

ORIGINAL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

sealed

RICHARD M. SCAIFE,

FAMILY DIVISION

Plaintiff,

F.D. No. 06-002384-001

v.

MARGARET R. SCAIFE,

**REPLY AND NEW MATTER TO
DEFENDANT'S PETITION FOR
ENFORCEMENT OF ORDER OF
COURT DATED JUNE 13, 2007**

Defendant.

Filed on Behalf of: Plaintiff
Richard M. Scaife

Counsel of Record for This
Party:

H. Yale Gutnick, Esquire
Pa. I.D. No. 01226

Reid B. Roberts, Esquire
Pa. I.D. No. 41007

Ronald D. Barber, Esquire
Pa. I.D. No. 52734

STRASSBURGER McKENNA
GUTNICK & POTTER, P.C.
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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

RICHARD M. SCAIFE,) FAMILY DIVISION
)
Plaintiff,) F.D. No. 06-002384-001
)
vs.)
)
MARGARET R. SCAIFE,)
)
Defendant.)

**REPLY AND NEW MATTER TO
DEFENDANT'S PETITION FOR ENFORCEMENT
OF ORDER OF COURT DATED JUNE 13, 2007**

Plaintiff Richard M. Scaife, by his attorneys H. Yale Gutnick, Reid B. Roberts and Strassburger McKenna Gutnick & Potter P.C., responds as follows to Defendant's Petition For Enforcement of Order of Court Dated June 13, 2007 (hereinafter "Petition"):

Introduction

On June 13, 2007, Defendant Margaret R. Scaife ("Wife") presented various Motions to this Court, arguing, *inter alia*, that some of her personal effects had not been returned to her despite efforts between the parties and their counsel to do so. During argument on June 13, 2007, Husband's counsel represented to the Court – correctly – that virtually all of Wife's personal effects had been returned to her, with the single exception being her personal effects from Husband's residence in Nantucket, Massachusetts. As to those items, Husband's counsel represented to the Court – correctly – that those items were

in the process of being collected for delivery to Wife. (This was also stated in writing six times in Husband's written response to the earlier petition.)

No one indicated that this should not be done.

It has now been done, and the present Petition is nothing more than a vexatious attempt to punish Husband for doing it.

The return to Wife of the last items of her personal effects has not only now been accomplished, but it has been accomplished in a proper and dignified fashion. Boxes containing clothing, cosmetics, purses, shoes, personal photographs and similar effects were carefully and securely packed and mailed via United Parcel Service to Wife's home, where she employs a full-time staff. They were carefully packed and mailed by staff who used to work for Wife. And there is not a single allegation in the Petition that any of the clothing or personal effects involved in this mailing were broken, spilled, disturbed or damaged in even the slightest degree. This mailing did not include any "valuable paintings, artworks, *objects d'art*, antiques, furnishings, crystal, sterling and other flatware and serving pieces, dining services, collectibles of many types, [or] carpets" referred to Paragraph 4 of the Petition.

Nor is there any explanation of how the return of these personal effects – which was announced as early as June 13, 2007 – will make the process of inventorying marital personal property any more difficult. It quite simply will not. An inventory of Wife's clothing, purses and shoes is irrelevant to this case.

Out of this simple, good-faith act of returning items as counsel said in open court was "in the process" of being done, Wife seeks:

- To have her unilateral choice for Conservator appointed, despite a specific and timely objection to that choice interposed by Husband's counsel (see the exchange of correspondence attached hereto as Exhibits "A" and "B");
- To have *Husband* now retrospectively inventory every item in the recent mailing, *even though those items are right now in Wife's exclusive possession*;
- To have Husband store at his expense items that Wife would prefer to have in storage;
- To impose a freeze on *all* of Husband's assets, without limitation; and
- To impose attorneys fees, costs and fines on Husband.

In addition, by filing the present Petition, Wife seeks to cover up the fact that she has herself failed to disclose inventories in her own possession and in the possession of an interior decorator retained by her – something the interior decorator admitted on July 24, 2007, after the Petition had been prepared and served on Husband's counsel.

This is outrageous and overreaching; Wife's Petition should be denied.

Response to Specific Allegations

1. Admitted only that the parties married on June 1, 1991. The parties separated on or about February 12, 2005.
2. Paragraph 2 contains only conclusions of law to which no response is required and which are deemed to be denied.
3. Paragraph 3 contains conclusions of law to which no response is required, and is deemed to be denied. By way of further response, Husband

avers that his homes, and most of the items of personal property within each of those homes, were owned by him prior to the marriage.

4. Paragraph 4 contains only conclusions of law to which no response is required and which are deemed to be denied.

5. Paragraph 5 contains only conclusions of law to which no response is required and which are deemed to be denied.

6. The averments of Paragraph 6 are specifically denied. On the contrary, Husband and others acting on his behalf have at all times acted diligently and in good faith. Any errors or delays in the process of locating and/or transferring items have been solely the result of the amount of personal property and the distance separating Husband's several residences.

7. Denied for the reasons set forth in Paragraph 6 hereof and in the Introductory Paragraph, above.

8. Denied for the reasons set forth in Paragraph 6 hereof and in the Introductory Paragraph, above.

9. The averments of Paragraph 9 are specifically denied. On the contrary, Husband has directed his staff to package and deliver Wife's personal effects carefully, safely, without damage and with sufficient notice.

10. Denied. Correspondence between counsel are documents that speak for themselves. By way of further response, Husband incorporates herein the Introductory Paragraph and paragraphs 6 and 9 above by this reference.

11. Denied. Correspondence between counsel are documents that speak for themselves. By way of further response, Husband incorporates herein the Introductory Paragraph and paragraphs 6 and 9 above by this reference.

12. Denied. The June 13 Petition for Special Relief, and this Court's Order, are matters of record which speak for themselves.

13. Denied. This Court's Order is a matter of record which speaks for itself.

14. Denied. This Court's Order is a matter of record which speaks for itself.

15. Denied. This Court's Order is a matter of record which speaks for itself.

16. Denied. By way of further response, Husband incorporates herein the Introductory Paragraph and paragraphs 6 and 9 above by this reference.

17. Denied. In fact, this matter was referred to as early as June 13, 2007 in open court.

18. It is admitted only that on or about July 18, 2007, Husband's counsel again referred to Wife's Nantucket personal effects and gave more specific information than had theretofore been available about their mailing. The remaining averments of Paragraph 18 are specifically denied. Copies of the UPS shipping and related receipts are attached hereto as Exhibit "C."

19. Denied as stated. It will be entirely possible for Wife to inventory her personal effects, which are now in her exclusive possession, should she choose to do so. It is specifically denied that inventorying these personal effects is relevant to the present action, nor that Husband or his agents have made any inventory impossible or even more difficult.

20. The averments of Paragraph 20 are specifically denied. On the contrary, Wife has requested the return of these items as indicated in the

exchanges of correspondence between the parties' counsel. By way of further response, Husband incorporates herein the Introductory Paragraph and paragraphs 6 and 9 above by this reference.

21. The averments of Paragraph 21 are specifically denied. On the contrary, Husband acted in the context and for the reasons set forth in the Introductory Paragraph and paragraphs 6 and 9 hereof, all of which are incorporated herein by this reference. By way of further response, these items are irrelevant to the efforts to identify and locate marital personal property.

22. The averments of Paragraph 22 are specifically denied. On the contrary, Husband acted in the context and for the reasons set forth in the Introductory Paragraph and paragraphs 6 and 9 hereof, all of which are incorporated herein by this reference. By way of further response, these items are irrelevant to the upcoming inspection visits.

23. Denied for the reasons set forth in the preceding Paragraphs 21 and 22.

24. The averments of Paragraph 24 are specifically denied for the reasons set forth hereinabove. By way of further response, this Court's Order is a matter of record which speaks for itself.

25. The averments of Paragraph 25 are specifically denied for the reasons set forth hereinabove.

26. The averments of Paragraph 26 are specifically denied. On the contrary, Husband believed that all inventories and logs had been produced. It was only in the course of final preparation for the inspection of Husband's Pebble Beach residence that a small number of additional volumes were discovered at

Pebble Beach, sequestered in an area evidently known to Wife. These materials have been produced to Wife's counsel forthwith. Once again, Husband and others acting on his behalf have at all times acted diligently and in good faith. Any errors or delays in the process of locating and/or transferring items have been solely the result of the amount of personal property and the distance separating Husband's several residences.

27. Denied. Wife's June 13, 2007 Petition is a matter of record that speaks for itself.

28. Denied. Wife's June 13, 2007 Petition is a matter of record that speaks for itself.

29. Denied. Wife's June 13, 2007 Petition and this Court's Order are matters of record that speak for themselves.

30. Denied. Wife's June 13, 2007 Petition and this Court's Order are matters of record that speak for themselves.

31. The averments of Paragraph 31 are specifically denied for the reasons set forth in Paragraph 26, above.

32. The averments of Paragraph 32 are specifically denied for the reasons set forth in Paragraph 26, above.

33. Denied. Wife's June 13, 2007 Petition and this Court's Order are matters of record that speak for themselves. By way of further response, the return to Wife as requested of her clothing, shoes, purses and similar personal effects is irrelevant to the inventories, logs and inspections.

34. Denied. Wife's June 13, 2007 Petition and this Court's Order are matters of record that speak for themselves. By way of further response, the

return to Wife as requested of her clothing, shoes, purses and similar personal effects is irrelevant to the inventories, logs and inspections.

35. Denied. Wife's June 13, 2007 Petition and this Court's Order are matters of record that speak for themselves. By way of further response, the return to Wife as requested of her clothing, shoes, purses and similar personal effects is irrelevant to the inventories, logs and inspections.

36. Admitted.

37. Paragraph 37 contains only conclusions of law to which no responsive pleading is required and which are deemed to be denied. By way of further response, Husband avers that Wife is not entitled to any of the relief requested.

38. Paragraph 38 contains only conclusions of law to which no responsive pleading is required and which are deemed to be denied. By way of further response, Husband avers that Wife is not entitled to any of the relief requested.

39. Paragraph 39 contains only conclusions of law to which no responsive pleading is required and which are deemed to be denied. By way of further response, Husband avers that Wife is not entitled to any of the relief requested.

40. The averments of Paragraph 40 are specifically denied for the reasons set forth hereinabove.

41. The averments of Paragraph 41 are specifically denied for the reasons set forth hereinabove.

42. After reasonable investigation, Husband is without knowledge or information sufficient to form a belief as to the truth of the matters alleged in Paragraph 42, and those allegations are therefore denied.

43. Paragraph 43 contains only conclusions of law to which no responsive pleading is required and which are deemed to be denied. By way of further response, Husband avers that Wife is not entitled to any of the relief requested.

WHEREFORE, Plaintiff Richard M. Scaife respectfully requests that the Petition For Enforcement of Order of Court Dated June 13, 2007 be denied.

NEW MATTER

44. Paragraphs 1 through 43 above, together with the Introductory Paragraph hereof, are incorporated herein by this reference.

45. Wife's action in bringing this Petition was intended to divert attention from the fact that Wife and/or her counsel failed until this week to produce to Husband the inventories created for Wife by Stiles Colwill of the contents of Husband's home at 613 Pitcairn Place, Pittsburgh, Pennsylvania in 2004, 2005, 2006 and/or 2007. Mr. Colwill admitted, in the presence of counsel for Husband and Wife on July 24, 2007, that he had prepared certain inventories, that he had them in his possession and that he had given copies of them to Wife as well. Those inventories were not produced by Wife to Husband in a timely fashion.

46. Wife's action in bringing this Petition was manifestly without basis in fact or law, and constitutes obdurate, dilatory and vexatious conduct, with the

intent and purpose of harassing Husband and causing the unnecessary expenditure of counsel fees to both parties.

47. Therefore, Husband respectfully requests a hearing for the purpose of establishing that Wife and/or her counsel are in contempt of court, and/or in violation of 42 Pa. C.S. §2503, and for the further purpose of establishing the appropriate monetary sanction for said violations.

WHEREFORE, Husband respectfully requests a hearing on his claims for contempt of court and violation of 42 Pa. C.S. §2503.

STRASSBURGER McKENNA GUTNICK
& POTTER, P.C.

By: 

H. Yale Gutnick, Esquire
Reid B. Roberts, Esquire
Ronald D. Barber, Esquire

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Counsel for Plaintiff
Richard M. Scaife

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ATTORNEYS AT LAW

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July 16, 2007

Reid B. Roberts, Esquire
H. Yale Gutnick, Esquire
Strassburger McKenna Gutnick & Potter, PC
Four Gateway Center
444 Liberty Avenue, Suite 2200
Pittsburgh, PA 15222

RE: Scaife v. Scaife

Gentlemen:

As per the Order of June 13, 2007, we are to select a Conservator, and failure to do will result in the Court appointing someone. We recommend James DePasquale, Esquire, to serve in this capacity.

Please advise as to your position regarding a recommendation.

Yours truly,


Gary G. Gentile

GGG:br





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July 20, 2007

Gary Gentile, Esquire
Goldberg Gruener Gentile Horoho & Avalli
Suite 230 Grant Building
310 Grant Street
Pittsburgh, PA 15219

RE: Scaife v. Scaife

Dear Gary:

This is in response to your letter dated July 16, 2007 in which you proposed James DePasquale, Esquire, as a Conservator in the above case. Due to potential conflict issues with this firm, we are uncomfortable with your selection. In addition, we do not believe Mr. DePasquale has any judicial experience for this role. Consequently, we would recommend former Judge S. Louis Farino to be the Conservator, assuming he is willing to do this. Please let us know your position regarding this recommendation.

Very truly yours,

Reid B. Roberts

RBR/kpm

cc: H. Yale Gutnick, Esq.
William Pietragallo, II, Esquire



Welcome
to
ISLAND PARCEL PLUS

Store:1 Clerk:01 Register:1
07/17/2007 11:33:43
Transaction#: 11635

* RECEIPT REPRINT *

Reprinted On 07-18-2007 13:33:01
Number Name

SUNSHINE COTTAGE

1. UPS Ground Rs Ref#: 82568
1. Trk#: 1Z1X28660357485067
1. C-Declared Value: \$2000.00
1. Manual Weight: 31.0 lb
1. Zip: 15232 Zn: 4 Rt Wgt DW: 32 lb
1 @ 59.42 59.42
2 CUSTOM PKG SERVICES
1 @ 45.00 45.00

SubTotal: 104.42
Balance Due: 104.42
CCARD: 104.42
Change: 0.00

Thank You for
Shopping With
ISLAND PARCEL PLUS

Welcome
to
ISLAND PARCEL PLUS

Store:1 Clerk:01 Register:2
07/17/2007 11:54:44
Transaction#: 11627

* RECEIPT REPRINT *

Reprinted On 07-18-2007 13:33:09
Number Name

SUNSHINE COTTAGE

1. UPS Ground Rs Ref#: 82571
1. Trk#: 1Z1X28660356202891
1. C-Declared Value: \$2000.00
1. Manual Weight: 16.0 lb
1. Zip: 15232 Zn: 4 Rt Wgt : 16 lb
1 @ 38.91 38.91
2 CUSTOM PKG SERVICES
1 @ 45.00 45.00

SubTotal: 83.91
Balance Due: 83.91
CCARD: 83.91
Change: 0.00

Thank You for
Shopping With
ISLAND PARCEL PLUS

Welcome
to
ISLAND PARCEL PLUS

Store:1 Clerk:01 Register:3
07/16/2007 1:33:18
Transaction#: 116548

* RECEIPT REPRINT *

Reprinted On 07-18-2007 13:33:24
Number Name

SUNSHINE COTTAGE

1. UPS Ground Rs Ref#: 82461
1. Trk#: 1Z1X28660357548945
1. No Value Declared
1. Manual Weight: 30.0 lb
1. Zip: 15232 Zn: 4 Rt Wgt : 30 lb
1 @ 26.33 26.33

2. UPS Ground Rs Ref#: 82462
2. Trk#: 1Z1X28660355535953
2. No Value Declared
2. Manual Weight: 28.0 lb
2. Zip: 15232 Zn: 4 Rt Wgt : 28 lb
1 @ 23.14 23.14

3. UPS Ground Rs Ref#: 82463
3. Trk#: 1Z1X28660355582161
3. No Value Declared
3. Manual Weight: 52.0 lb
3. Zip: 15232 Zn: 4 Rt Wgt : 52 lb
1 @ 35.38 35.38

4. UPS Ground Rs Ref#: 82464
4. Trk#: 1Z1X28660357351577
4. No Value Declared
4. Manual Weight: 54.0 lb
4. Zip: 15232 Zn: 4 Rt Wgt : 64 lb
1 @ 39.48 39.48

5. UPS Ground Rs Ref#: 82465
5. Trk#: 1Z1X28660355715991
5. No Value Declared
5. Manual Weight: 35.0 lb
5. Zip: 15232 Zn: 4 Rt Wgt : 35 lb
1 @ 27.08 27.08

6. UPS Ground Rs Ref#: 82467
6. Trk#: 1Z1X28660356439001
6. No Value Declared
6. Manual Weight: 45.0 lb
6. Zip: 15232 Zn: 4 Rt Wgt : 45 lb
1 @ 32.37 32.37

7. UPS Ground Rs Ref#: 82468
7. Trk#: 1Z1X2866035641213



16No Value Declared
 16Manual Weight: 48.0 lb
 16Zip:15232 Zn:4 Rt Wgt :48 lb
 1 e 33.72
 17UPS Ground Rs Ref#:82479
 17Trk#:121X28660356796723
 17No Value Declared
 17Manual Weight: 33.0 lb
 17Zip:15232 Zn:4 Rt Wgt DW:37 lb
 1 e 28.12
 18UPS Ground Rs Ref#:82481
 18Trk#:121X28660355497147
 18No Value Declared
 18Manual Weight: 33.0 lb
 18Zip:15232 Zn:4 Rt Wgt DW:42 lb
 1 e 30.81
 19UPS Ground Rs Ref#:82482
 19Trk#:121X28660356028151
 19No Value Declared
 19Manual Weight: 33.0 lb
 19Zip:15232 Zn:4 Rt Wgt DW:37 lb
 1 e 28.12
 20UPS Ground Rs Ref#:82483
 20Trk#:121X28660356098362
 20No Value Declared
 20Manual Weight: 27.0 lb
 20Zip:15232 Zn:4 Rt Wgt DW:42 lb
 1 e 30.81
 21UPS Ground Rs Ref#:82484
 21Trk#:121X28660355971777
 21No Value Declared
 21Manual Weight: 14.0 lb
 21Zip:15232 Zn:4 Rt Wgt DW:42 lb
 1 e 30.81
 22UPS Ground Rs Ref#:82485
 22Trk#:121X2866035792381
 22No Value Declared
 22Manual Weight: 35.0 lb
 22Zip:15232 Zn:4 Rt Wgt :35 lb
 1 e 27.08
 23UPS Ground Rs Ref#:82487
 23Trk#:121X28660355851209
 23No Value Declared
 23Manual Weight: 52.0 lb
 23Zip:15232 Zn:4 Rt Wgt :52 lb
 1 e 35.38
 25UPS Ground Rs Ref#:82512
 25Trk#:121X28660355894568
 25No Value Declared
 25Manual Weight: 46.0 lb
 25Zip:15232 Zn:4 Rt Wgt :46 lb
 1 e 32.79
 26UPS Ground Rs Ref#:82516
 26Trk#:121X28660356943402
 16No Value Declared
 16Manual Weight: 44.0 lb
 16Zip:15232 Zn:4 Rt Wgt :44 lb
 1 e 31.85
 17UPS Ground Rs Ref#:82469
 17Trk#:121X28660357486628
 17No Value Declared
 17Manual Weight: 51.0 lb
 17Zip:15232 Zn:4 Rt Wgt :51 lb
 1 e 36.96
 18UPS Ground Rs Ref#:82470
 18Trk#:121X28660355819236
 18No Value Declared
 18Manual Weight: 41.0 lb
 18Zip:15232 Zn:4 Rt Wgt :41 lb
 1 e 30.30
 19UPS Ground Rs Ref#:82471
 19Trk#:121X28660356763064
 19No Value Declared
 19Manual Weight: 34.0 lb
 19Zip:15232 Zn:4 Rt Wgt :34 lb
 1 e 26.51
 20UPS Ground Rs Ref#:82472
 20Trk#:121X28660357822059
 20No Value Declared
 20Manual Weight: 20.0 lb
 20Zip:15232 Zn:4 Rt Wgt :20 lb
 1 e 18.83
 21UPS Ground Rs Ref#:82473
 21Trk#:121X28660355180265
 21No Value Declared
 21Manual Weight: 49.0 lb
 21Zip:15232 Zn:4 Rt Wgt :49 lb
 1 e 34.13
 22UPS Ground Rs Ref#:82474
 22Trk#:121X28660356301677
 22No Value Declared
 22Manual Weight: 55.0 lb
 22Zip:15232 Zn:4 Rt Wgt :55 lb
 1 e 36.47
 24UPS Ground Rs Ref#:82475
 24Trk#:121X28660356530287
 24No Value Declared
 24Manual Weight: 41.0 lb
 24Zip:15232 Zn:4 Rt Wgt :41 lb
 1 e 30.30
 25UPS Ground Rs Ref#:82476
 25Trk#:121X28660357690095
 25No Value Declared
 25Manual Weight: 36.0 lb
 25Zip:15232 Zn:4 Rt Wgt DW:37 lb
 1 e 28.12
 26UPS Ground Rs Ref#:82477
 26Trk#:121X28660356685101
 17No Value Declared
 17Manual Weight: 44.0 lb
 17Zip:15232 Zn:4 Rt Wgt :44 lb
 1 e 31.85
 18UPS Ground Rs Ref#:82469
 18Trk#:121X28660357486628
 18No Value Declared
 18Manual Weight: 51.0 lb
 18Zip:15232 Zn:4 Rt Wgt :51 lb
 1 e 36.96
 19UPS Ground Rs Ref#:82470
 19Trk#:121X28660355819236
 19No Value Declared
 19Manual Weight: 41.0 lb
 19Zip:15232 Zn:4 Rt Wgt :41 lb
 1 e 30.30
 20UPS Ground Rs Ref#:82471
 20Trk#:121X28660356763064
 20No Value Declared
 20Manual Weight: 34.0 lb
 20Zip:15232 Zn:4 Rt Wgt :34 lb
 1 e 26.51
 21UPS Ground Rs Ref#:82472
 21Trk#:121X28660357822059
 21No Value Declared
 21Manual Weight: 20.0 lb
 21Zip:15232 Zn:4 Rt Wgt :20 lb
 1 e 18.83
 22UPS Ground Rs Ref#:82473
 22Trk#:121X28660355180265
 22No Value Declared
 22Manual Weight: 49.0 lb
 22Zip:15232 Zn:4 Rt Wgt :49 lb
 1 e 34.13
 23UPS Ground Rs Ref#:82474
 23Trk#:121X28660356301677
 23No Value Declared
 23Manual Weight: 55.0 lb
 23Zip:15232 Zn:4 Rt Wgt :55 lb
 1 e 36.47
 24UPS Ground Rs Ref#:82475
 24Trk#:121X28660356530287
 24No Value Declared
 24Manual Weight: 41.0 lb
 24Zip:15232 Zn:4 Rt Wgt :41 lb
 1 e 30.30
 25UPS Ground Rs Ref#:82476
 25Trk#:121X28660357690095
 25No Value Declared
 25Manual Weight: 36.0 lb
 25Zip:15232 Zn:4 Rt Wgt DW:37 lb
 1 e 28.12
 26UPS Ground Rs Ref#:82477
 26Trk#:121X28660356685101
 26No Value Declared
 26Manual Weight: 28.0 lb
 26Zip:15232 Zn:4 Rt Wgt :28 lb
 1 e 23.14
 28UPS Ground Rs Ref#:82519
 28Trk#:121X28660356367637
 28No Value Declared
 28Manual Weight: 47.0 lb
 28Zip:15232 Zn:4 Rt Wgt :47 lb
 1 e 33.25
 29UPS Ground Rs Ref#:82520
 29Trk#:121X28660357819467
 29No Value Declared
 29Manual Weight: 38.0 lb
 29Zip:15232 Zn:4 Rt Wgt :38 lb
 1 e 28.69
 30UPS Ground Rs Ref#:82521
 30Trk#:121X28660356166158
 30C-Declared Value: \$4000.00
 30Manual Weight: 28.0 lb
 30Zip:15232 Zn:4 Rt Wgt DW:42 lb
 1 e 74.81
 31UPS Ground Rs Ref#:82522
 31Trk#:121X28660357772667
 31C-Declared Value: \$4000.00
 31Manual Weight: 52.0 lb
 31Zip:15232 Zn:4 Rt Wgt :52 lb
 1 e 79.38
 32UPS Ground Rs Ref#:82523
 32Trk#:121X28660356307078
 32C-Declared Value: \$4000.00
 32Manual Weight: 40.0 lb
 32Zip:15232 Zn:4 Rt Wgt :40 lb
 1 e 73.78
 33UPS Ground Rs Ref#:82524
 33Trk#:121X28660357298680
 33C-Declared Value: \$4000.00
 33Manual Weight: 31.0 lb
 33Zip:15232 Zn:4 Rt Wgt :31 lb
 1 e 68.85
 34UPS Ground Rs Ref#:82525
 34Trk#:121X28660357786492
 34No Value Declared
 34Manual Weight: 53.0 lb
 34Zip:15232 Zn:4 Rt Wgt :53 lb
 1 e 35.74
 35UPS Ground Rs Ref#:82528
 35Trk#:121X28660357331713
 35C-Declared Value: \$2000.00
 35Manual Weight: 20.0 lb
 35Zip:15232 Zn:4 Rt Wgt :20 lb
 1 e 170.05
 36CUSTOM PKO SERVICE8
 1 e 65.00

Welcomes
 to
ISLAND PARCEL PLUS

Store: 3 Clerk: 01 Register: J
 07/16/2007 1:46:59
 Transaction#: 114605

 * RECEIPT REPRINT *

 Reprinted On 07-18-2007 13:33:16
 Number Name

 SUNSHINE COFFAGE

- 1. UPS Ground R# Ref#: 82549
- 1. Trk#: 1Z1X28660356902885
- 1. No Value Declared
- 1. Manual Weight: 5.0 lb
- 1. Zip: 15232 Zn: 4 Rt Wgt: 6 lb
- 1 @ 14.42 14.42
- 2. UPS Ground R# Ref#: 82550
- 2. Trk#: 1Z1X28660356454691
- 2. No Value Declared
- 2. Manual Weight: 31.0 lb
- 2. Zip: 15232 Zn: 4 Rt Wgt: 31 lb
- 1 @ 24.85 24.85
- 3. UPS Ground R# Ref#: 82551
- 3. Trk#: 1Z1X28660356481705
- 3. No Value Declared
- 3. Manual Weight: 21.0 lb
- 3. Zip: 15232 Zn: 4 Rt Wgt: 42 lb
- 1 @ 30.81 30.81

 SubTotal: 70.08

 Balance Due: 70.08
 CCard: 70.08

 Change: 0.00

 SubTotal: 1383.58

 Balance Due: 1383.58
 CCard: 1383.58

 Change: 0.00

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

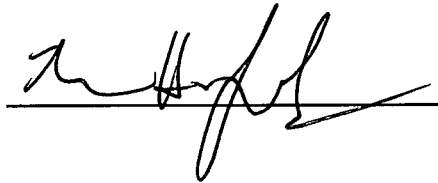
RICHARD M. SCAIFE,) FAMILY DIVISION
Plaintiff,) F.D. No. 06-002384-001
vs.)
MARGARET R. SCAIFE,)
Defendant.)

ORDER

AND NOW, this 3 day of ~~July~~^{August}, 2007, upon consideration of the Plaintiff's Reply and New Matter to Defendant's Petition for Enforcement of Order of Court Dated June 13, 2007, it is hereby ORDERED as follows:

- ~~1. Defendant's Petition for Enforcement is DENIED, and~~
2. This Court shall conduct a ~~hearing~~^{consultation} on August, 2007 at 3:30 .m. on Plaintiff's claims for contempt of court and violation of 42 Pa. C.S. §2503.

By the Court:

 , J.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Reply and New Matter to Defendant's Petition for Enforcement of Order of Court Dated June 13, 2007** was served by Hand Delivery, this 2nd day of August, 2007, on the following:


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By: 
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