAF29 TRAFFIC 29-929041
TRAFFIC 29	Available	06/14/2019 06:16:16	TRAF29 TRAFFIC 29-929041

CI-19-10293

TRAFFIC 39	Dispatched as FIRE POLICE	06/14/2019 06:42:36	TRAFFIC 39 939123
TRAFFIC 39	Available	06/14/2019 06:54:46	TRAFFIC 39 939123
TRAFFIC 85 BER	Dispatched as FIRE POLICE	06/14/2019 04:01:49	TRAFFIC 85 BER 939123
TRAFFIC 85 BER	Available	06/14/2019 13:55:43	TRAFFIC 85 BER 939123

*** Electronically Filed ***
Oct 24 2019 11:39AM
Ricci Dehl

Previous Location History

Date/Time	Incident Type
06/14/2019 03:50:25	VEHICLE ACCIDENT-TRACTOR TRAILER
06/14/2019 03:48:23	VEHICLE ACCIDENT-TRACTOR TRAILER
01/07/2019 05:39:22	VEHICLE ACCIDENT-UNKNOWN INJURY
01/07/2019 05:39:21	VEHICLE ACCIDENT-UNKNOWN INJURY
01/07/2019 05:34:48	VEHICLE ACCIDENT-UNKNOWN INJURY
03/14/2017 04:43:50	VEHICLE ACCIDENT-UNKNOWN INJURY

CI-19-10293

Attachments

Date/Time	File Type	File Name	Sender	Link
No data to display				

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA
Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

CI-19-10293

EXHIBIT "C"

HazMat 2 Environmental Fire Rescue Co.

ENTERED AND FILED
PROTHONOTARY'S OFFICE

LANCASTER, PA

Electronically Filed***

Oct 24 2019 11:39AM

Ricci Dehl

PO Box 263
Landisville, PA 17538-0263
billing@hazmat2.com
(717) 537-4197

Invoice #	1906015977
-----------	------------

Bill To

A. Duie Pyle
P.O. Box 564
West Chester, PA 19381

Invoice Date	7/2/2019
Due Date	8/1/2019
Incident Date	06/14/2019

CI-19-10293

Item	Description	Qty	Rate	Amount
HM Squad	Squad 2-2	6.25	250.00	1,562.50
HM 2-1	Heavy Duty HazMat	6	600.00	3,600.00
HM 2-2	Medium Duty HazMat	6	300.00	1,800.00
Containment Trailer		6	150.00	900.00
Mileage Round Trip		278	1.25	347.50
95 Gallon Poly Overpack Drum		4	275.00	1,100.00
Granular Absorbent Reform	30 LB Bag	10	26.00	260.00
Spilltration SpillBoa 10	10 Feet	3	52.50	157.50
Nitrile Overglove		6	10.00	60.00
Nitrile Underglove	(1) box	50	1.00	50.00
Chemical Protective Coverall	2XL	2	100.00	200.00
Chemical Protective Coverall	4XL	2	100.00	200.00
Rescue gloves		1	72.00	72.00
NFPA locking carabiner		1	36.00	36.00
ARS Multi-Loop Rescue Strap w/R		1	102.00	102.00
pH Paper	Per Strip	1	5.00	5.00
Decon Solution #5	Per bottle	1	150.00	150.00
Engine	Engine 11	6	500.00	3,000.00
Utility Vehicle	Squad 11	8.5	150.00	1,275.00
Rescue gloves	Station 11	6	72.00	432.00
Nitrile Underglove	(1) box - Station 11	50	1.00	50.00
Granular Absorbent Reform	30 LB Bag - Station 11	6	26.00	156.00
Cleaning of Fire Gear	Decon/washing of gear - Station 11	8	100.00	800.00
Engine	Engine 17-1	6	500.00	3,000.00
Cleaning of Fire Gear	Decon/washing of gear - Station 17-1	8	100.00	800.00
Nitrile Underglove	(1) box - Station 17-1	50	1.00	50.00
Rescue gloves	Station 17-1	4	72.00	288.00
Webbing	100 ft.	1	60.00	60.00
NFPA locking carabiner		1	36.00	36.00
Granular Absorbent Reform	30 LB Bag	15	26.00	390.00
Rehab for Responders	Per Person	10	10.00	100.00
Air Unit / Cascade	Station 18	5	300.00	1,500.00
Cleaning of Fire Gear	Decon/washing of gear - Station 18	2	100.00	200.00
Utility Vehicle	Fire Police 11	11	150.00	1,650.00
Utility Vehicle	Traffic 15	11	150.00	1,650.00

Authority: Pursuant to Pennsylvania Act 165 1990 Section 210- Recovery of Response Costs: (a)
A person who causes a release of a hazardous material shall be liable for response costs
incurred by a certified hazardous materials response team.

Balance Due

Terms

Net 30

HazMat 2 Environmental Fire Rescue Co.

ENTERED AND FILED
PROTHONOTARY'S OFFICE

LANCASTER, PA

Electronically Filed

Oct 24 2019 11:39AM

Ricci Dehl

PO Box 263
Landisville, PA 17538-0263
billing@hazmat2.com
(717) 537-4197

Invoice #	1906015977
-----------	------------

Bill To

A. Duic Pyle
P.O. Box 564
West Chester, PA 19381

Invoice Date	7/2/2019
Due Date	8/1/2019
Incident Date	06/14/2019

CI-19-10293

Item	Description	Qty	Rate	Amount
Utility Vehicle	Traffic 16	11	150.00	1,650.00
Utility Vehicle	Fire Police 17-1	11	150.00	1,650.00
Utility Vehicle	Fire Police 17-2	11	150.00	1,650.00
Utility Vehicle	Squad 32	11	150.00	1,650.00
Utility Vehicle	Fire Police 33	11	150.00	1,650.00
Utility Vehicle	Traffic 39	11	150.00	1,650.00
Utility Vehicle	FP 72 (Berks Co.)	11	150.00	1,650.00
Utility Vehicle	Traffic 85 (Berks Co.)	11	150.00	1,650.00
BLS Unit	Ambulance 17-1	6	150.00	900.00
BLS Unit	Ambulance 9-1	3	150.00	450.00
Contractor Services	Skid loader, pallet jack, operator	6	150.00	900.00
Diesel fuel		30	3.30	99.00
	Subtotal			41,588.50
Administrative Fee			15.00%	6,238.28

Authority: Pursuant to Pennsylvania Act 165 1990 Section 210- Recovery of Response Costs: (a)
A person who causes a release of a hazardous material shall be liable for response costs
incurred by a certified hazardous materials response team.

Balance Due \$47,826.78

Terms

Net 30

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA
Electronically Filed
Oct 24 2019 11:39AM
Ricci Dehl

CI-19-10293

EXHIBIT "D"

~~Oct 21 2019 11:39AM~~

Neil Albert

Ricci Dehl

From: Neil Albert
Sent: Wednesday, September 4, 2019 3:31 PM
To: 'thurford@aduiepyle.com'
Cc: Rachel Rosenzweig (rachelr@hazmat2.com); Benajmin Herskowitz (bherkowitz@hazmat2.com)
Subject: incident of 6/14/2019
Importance: High

Dear Mr. Hurford,

Please be advised that I am counsel for Hazmat2, an approved hazardous materials response team. I have had the privilege of representing these folks for almost thirty years. Unlike many hazmat companies, they are volunteers and the only compensation they receive is mileage. The company supports itself by recovery of expenditures for equipment and materials as set by a county-wide agency. The organization exists by virtue of the PA Hazardous Material Emergency Planning and Response Act, 35. P.S. 6022.101. Cost recovery is covered by 35 P.S. 6022.210. Subsection (b) authorizes recovery of administrative costs and legal fees. I have recovered both attorney's fees and administrative fees in the Court of Common Pleas of Lancaster County in these collections over the years. Most recently I represented a group of about 40 emergency responders in a huge spill in Franklin County that was not the fault of the trucking company involved that was settled to everyone's satisfaction about six months ago.

As I understand the situation, your client actually discharged the waste material but the fault for the accident lies with another party. I trust you understand that the Act is a no-fault statute; I have litigated this a number of times over the years. You sent a check for \$41,588.50, leaving an open balance of \$6,238.28, which I understand that you deducted because you were uncertain about the administrative charges.

I am writing to you at this moment because of our understanding that you are going to stop payment on the check because of the dispute about the administrative fees. This is going to create chaos in our organization if you do so and I urge you in the strongest terms to reconsider. Hasty actions can lead to regret.

We want to work with you to help you recover 100% of what you are paying us from the responsible tortfeasor. We do not want to have to sue you for what is owed and incur attorneys fees under the Act for which you would ultimately be held responsible. Let's not go there. For the moment, let the check go through; we can talk about the rest at our leisure.

Neil L. Albert, Esquire
Zimmerman, Pfannebecker, Nuffort & Albert, LLP
22 South Duke Street, Lancaster, PA 17602
(717) 299-0711
(717) 299-1092 Fax

The information contained in this communication is from a law firm and is privileged. It is intended only for the confidential use of the intended recipient. If you have received this communication in error, please immediately notify us by telephone and delete the message from your system.

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA
PROTHONOTARY
CIVIL COVER SHEET

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA
*** Electronically Filed ***
Oct 24 2019 11:39AM
Ricci Dehl

PLEASE LIST NAMES AND ADDRESSES OF ADDITIONAL PARTIES ON A SEPARATE SHEET.
ALL PARTY INFORMATION IS REQUIRED INCLUDING ZIP CODES & PARTY INFORMATION MUST MATCH THE
PLEADING. PLEASE DO NOT STAPLE THE COVER SHEET TO THE PLEADING. IF AN EVENT NEEDS TO BE
SCHEDULED, A CAO SCHEDULING COVER SHEET MUST ALSO BE ATTACHED

TYPE OF ACTION: Recovery of Health and Safety Response
Costs

For Prothonotary use only:

DOCKET No: CI-

PARTY INFORMATION

PLAINTIFF'S NAME

HAZMAT 2

ADDRESS:

P.O. Box 263

Landisville, PA 17538

MUNICIPALITY (TOWNSHIP):
(REQUIRED)

East Hempfield Township

VS. DEFENDANT'S NAME

A. DUIE PYLE

ADDRESS:

650 Westtown Road

West Chester, PA 19382

MUNICIPALITY (TOWNSHIP):
(REQUIRED)

CI-19-10293

FILING ATTORNEY/ FILING PARTY INFORMATION

Firm: Zimmerman, Pfannebecker, Nuffort & Albert

Filing Attorney/ Party:

Neil L. Albert, Esquire

Address: 22 South Duke Street

City: Lancaster

Telephone Number: 717-299-0711

Fax Number: 717-299-1092

AOPC #

23368

State: PA

Zip Code: 17602

Email: nla@zpnalaw.com

TAX LIEN INFORMATION

MAP REFERENCE:

WARD:

INSTRUMENT NUMBER:

PROPERTY DESCRIPTION:

TAX YEAR:

MUNICIPALITY:

SALE PRICE: \$

DEED DATE:

TAX LIEN AMOUNT:

PFA INFORMATION

HEARING DATE:

SOCIAL SECURITY # (Defendant- last 4 digits)

POLICE DEPARTMENT:

PREVIOUS PETITIONS:

Supreme Court of Pennsylvania

Court of Common Pleas

Civil Cover Sheet

LANCASTER

County

ENTERED AND FILED
PROTHONOTARY'S OFFICE
LANCASTER, PA

Electronically Filed

For Prothonotary Use Only:

Oct 24 2019 11:39AM

Ricci Dehl

Docket No:

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons
☐ Transfer from Another Jurisdiction

- ☐ Petition
☐ Declaration of Taking

Lead Plaintiff's Name:

HAZMAT 2

Lead Defendant's Name:

A. DUIE PYLE

Are money damages requested? ☒ Yes ☐ No

Dollar Amount Requested:
(check one)

- ☒ within arbitration limits
☐ outside arbitration limits

CI-19-10293

Is this a Class Action Suit? ☐ Yes ☒ No

Is this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: NEIL L. ALBERT, ESQUIRE

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

Nature of the Case:

Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other

☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

- ☐ Zoning Board
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☒ Other:
Recovery of Health & Safety
Response Costs

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional: